

VOSH PROGRAM DIRECTIVE: 13-065

ISSUED: April 30, 2020

SUBJECT **Virginia BUILT - Building Safety and Health Excellence in Construction Through Mentorship and Training**

Purpose This Directive memorializes a strategic partnership program between the VOSH Program and the Associated Builders and Contractors Virginia Chapter (ABC-VA)

This Program Directive is an internal guideline, not a statutory or regulatory rule, and is intended to provide instructions to VOSH personnel regarding internal operation of the Virginia Occupational Safety and Health Program and is solely for the benefit of the program. This document is not subject to the Virginia Register Act or the Administrative Process Act; it does not have general application and is not being enforced as having the force of law.

Certification This Program Directive is considered to meet the definition of “guidance document” contained in a §2.2-4101 of the Code of Virginia: “any document developed by a state agency or staff that provides information or guidance of general applicability to the staff or public to interpret or implement statutes or the agency's rules or regulations, excluding agency minutes or documents that pertain only to the internal management of agencies.”.

Notwithstanding the issuance date of this Program Directive, and in accordance with §2.2-4002.1.B of the Code of Virginia, this Program Directive has been or will be subject to a 30-day public comment period, to include public comment through the Virginia Regulatory Town Hall website, after publication in the Virginia Register of Regulations and prior to its effective date.

Notwithstanding the issuance date of this Program Directive, and in accordance with §2.2-4002.1.C of the Code of Virginia, if a written comment is received during a public comment period asserting that the guidance document is contrary to state law or regulation, or that the document should not be exempted from the provisions of this chapter, the effective date of the guidance document by the agency shall be delayed for an additional 30-day period.

Scope This Directive applies VOSH-wide.

Reference VOSH Directive 09-065 Virginia BUILT Policies and Procedures Manual (April 30, 2020)

<u>Cancellation</u>	Not Applicable
<u>Effective Date</u>	April 30, 2020
<u>Expiration Date</u>	Not Applicable.
<u>Action</u>	Directors and Managers shall ensure that policies and procedures established in this Directive are uniformly enforced and field personnel understand and comply with the requirements included in this Directive.

C. Ray Davenport
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Commissioner

Distribution:	Commissioner of Labor and Industry Assistant Commissioner VOSH Directors and Managers VOSH Legal Support & OIS Staffs	Director of Cooperative Programs VOSH Compliance & Cooperative Programs Staffs OSHA Region III & OSHA Norfolk Area Offices
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When the guidelines, as set forth in this Program Directive, are applied to the Commissioner of the Department of Labor and Industry and/or to Virginia employers, the following federal terms if, and where they are used, shall be considered to read as below:

<u>Federal Terms</u>	<u>VOSH Equivalent</u>
OSHA	VOSH
Federal Agency	State Agency
Agency	Department
Regional Administrator	Assistant Commissioner
Area Director	Regional Director
Regional Solicitor	Attorney General or VOSH Division of Legal Support (DLS)
Office of Statistics	VOSH Office of Research and Analysis
29 CFR	VOSH Standard
Compliance Safety and Health Officer (CSHO)	CSHO



Definitions:

ABC-VA: Associated Builders and Contractors Virginia Chapter.

Competent person: A person who, through training and experience, must be able to recognize hazards and has the authority to take prompt corrective action.

Construction Schedule: A programmed construction inspection selected from a list of sites provided by the University of Tennessee. The Construction Schedule does not include VOSH Local and National Inspection Programs (e.g., trenching, fall protections, scaffolds, etc.).

Designated Safety Representative (DSR): An employee of an applicant that is responsible for safety and health management within the organization. If designated by a Tier One, Tier Two, or Tier Three applicant, the DSR must also meet Mentor requirements as defined in this document.

Hazard recognition: Identification of hazards in the workplace that, if unabated, could potentially cause bodily harm.

Incident: An undesirable event that results from a failure to meet acceptable standards and causes harm to people, property, or processes (e.g., in-patient hospitalization, amputation, loss of an eye).

Key Subcontractor: A participant's subcontractor identified by ABC-VA and VOSH based on the following criteria:

1. **Risk** (the perceived risk level associated with the construction work activities/hazards scheduled to occur at the worksite – e.g., steel erection, roofing/siding, masonry work, scaffolding, fall protection hazards, electrical hazards)
2. **Duration** (30% to 70% scheduled completion)
3. **Size** (number of employees).

Major worksite: A construction site that is eligible for consideration for either the required VOSH Consultation onsite surveys required for Tier One, Tier Two, and Tier Three applications; or the required ABC-VA and VOSH onsite review for Tier Three applications. Major worksite eligibility will be determined

by the ABC-VA and VOSH based on the following criteria:

1. Risk (the perceived risk level associated with the construction work activities/hazards scheduled to occur at the worksite – e.g., steel erection, roofing/siding, masonry work, scaffolding, fall protection hazards, electrical hazards)
2. Duration (30% to 70% scheduled completion)
3. Value (total project value; or the percent of gross revenue that the total project value represents to the applicant).

Mentor: A Qualified Mentor shall be employed full time by a Tier One, Tier Two, or Tier Three Participant. The Mentor shall have five (5) years of safety and health construction experience with safety and health comprising a minimum of 50% of their responsibilities. Mentors must submit evidence of qualifications in one of these three categories and be approved by the VBCEC:

- A Bachelors or greater degree in an Occupational Health and Safety related field;
- A current professional safety certification from a nationally recognized and accredited organization; or
- A combination of construction safety and health training and professional experience.

Onsite review: A jobsite review to assess whether the employer’s safety and health management system meets the requirements for the tier of achievement the applicant is seeking. A team of ABC-VA and VOSH representatives conducts a walkthrough/assessment of a project that will include an observation of how the employer responds to abating identified hazards, written programs, training records, and all other items related to the applicable achievement tier.

Other violation: [Other than serious] means a violation which is not, by itself, a serious violation within the meaning of the law but which has a direct or immediate relationship to occupational safety or health.

<http://leg1.state.va.us/cgi-bin/legp504.exe?000+reg+16VAC25-60-10>

NAICS: North American Industrial Classification System.

Near-hit Incident: A hazard in the workplace that could potentially cause bodily harm where there is employee exposure (top rail of guardrail system is missing and employees are working in the area).

Program Achievement Tiers of Participation:

Mentorship Tier: The introductory tier of participation in the partnership for those employers actively working with the ABC-VA Virginia BUILT Council (VBC) to improve their safety and health management systems, with the goal of becoming a Tier One participant. Mentorship Tier participants are actively working on developing and implementing an effective safety and health

management system that meets current VOSH regulatory requirements.

Tier One: The introductory tier of recognition in the partnership. Tier One participants have developed and implemented an effective safety and health management system that meets current VOSH regulatory requirements.

Tier Two: The intermediate tier of recognition in the partnership for those employers that demonstrate outstanding safety and health performance and are actively working with the VBC to continuously improve, with the goal of becoming a Tier Three participant. Tier Two participants have built an established safety and health management system that exceeds current VOSH regulatory requirements.

Tier Three: The highest achievement tier in the Virginia BUILT program for participants having an exceptional safety and health management system that serves as a model for other construction employers. Tier Three participants pass on their hard-earned knowledge, experience, and training in construction safety and health management systems by actively mentoring other contractors and subcontractors who want to develop and achieve world class safety and health protections for their employees.

STEP: Safety Training Evaluation Process¹. Founded in 1989 as a safety benchmarking and improvement tool, STEP has evolved into a world-class safety management system that dramatically improves safety performance among participants regardless of company size or type of work. Participating ABC member firms measure their safety processes and policies on 24 key components through a detailed questionnaire with the goal of implementing or enhancing safety programs that reduce jobsite incidents.

Unprogrammed inspection: An inspection performed in response to a report of imminent danger, a fatality, in-patient hospitalization, amputation, loss of an eye, referral, or employee complaint.

VBC: ABC-VA's Virginia BUILT Council. The VBC will be comprised of all Tier One, Tier Two and Tier Three participants. Participation is mandatory, and all qualified participants must be willing to act as mentors.

VBCEC: The VBC Executive Committee will consist of up to 8 Tier Two or Tier Three participants whose main responsibility is to manage the partnership, and review and validate all applicants for Mentorship Tier, Tier One, Tier Two, or Tier Three participation. Each member will serve a three-year term.

VOSH: Virginia Occupational Safety and Health Program of the Virginia Department of Labor and Industry.

VOSH Strategic Partner: ABC-VA is a contractor association that participates in a voluntary and cooperative

¹ STEP is a trademark of the Associated Builders and Contractors.

relationship with VOSH in an effort to reduce construction related workplace injuries and illnesses in Virginia.

Virginia BUILT:

*Building Safety and Health Excellence In Construction
Through Mentorship and Training*



A Strategic Partnership Program of the Associated Builders and Contractors
Virginia Chapter (ABC-VA) and the Virginia Occupational Safety and Health (VOSH)
Program of the Virginia Department of Labor and Industry

A. Background

The Virginia BUILT program is a strategic partnership of the VOSH Program and the ABC-VA. It was established as a result of a series of meetings starting in 2017, where the ABC-VA and the VOSH Program met to discuss a partnership that would recognize the importance of providing a safe and healthful work environment in the construction industry. To advance this mutual goal, the parties agreed to pursue a cooperative relationship that encourages select construction participants to mentor other contractors to develop exceptional safety and health management systems and recognize that achievement through the Virginia BUILT program.

An essential component of Virginia BUILT is the incorporation of the ABC STEP program (Safety Training Evaluation Process) as the gateway to participation in Virginia BUILT. Founded in 1989 as a safety benchmarking and improvement tool, STEP has evolved into a world-class safety management system that dramatically improves safety performance among participants regardless of company size or type of work. Participating ABC member firms measure their safety processes and policies on 24 key components resulting in recognition through progressive levels of achievement (Bronze, Silver, Gold, Platinum, and Diamond).

B. Virginia BUILT Strategic Partnership Program

1. Purpose

The purpose of Virginia BUILT is to work to decrease recognized hazards, serious injuries, illnesses, and fatalities for participating contractors; and to improve existing safety and health management systems in the Commonwealth of Virginia. Virginia BUILT seeks to work with construction employers who have demonstrated a commitment to improving their occupational safety and health practices and who are willing to share resources and best practices, mentor others, and work with the construction industry at large to establish industry-wide exemplary safety and health management systems. Participants in Virginia BUILT will receive incentives for their participation depending upon their tier of recognition.

2. Scope

The Virginia BUILT program applies to ABC-VA member construction employers working in the Commonwealth of Virginia who meet the program requirements. The program specifically applies to construction sites and does not apply to contractor yards, shops, or administrative offices. Virginia BUILT will be administered in accordance with Virginia occupational safety and health laws, regulations, policies, procedures, and applicable federal law.

3. Program Expectations

This strategic partnership has been negotiated between ABC-VA and the VOSH Program. Owners, association members, and worker representatives are encouraged to endorse and participate in Virginia BUILT.

- a. Implementation of this program is expected to result in decreased serious injuries, illnesses, and fatalities for participating contractors; and the improvement of existing safety and health management systems throughout the Commonwealth of Virginia.
- b. Virginia BUILT provides for incentives to construction employers that voluntarily participate in the program and demonstrate their achievement of effective and successful safety and health management systems.
- c. This program will not in any way affect the employer's or the employees' ability to exercise their rights under VOSH laws, standards, and regulations, or the Occupational Safety and Health Act of 1970 (OSH Act).
- d. The number of employers who may be approved as participants will depend on the availability of ABC-VA and VOSH resources.

4. Specific Goals of the Partnership

- a. The Virginia BUILT Strategic Partnership seeks to measurably reduce the number of recognized hazards; and injuries, illnesses, and fatalities affecting contractor participant employers with a focus on eliminating injuries and fatalities resulting from those hazards that are the four leading causes of death on construction sites (falls, struck-by, caught in/or between, and electrocutions).
- b. To increase the number of construction employers that implement effective safety and health management systems and provide proactive safety and health training for management, supervisors, and employees.
- c. To recognize those construction employers that pass on their hard-earned knowledge, experience, and training in construction safety and health management systems through actively mentoring other contractors and subcontractors who want to develop and achieve world class safety and health protections for their employees.
- d. To recognize those construction employers whose managers and employees work together to develop safety and health management systems that meet and exceed basic compliance with all applicable VOSH laws, standards and regulations; and result in immediate and long-term prevention of job-related injuries, illnesses, and fatalities.
- e. To promote open lines of communication between VOSH and the construction industry in pursuit of improving safety and health protections for Virginia’s construction employees and employers:
 - (1) To increase the overall safety and health awareness of all contractors and employees on the participant’s work sites.
 - (2) To reduce the number of safety and health hazards on the participant’s work sites.
 - (3) To establish a list of “leading indicators” that can be monitored and evaluated in order to achieve items (1) and (2) above.
 - (4) To create ways to share expertise and other resources among participating companies and the construction industry as a whole (e.g., attend the Virginia Annual Safety and Health Conference, host Construction Safety Days, etc.).
 - (5) To recognize best practices that exceed VOSH/OSHA laws, standards, and regulations at covered work sites.

5. Responsibilities of Participants

- a. Maintain safe and healthy work places for all employees and contractors.
- b. Assign a competent person to every worksite that will have the experience and education to

identify safety and health hazards and the authority to supervise immediate correction of those hazards.

- c. Maintain all necessary safety and health management systems as required by the characteristics of the work site and the hazards present.
- d. Make steady improvement on all aspects of the overall program.
- e. Establish a system for self-inspection and evaluation.
- f. Establish a process for the correction of hazards identified by any means (self-inspections, program audits, onsite reviews, hazard assessments, incident investigations, etc.). The process will include the assigning of responsibility, time frames for correction, interim protection, and follow-up to ensure abatement of hazards.
- g. Ensure that subcontractors on site adhere to all safety and health rules and regulations at all times.
- h. Ensure that subcontractors are properly licensed.
- i. Ensure that key subcontractors provide safety and health protection equal to that received by participant employees and follow Virginia BUILT principles.
- j. Ensure employee involvement and participation in the program.
- k. Share resources, such as mentoring, training, and best practices with all subcontractors on site.

6. Benefits for Participants

- a. A DOLI website page will be dedicated to this partnership with recognition for Tier One, Tier Two, and Tier Three participants.
- b. Acceptance in the program can be publicized by the participants to enhance its marketplace recognition.
- c. Participants will be recognized as industry leaders in construction safety and health.
- d. Access to specific targeted training sessions conducted by VOSH Consultative Services.
- e. Priority access to VOSH Consultative Services for briefings on new standards, regulations, and emphasis programs.
- f. Potentially reduced costs in insurance rates, lost time, and less damaged or lost materials resulting in greater profit margin.
- g. Improved employee morale and productivity, and the ability to attract the best workers based on the participant's enhanced reputation in the industry.
- h. Use of the official logo, icons, devices and/or official program flag, etc.

7. Incentives

Upon acceptance as a Virginia BUILT participant, VOSH and ABC-VA will provide certain incentives to participants.

a. Mentorship Tier participants will:

- (1) Be assigned a mentor from the VBC to help them advance from Mentorship Tier to Tier One participant.
- (2) Receive a recognition letter from the ABC-VA.
- (3) Receive priority access to VOSH Consultative Services and ABC-VA safety performance enhancement assets.
- (4) Participate in the ABC-VA Safety Committee.
- (5) Be recognized on the ABC-VA Virginia BUILT website page as a Mentorship Tier participant.

b. Tier One participants will:

- (1) Receive a recognition letter from the ABC-VA and the Virginia BUILT Coordinator.
- (2) Receive priority access to VOSH Consultative Services and ABC-VA safety performance enhancement assets.
- (3) In the event of a VOSH inspection, will not receive citations for other than serious violations provided the hazards are abated during the inspection. If the other than serious violation is not abated during the inspection, the participant will be cited but not receive a penalty, provided the hazard is abated during VOSH's prescribed abatement period.
- (4) In the event of a VOSH inspection, will be eligible for the minimum good faith penalty reductions (currently 15 percent) available under the existing VOSH penalty assessment policy.
- (5) Participate in the ABC-VA Safety Committee.
- (6) Be recognized on the DOLI website page as a Tier One Virginia BUILT participant.

c. Tier Two participants will:

- (1) Receive a certificate of recognition from the Commissioner.
- (2) Receive priority access to VOSH Consultative Services and Virginia ABC safety performance enhancement assets.
- (3) In the event of a VOSH inspection, will not receive citations for other than serious violations, provided the hazards are abated during the inspection. If the other than serious violation is not abated during the inspection, the participant will be cited but not receive a penalty, provided the hazard is abated during VOSH's prescribed abatement period.

- (4) In the event of a VOSH inspection, will be eligible for the maximum good faith penalty reductions (currently 25 percent) available under the existing VOSH penalty assessment policy.
- (5) Be recognized on the DOLI website page as a Tier Two Virginia BUILT participant.

d. Tier Three participants will:

- (1) Receive a Governor's Proclamation and Flag raising ceremony.
- (2) Receive priority access to VOSH Consultative Services and Virginia ABC Safety performance enhancement assets.
- (3) General contractor participants receive an exemption from Construction Schedule inspections for all company sites in Virginia. Subcontractor participants will be excluded from the opening conference involving all other non-participant contractors and exempt from inspection for those sites where the General Contractor is not a Tier Three participant. Other inspections, such as complaint/referral investigations, incident investigations, local emphasis program inspections, etc., will still be conducted in accordance with the procedures in the VOSH Field Operations Manual (FOM).
- (4) In the event of a VOSH Unprogrammed inspection, will not receive citations for other than serious violations provided the hazards are abated during the inspection. If the other than serious violation is not abated during the inspection, the participant will be cited but not receive a penalty provided the hazard is abated during the VOSH's prescribed abatement period.
- (5) In the event of a VOSH inspection, be eligible for the maximum good faith penalty reductions (currently 25 percent) available under the existing VOSH penalty assessment policy.
- (6) Be recognized on the DOLI website page as a Tier Three Virginia BUILT participant.

8. Mentor Qualifications and Responsibilities

- a. Mentors shall serve on the VBC and have 5 years minimum experience as a construction safety and health professional and meet the qualifications as defined above.
- b. Mentor responsibilities include:
 - (1) Commit to a minimum one year relationship with the mentee.
 - (2) Conduct an initial mentor-mentee meeting to review safety and health management systems in place and to be developed.
 - (3) Conduct at a minimum a monthly in person or conference call check-up.
 - (4) Provide a quarterly written update to the VBC on mentee progress.

C. Eligibility Requirements

1. The Virginia BUILT program will be implemented in four tiers:

Mentorship Tier: The introductory tier of participation in the partnership for those employers actively working with the ABC-VA Virginia BUILT Council (VBC) to improve their safety and health management systems with the goal of becoming a Tier One participant. Mentorship Tier participants are actively working on developing and implementing an effective safety and health management system that meets current VOSH regulatory requirements.

Tier One The introductory tier of recognition in the partnership for those employers actively working with the ABC-VA Virginia BUILT Council (VBC) and VOSH to improve their safety and health management systems with the goal of becoming a Tier Two participant. The employer has developed and implemented an effective safety and health management system that meets current VOSH regulatory requirements. (SEE ATTACHMENT A FOR TIER ONE REQUIREMENTS AND ATTACHMENT f FOR TIER ONE GUIDANCE).

Tier Two The intermediate tier of recognition in the partnership for those employers that demonstrate outstanding safety and health performance and are actively working with the VBC and VOSH to continuously improve with the goal of becoming a Tier Three participant. The employer has an established safety and health management system that exceeds current VOSH regulatory requirements. Tier Two participants pass on their hard-earned knowledge, experience, and training in construction safety and health management systems by actively mentoring other contractors and subcontractors who want to develop and achieve world class safety and health protections for their employees. (SEE ATTACHMENT B FOR TIER TWO REQUIREMENTS AND ATTACHMENT G FOR TIER TWO GUIDANCE).

Tier Three The highest tier of recognition in the partnership for those employers that consistently demonstrate world class safety and health performance that serves as a model for other construction employers in the Commonwealth. Tier Three participants pass on their hard-earned knowledge, experience, and training in construction safety and health management systems by

proactively mentoring other contractors and subcontractors who want to develop and achieve world class safety and health protections for their employees. (SEE ATTACHMENT C FOR TIER THREE REQUIREMENTS AND ATTACHMENT H FOR TIER THREE GUIDANCE).

2. Minimum Requirements for Tier One, Tier Two, and Tier Three Participants

All applicants for Tiers One, Two, and Three must meet the following minimum requirements:

- a. All applicants must be ABC-VA Safety Training Evaluation Process (STEP) participants.
- b. For the purpose of evaluating the implementation of safety and health management systems, the participant must be a member in good standing of the ABC-VA; and must allow the ABC-VA and VOSH representative(s) access to project sites throughout Virginia, when requested. Coordination for visits will be made with the contractor's participant contact.
- c. Applicant must have a designated safety representative with responsibility for employee safety to administer the applied safety and health program.
- d. Provide for direct employee involvement in safety and health management systems. A safety committee, comprised of company employees and management, or participation of employees in self-inspections, site inspections, job hazard analysis, safety and health program reviews, safety training, and incident investigations would be acceptable.
- e. Maintain a total case injury/illness incidence rate (three-year average) that is below the most current Bureau of Labor Statistics rate for the applicant's North American Industrial Classification System (NAICS) code for the STEP level of the Applicant/Participant (See Table One).
- f. The Applicant must not have been issued final VOSH citations related to a fatality in the preceding three-year period prior to application submission. In the event that the employer elects to contest a citation related to a VOSH fatality, the employer may not submit a VPP application until such time as all fatality-related citations have become a final order of the Commissioner.
- g. The Applicant must have no willful, repeat, or failure to abate violations that became a final order of the Commissioner within the three years prior to application.
- h. The existence of any of the following precludes the company's filing of an application with Virginia BUILT:
 - (1) Open enforcement investigations,
 - (2) Pending or open contested citations or notices under appeal at the time of application,
 - (3) Affirmed willful or antidiscrimination whistleblower violations under § 40.1-51.2:1 of the

Code of Virginia during the 36 months prior to application,

(4) Documented instances of misclassification of employees during the 36 months prior to application, or

(5) Unresolved, outstanding enforcement actions such as long term abatement agreements or contests.

i. Develop, implement, and maintain a prohibited substance policy and conduct and document a random testing program that complies with applicable laws, statutes, and agreements.

3. Applications Process:

Applications may be submitted at any time throughout the year. The process for new applicants is as follows:

a. Complete the Virginia BUILT application form (ATTACHMENT D). The application requests data from the summary of the contractor's OSHA Form 300 Log of Work-Related Injuries and Illnesses.

b. For Tier One, Tier Two and Tier Three applicants, complete the Virginia BUILT SHMS Self-Assessment form (ATTACHMENT E), which includes grading company performance (possible scores of 0, 1, 2 and 3) on the four major safety and health management system elements:

(1) Management Leadership and Employee Involvement

(2) Worksite Analysis

(3) Hazard Prevention and Control

(4) Safety and Health Training

c. Provide the documents specified for the Virginia BUILT Application Tier.

d. ABC-VA will administer the initial application process, review the required program documents, and approve or reject each Mentorship Tier application. VOSH will serve in an advisory capacity on initial Mentorship Tier applications. See below for application review procedures for Tier One, Tier Two, and Tier Three applicants.

e. The initial determination on the level of entry into the program – other than the Mentorship Tier - is based on the applicant's score on the SHMS Self-Assessment worksheet and a review of safety and health management system documentation. To determine the contractor's tier eligibility, the contractor must provide ABC-VA evidence of conformance with each requirement for each tier.

f. Participation tier determination:

(1) Applicants seeking Mentorship Tier status must meet the following requirements:

- i. Applicant must be mentoring or Bronze or Silver STEP participant (see Table One below);
 - ii. Applicant must have a designated safety representative with responsibility for employee safety to administer the applied safety and health program along with conducting jobsite safety inspections;
 - iii. The Applicant's designated safety representative must participate with the regional ABC-VA Safety Committee;
 - iv. Conduct safety and health orientations for all new employees;
 - v. Conduct and document weekly employee safety meetings; and
 - vi. Must provide the required Mentorship Tier Documentation.
- (2) Applicants seeking Tier One status must meet the following requirements:
- i. Applicant must be a Silver STEP participant (see Table One below);
 - ii. Applicant must have a designated safety representative with responsibility for employee safety to administer the applied safety and health program along with conducting jobsite safety inspections;
 - iii. The Applicant's designated safety representative must participate with the regional ABC-VA Safety Committee;
 - iv. Conduct safety and health orientations for all new employees;
 - v. Conduct and document weekly employee safety meetings;
 - vi. Achieve a score of at least 33% on each of the four SHMS elements on the Virginia BUILT SHMS Self-Assessment form (ATTACHMENT E); and provide the required Tier One Documentation. A score of 33% indicates that the applicant is meeting current VOSH regulatory requirements for Tier One participants;
 - vii. Must successfully complete a joint ABC-VA/VOSH Consultation onsite survey on one major worksite during the application process. A copy of the VOSH Consultation onsite survey and results may be requested from the Applicant for inclusion in the Applicant's file;² and
 - viii. ABC-VA will conduct an initial review of Tier One applications for consideration of approval. Deficient applications may be provided additional mentorship to meet Tier

² Consultation Surveys are not releasable in response to a Freedom of Information Act (FOIA) request. See Va. Code §40.1-11 and 16VAC25-60-90.H (NOTE: Employers are not required to provide copies of Consultation surveys as part of the application process.

One requirements or recommended for approval at a lower tier if desired by the applicant and approved by ABC-VA.

(3) Applicants seeking Tier Two status must meet the following requirements:

- i. Must meet the Tier One requirements and be a Gold Level STEP contractor (see Table One below);
- ii. The participant's designated safety and health representative will attend the annual VOSH conference;
- iii. Conduct and document site safety inspections. Site safety inspections must be conducted as often as needed to assure safety but at least on a weekly basis. The size of the job will dictate the frequency of site safety inspections. This requirement applies to the participant contractor and incorporates evaluations of each lower-tier contractor. Safety inspection documentation of the contractor participant shall remain property of the participant contractor;
- iv. Implement a six-foot fall-protection policy for all construction activities;
- v. Maintain a site specific safety and health system for all Virginia sites to ensure any and all unique stations of the site are addressed prior to work beginning;
- vi. Maintain a list on site of all subcontractors including second and third tier contractors for which the Virginia BUILT participant is responsible;
- vii. Achieve a score of at least 67% on each of the four SHMS elements on the Virginia BUILT SHMS Self-Assessment form (ATTACHMENT E); and provide the required Tier One and Tier Two Documentation. A score of 67% indicates that the applicant is meeting current VOSH regulatory requirements for Tier Two participants;
- viii. Must successfully complete a joint ABC-VA/VOSH Consultation onsite survey on two major worksites during the application process. A copy of the VOSH Consultation onsite survey and results may be requested from the Applicant for inclusion in the Applicant's file;³
- ix. ABC-VA will conduct an initial review of Tier Two applications for consideration of approval. Deficient applications may be provided additional mentorship to meet Tier

³ Consultation Surveys are not releasable in response to a Freedom of Information Act (FOIA) request. See Va. Code §40.1-11 and 16VAC25-60-90.H (NOTE: Employers are not required to provide copies of Consultation surveys as part of the application process.

Two requirements or recommended for approval at a lower tier if desired by the applicant and approved by ABC-VA; and

- x. Conditionally approved Tier Two applications will be forwarded to VOSH for review. ABC-VA and VOSH will jointly decide on final approval or rejection of the application.

(3) Applicants seeking Tier Three status must meet the following requirements:

- i. Must meet the mentor and Tier Two requirements and be a Platinum or Diamond STEP contractor (see Table One below);
- ii. Participation of applicants' CEO or Principal in charge of business operation in a formal interview with VBC prior to approval;
- iii. The participant's designated safety and health representative will attend the annual VOSH conference;
- iv. The designated safety representative will provide assistance to VOSH as needed on construction safety and health related initiatives;
- v. Participation in Tier Three will be open to those contractors that have achieved and participated at Tier Two for at least one year;
- vi. Achieve a score of 100% on each of the four SHMS elements on the Virginia BUILT SHMS Self-Assessment form (ATTACHMENT E); and provide the required Tier One, Tier Two, and Tier Three documentation;
- vii. As part of the final approval process, Tier Three participants must successfully complete up to three separate onsite reviews at major worksites by a team consisting of ABC-VA and VOSH personnel (PIV personnel may also be used as part of the onsite review team);
- viii. The Tier Three Onsite review(s) will be conducted in accordance with the procedures contained in the Virginia BUILT Policies and Procedures Manual;
- ix. ABC-VA will conduct an initial review of Tier Three applications for consideration of approval. Deficient applications may be provided additional mentorship to meet Tier Three requirements or recommended for approval at a lower tier if desired by the applicant and approved by ABC-VA;
- x. Conditionally approved Tier Three applications will be forwarded to VOSH for review. ABC-VA and VOSH will jointly decide on final approval of the application; and

Tier Three participants must be recertified every 36 to 48 months in accordance with the procedures contained in the Virginia BUILT Policies and Procedures Manual. Tier Three participants

are also subject to the Annual Eligibility Status Review procedures discussed below.

Table One

STEP ACHIEVEMENT LEVELS	STEP Diamond	STEP Platinum	STEP Gold	STEP Silver/Bronze
TRIR at or below 50 percent of the BLS NAICS code average in each of the previous three data years	●			
TRIR at or below 25 percent of the BLS NAICS code average for the data year		●		
TRIR at or below BLS NAICS code average for the data year			●	
EMR at or below 0.7 beginning Jan. 1 of the application year	●			
EMR at or below 0.8 beginning Jan. 1 of the application year		●		
No lives lost or catastrophic incidents, company-wide, during the application year	●	●		
No lives lost or catastrophic incidents, company-wide, during the previous three years resulting in an OSHA citation	●	●		
Minimum 20 Key Components score	●	●	●	●

4. Annual Report Submission and Review

- a. Participants will submit an annual report by February 15th of each year in accordance with requirements in the Virginia BUILT Policies and Procedure Manual.
- b. The annual report includes assessments of the effectiveness of all elements and sub-elements of the participant's safety and health management system. The report includes injury and illness data for all applicable key subcontractors, success stories, and mentorship activities, if applicable. VOSH uses the information to update records and statistics, to showcase successes related to implementation of the Virginia BUILT requirements, and to demonstrate that participants are committed to continuously improving worker safety and health at their facilities.
- c. Annual Reports for each participant will be reviewed by March 15th by ABC-VA and VOSH to assure that the participant remains eligible to remain in the program. The review will focus primarily on any areas of concern identified in the report as well as new initiatives/best practices, and any VOSH enforcement activity that occurred at the participant's worksites during the previous year. ABC-VA and VOSH reserve the right to consider any other relevant information that may impact the participant's ability to meet the minimum requirements for the applicable participation tier (e.g., change in ownership, continued membership in ABC-VA).
- d. ABC-VA will have primary responsibility for reviewing Mentorship Tier participant reports with VOSH serving in an advisory capacity. If a concern arises, ABC-VA will contact the participant in writing and request corrective action as necessary.
- e. ABC-VA and VOSH will share joint responsibility for reviewing Tier One, Tier Two, and Tier Three reports. If a concern arises, VOSH and ABC-VA will contact the participant in writing and request corrective action as necessary.
- f. If an unresolved serious problem is evident, ABC-VA and VOSH will make arrangements with the participant for an on-site assistance visit.
- g. Where necessary, the procedures on participant withdrawal and termination discussed below will be considered to address unresolved issues.

5. Program Confidentiality

Information submitted by contractors as part of the application or renewal process, as well as information obtained by virtue of the contractor's application or participation in the program, will be held in confidence within the confines of the Virginia BUILT Strategic Partnership Program, and Va. Code §40.1-11. The information will be used only to measure the effectiveness of the program.

However, in the event of a VOSH compliance inspection, information that is relevant to the investigation and normally available (such as company safety and health programs) will be provided to VOSH upon request. Results of self-assessments and self-inspections made by the applicant cannot be used for the purposes of issuing citations.

6. Approval Presentation

- a. Successful Mentorship Tier Applicants will receive a recognition letter signed by ABC-VA and the Virginia BUILT Coordinator and a joint press release will be issued by ABC-VA and VOSH.
- b. Successful Tier One and Tier Two applicants will receive a certificate of recognition signed by the Commissioner of Labor and Industry and the ABC-VA, and presented at a meeting with company officials and employee representatives. A joint press release will be issued by ABC-VA and VOSH, and the participant's accomplishment will be posted on the Virginia BUILT webpage.
- c. Successful Tier Three applicants will receive a Governor's Proclamation and a Virginia BUILT Flag at a flag raising celebration. A joint press release will be issued by ABC-VA and VOSH, and the participant's accomplishment will be posted on the Virginia BUILT webpage.

D. Program Oversight

1. Oversight Committee

- a. A committee consisting of VOSH personnel (2), ABC-VA personnel (2), authorized representatives of employees (2), insurance carriers (1) and at least one representative from an independent third party such as ASSP, AIHA, Virginia Occupational Health Nurses, National or Virginia Safety Council, etc., will be established to review the program and make recommendations to the Commissioner of DOLI and ABC-VA. The committee will meet at least annually. It is anticipated that program changes may be needed early in the process to insure the success and effectiveness of the program. After being briefed by the Committee, the Commissioner of DOLI will decide if changes to the program are needed and act accordingly.
- b. ABC-VA and VOSH will review this partnership at least every third December (three years).
- c. Any party to the partnership may withdraw from Virginia BUILT at any time after submitting its' written notification of intent to the other party.

2. Annual Evaluation

An annual review and evaluation of the program, its policies and procedures, the overall effectiveness of the program, and recommendations for improvement will be conducted by the Oversight Committee.

3. Virginia BUILT Evaluation

- a. It is the responsibility of the VBCEC to gather required participant data to evaluate the overall success of the program.
- b. Virginia BUILT will be evaluated annually. ABC-VA will be responsible for collating baseline and annual performance data upon which the program will be measured. This aggregated data will be reported to VOSH annually.
- c. Participant aggregate injury/illness incidence rates (total case rates) and fatality rates will be compared with BLS published data to determine whether goals have been met at the chapter and/or national level.
- d. Participant incidence of injuries from the hazards that are the four leading causes of death on construction sites (falls, struck-by, caught in/or between, and electrocutions) will be measured and compared against a baseline established in the first year of Virginia BUILT.
- e. ABC-VA and VOSH may revise criteria annually based on recommendations for continual improvement, including any "leading indicators" approved by the Oversight Committee.

4. Participant Suspension

A participant will be automatically suspended from the program during the pendency of an investigation of a fatality at a covered worksite. A participant may be suspended from the program by the Commissioner of Labor and Industry during the pendency of an investigation of a major non-fatal incident at a covered worksite. A participant will be automatically suspended from the program during the pendency of a termination process initiated by either the ABC-VA or VOSH under the procedures in paragraph D.5. below. The timing for reinstatement from the suspension will be at the sole discretion of the Commissioner. The Commissioner or ABC-VA may also move to terminate the participant from the program as provided in paragraph D.5. below.

5. Participant Withdrawal/Termination

- a. Any participant may withdraw from participation in the program at any time.
- b. A participant will be terminated by ABC-VA and VOSH if one or more of the following occurs:
 - (1) An inspection by ABC-VA or VOSH reveals a significant deviation from program requirements (e.g., a pattern of serious violations and/or unabated hazards is identified and verified).
 - (2) The participant has falsified information on the application or supporting records.
 - (3) The participant refuses to cooperate with onsite reviews or requests for prompt abatement of hazards.

- (4) The participant's total case injury/illness incidence rate rises above criteria set in paragraph C.2.e. above (in certain cases, when agreed upon by both ABC-VA and VOSH, the contractor may be reclassified to a lower tier).
 - (5) A willful violation or failure to abate violation is issued by VOSH.
 - (6) The participant engages in a pattern of participating in or allowing misclassification of employees.
 - (7) The contractor takes other such actions that may be determined to be grounds for termination by ABC-VA and/or VOSH.
 - (8) The contractor is no longer a member in good standing with ABC-VA.
- c. Prior to final termination of a participant's status, the following will occur:
- (1) The contractor will be notified in writing of the intent to terminate.
 - (2) The notice will include an explanation of the reasons for termination.
 - (3) The contractor will have an opportunity to reply to the written notice within a period of 30 days and appeal the decision.
 - (4) The contractor will have the right to appeal before ABC-VA and the Commissioner. ABC-VA will conduct an initial review of the appeal and either reject or give conditional approval. For rejected appeals, the decision of the ABC-VA is final. Conditionally approved appeals will be forward to VOSH for review. The Commissioner's decision to approve or reject the appeal will be final.
- d. Any participant may reapply for participation no earlier than one year after termination.

E. Program Marketing and Use of Logos

VOSH strives to provide opportunities for employers and employees to work cooperatively with the Department of Labor and Industry to address and improve workplace safety and health issues. One opportunity is through the Virginia Voluntary Protection Programs (Virginia VPP).

Virginia VPP is VOSH's premiere recognition program designed to recognize participants with exceptional comprehensive safety and health management systems that incorporate strong management commitment and meaningful, active employee involvement. Virginia VPP is open to qualified private and public sector employers in all industries where VOSH has jurisdiction. Participation in Virginia VPP is voluntary, free and non-competitive.

1. Marketing Guidelines for Virginia Voluntary Protection Programs Strategic Partners

Virginia VPP is committed to the principles of honesty, trust, integrity, mutual cooperation, mentorship, continuous improvement, and commitment to sharing best practices. While VOSH continuously seeks ways to grow Virginia VPP to have the broadest possible positive impact on occupational safety and health conditions in the Commonwealth, it is important that VOSH, its strategic partners, and participating companies and sites maintain the highest ethical standards and commitment to VPP principles when marketing Virginia VPP benefits, incentives, application procedures, and program participation requirements. Toward that end, marketing efforts are prohibited from containing any false or potentially misleading information about Virginia VPP, its strategic partners, or its participating companies and sites.

2. Use of Virginia VPP Logos

Virginia VPP logos (e.g., Virginia STAR, Virginia BEST, Virginia CHALLENGE, VADOC CHALLENGE, Virginia BUILT, etc.) are the property of the Commonwealth of Virginia and are not available for general use. Since the logo was developed to help identify and promote the Virginia VPP, VOSH must ensure that the use of the logo remains consistent and does not diminish program integrity. The logo reflects that a product was developed as part of the Virginia VPP for informational purposes only. Use of the logo does not imply official agency approval by either VOSH or the Virginia Department of Labor and Industry and should not be construed as an endorsement of the entity, its products, or services.

Use of Virginia VPP logos is mainly reserved for VOSH and active Virginia VPP participants and strategic partners. The logo may be used by aspiring Virginia VPP applicants if used in the proper context, e.g., used in conjunction with language that clearly indicates the applicant is not an active Virginia VPP participant, e.g., "Working Toward Virginia VPP" or other similar phrase.

ATTACHMENTS

ATTACHMENT A:

Tier One Requirements

The employer has developed and implemented an effective safety and health management system that meets current VOSH regulatory requirements.

ATTACHMENT B:

Tier Two Requirements

The employer has an established safety and health management system that exceeds current VOSH regulatory requirements.

ATTACHMENT C:

Tier Three Requirements

The employer has an exceptional safety and health management system that serves as a model for other construction employers in the Commonwealth.

ATTACHMENT D:

Virginia BUILT Application Form

ATTACHMENT E:

Virginia BUILT SHMS Self-Assessment Form

ATTACHMENT F:

Tier One Guidance

ATTACHMENT G:

Tier Two Guidance

ATTACHMENT H:

Tier Three Guidance

ATTACHMENT A:

Tier One Requirements: The employer has developed and implemented an effective safety and health management system that meets current VOSH regulatory requirements.

Virginia BUILT Tier One Requirements

Management Leadership and Employee Involvement

Management Commitment

Desired Outcomes

1. Senior management has developed and communicated an acceptable Safety and Health Vision Statement.
2. Senior management has developed and communicated an acceptable Safety and Health Mission Statement.
3. Senior management demonstrates visible safety and health leadership.
4. Management has committed adequate resources to the safety and health program.
5. Management has developed and communicated annual safety and health objectives that are clear, attainable, and measurable. Management has clearly identified every employee's responsibility for safety and health.
6. Management has clarified lines of communication and encourages workers to contact senior level management on unresolved safety and health issues.
7. Company has established accountability for safety and health that includes:
 - a. Safety and health responsibilities and accountability are in the job descriptions and performance plans of managers, mid-level supervisors, and designated safety and health staff.
 - b. Authority provided to all persons for achieving safety and health targets.
8. Company has established a disciplinary plan.

Employee Involvement

Desired Outcomes

1. Company has conducted a Safety and Health Perception Survey of all company employees on safety and health culture and practices. Company develops plan to assure that key subcontractors conduct a similar Safety and Health Perception Survey of their employees.
2. Company has reviewed the results of the survey, established an action plan to address the issues, and has begun to make changes in response to the findings.
3. Company has informed all company and subcontractor employees working onsite of their rights and responsibilities under VOSH laws, standards and regulations, of the company's participation in Virginia BUILT and of the fundamental principles of Virginia BUILT.
4. Company has established teams that represent different sectors of the company's staff. Teams have established targets and missions that will effectively contribute to safety and health, such as addressing a particular trend, spreading the word about Virginia BUILT, acting as one avenue to accept employee reports of hazards, etc. Establish a policy/requirement that key subcontractors will participate in company teams, or establish teams in an equivalent manner.

Subcontractor Worker Coverage

Desired Outcomes

1. Company requires that subcontractors provide safety and health protection equal to that received by company employees.
2. Company has established a process for selection of subcontractors.
3. Company has required all subcontractors to adhere to the company's safety and health rules.
4. Subcontractors have systems and processes to identify, correct, and track uncontrolled hazards in their work areas on a timely basis.

Worksite Analysis

Initial Safety and Industrial Hygiene Hazard Analysis

Desired Outcomes

1. Company has conducted an initial Safety and Health Hazard Analysis.
2. Company has conducted a follow-up study if justified by significant change (*e.g.*, changes in processes, equipment, hazard controls, etc.).

Hazard Analysis of Routine Jobs, Tasks, and Processes

Desired Outcomes

1. Company has conducted an initial study for all routine tasks.

Hazard Analysis of Significant Change

Desired Outcomes

1. Company has an effective system for analyzing safety and health hazards including significant changes such as change in tools, equipment, materials, or processes.

Pre-use Analysis

Desired Outcomes

1. Company has an effective system for analyzing safety and health hazards of new equipment, materials and processes.

Routine Self-Inspections

Desired Outcomes

1. Company has an established routine self-inspection program that ensures that safety and health inspections are performed as often as necessary by a competent person.

2. Company employees are trained in the recognition and avoidance of hazards applicable to their work environment and share in the responsibility of routinely inspecting their work area, materials, and equipment for hazards.

Incident Investigations

Desired Outcomes

1. Company has developed and begun implementing a documented system and procedures for incident investigations with key subcontractor involvement.

Hazard Reporting System for Employees

Desired Outcomes

1. Company has begun to develop a system for employees to report hazards.

Trend Analysis

Desired Outcomes

1. Company has conducted a review of injury and illness history for previous three complete calendar years and developed a trend analysis.
2. Company has begun developing a plan for conducting additional trend analyses of other safety and health related information.

Hazard Prevention and Control

Hazard Elimination and Control Methods

Desired Outcomes

1. Company has begun selecting the most appropriate hazard elimination and control methods for identified hazards.

Hazard Control Programs

Desired Outcomes

1. Company has met all minimum requirements regarding the establishment of hazard control programs required by VOSH standards.
2. Hazard controls follow the hierarchy of controls (Engineering, Administrative, Work practice, and Personal Protective Equipment).
3. Company has established other hazard controls programs necessary to protect workers from hazards of work.

Occupational Health Care Program

Desired Outcomes

1. Company has conducted thorough review of OSHA 300 logs, insurance claims, and incident investigations and ensures that all records are complete.
2. Company employees have access to health care services based on results of the initial survey and health analysis including physician and emergency medical care.

Preventive Maintenance of Equipment

Desired Outcomes

1. The company will ensure that equipment is maintained in accordance with the manufacturer's preventive maintenance requirements and require that subcontractors implement an equivalent system.

Tracking of Hazard Correction

Desired Outcomes

1. Company has developed and established a hazard tracking system and required that subcontractors implement an equivalent system.

Emergency Preparedness and Response

Desired Outcomes

1. If necessary, company has provided emergency physician and medical care.
2. Company has established and communicated written emergency procedures.
3. Company provides first aid and CPR or an equally effective alternative.
4. Subcontractors have been required to adopt the company emergency procedures, and participate in company emergency drills and activities, if appropriate for the jobsite.

Safety and Health Training

Desired Outcomes

1. Safety and health training as required.
2. Company managers, supervisors, and non-supervisory employees are:
 - a. Aware of their rights and responsibilities under VOSH laws, standards and regulations, what Virginia BUILT is about, and fundamental Virginia BUILT principles. Able to recognize unsafe conditions and are familiar with the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.
 - b. Familiar with emergency evacuation procedures and their specific responsibilities for each type of emergency.

3. Company and subcontractor managers and supervisors have specific knowledge of their safety and health roles and responsibilities including knowledge of ways they can improve safety and health conditions for their workplaces.
4. Company has designated staff who have assigned safety and health responsibilities and have the knowledge and skills they need to perform the tasks assigned to them

Documentation

Minimum Required Documentation

1. Mission statement
2. The most recent annual safety and health objectives
3. Accountability plan
4. Budget documents showing allocated resources for safety and health
5. Disciplinary Plan
6. Contract selection requirements
7. Accurate and up to date records of injury and illness for the previous three calendar years including:
 - OSHA 300 logs
 - Insurance claim forms
 - Incident reports
8. Initial hazard analysis results
9. Written hazard control programs
10. Incident investigation forms and reports
11. Written subcontractor policies for this Tier
12. Safety and Health Perception Survey form
13. Results of Safety and Health Perception Survey and plan for addressing changes
14. Trend analysis results
15. Incident investigation procedures
16. Hazard correction plan
17. Hazard correction tracking system
18. Preventive maintenance program
19. Written emergency procedures
20. Training records

ATTACHMENT B:

Tier Two Requirements:

The employer has an established safety and health management system that exceeds current VOSH regulatory requirements.

Virginia BUILT Tier Two Requirements

Management Leadership and Employee Involvement

Management Commitment

Desired Outcomes

1. Company employees are aware of and support the Safety and Health Vision Statement.
2. In addition to senior management, all key subcontractor managers and supervisors are also demonstrating visible safety and health leadership.
3. Management has committed adequate resources to the safety and health program.
4. Management continues to improve and strengthen the integration of safety and health into existing planning processes.
5. Management, in conjunction with the employees, continues to develop and communicate annual safety and health objectives that are clear and attainable.
6. Employees are communicating with management more openly on safety and health issues.
7. Managers, supervisors, and non-supervisory employees clearly understand their responsibilities and accountability for safety and health.
8. Persons identified as being accountable for meeting safety and health objectives believe they have adequate authority and support to do their job. Other workers recognize these persons' authority and are beginning to support them.
9. Managers, supervisors, and specific safety and health staff are monitored and evaluated on their safety and health performance.
10. Safety and health responsibilities and accountability are included in performance plans of managers, mid-level supervisors, and designated safety and health staff.
11. Company is implementing a disciplinary plan for non-supervisory employees and key subcontractor employees.
12. Company is developing the written plans necessary for performing effective annual safety and health evaluations.

Employee Involvement

Desired Outcomes

1. The company can demonstrate significant improvement in its safety and health practices in terms of employee involvement, attitudes, and hazard-reporting, their compliance with rules and standards, and their acceptance of safety and health roles and responsibilities.
2. Safety and health teams are active and additional teams are formed as needed.
3. More employees participate in safety and health activities together with designated safety and health staff.

4. Company has incorporated into its orientation training for new employees all the information that is required to be shared with employees.

Subcontractor Worker Coverage

Desired Outcomes

1. Company routinely uses safety and health factors, such as written safety and health management systems, injury and illness rates, in selecting and overseeing subcontractors.
2. Company and key subcontractors can demonstrate an improvement in timely identification, correction, and tracking of uncontrolled hazards in key subcontractors' work areas.
3. Company has an established process to monitor subcontractor compliance and to remove subcontractors for safety or health violations and has made subcontractors aware of this process.

Worksite Analysis

Health Initial Hazard Analysis

Desired Outcomes

1. Key Subcontractors are performing and submitting initial health hazard analysis of the work they are contracted to perform based on their previous work and exposures.

Hazard Analysis of Routine Jobs, Tasks, and Processes

Desired Outcomes

1. Company has conducted hazard analysis of routine jobs, tasks, and processes. Key subcontractors are beginning to perform hazard analysis of routine jobs, tasks, and processes.

Hazard Analysis of Significant Changes

Desired Outcomes

1. Company uses an effective system for analyzing the potential hazards of significant changes.

Pre-Use Analysis

Desired Outcomes

1. Company has an effective system for analyzing safety and health hazards of new equipment, materials and processes.

Health Program

Desired Outcomes

1. Company has developed a written health program. Key subcontractors implement equivalent program for the work they are contracted to perform
2. Company and key subcontractors have begun implementing controls for hazards identified in the initial study.
3. Company and key subcontractors have established and implemented sampling methodology and strategies.
4. Company has conducted and Key Subcontractors have begun conducting the necessary health surveys.

Routine Self-inspections

Desired Outcomes

1. Company has developed a documented routine self-inspection system.
2. Acceptable routine self-inspections have been conducted, as often as necessary but no less than once a week.
3. The entire worksite, including subcontractor work areas, is inspected as often as necessary, but no less than weekly.
4. Subcontractors have begun performing frequent and regular inspections of the work activities in areas they are responsible for.

Hazard Reporting System for Employees

Desired Outcomes

1. Company has developed and begun implementing a documented hazard-reporting system.
2. Key subcontractors have begun implementing a documented employee hazard reporting system for the work activities and areas they are contracted to perform.

Investigation of Incidents and Near-Hit Incidents

Desired Outcomes

1. Company and key subcontractors have expanded the system and process developed in Mentorship Tier for incident investigation to include near-hit incidents.
2. If applicable, company and key subcontractors have conducted acceptable investigations of incidents and near-hit incidents.

Trend Analysis

Desired Outcomes

1. Company conducts a trend analysis of injuries and illnesses at least annually.
2. Company has conducts a trend analysis of the other safety and health information in addition to injury and illness history.

3. Key subcontractors are beginning to trend injury and illness information and other safety and health performance information.

Hazard Prevention and Control

Hazard Elimination and Control Methods

Desired Outcomes

1. Company and subcontractors have begun selecting the most appropriate hazard elimination and control methods for identified hazards.
2. Hazard controls follow the hierarchy of controls (engineering, administrative, work practice, and PPE).
3. Top priority hazards are controlled before progressing to Tier Two. For hazards requiring long-term abatement projects, interim protection is acceptable.

Hazard Control Programs

Desired Outcomes

1. Company and subcontractors continue to implement and improve hazard control programs required by VOSH standards.
2. Company and subcontractors continue to train workers on these programs as needed.

Tracking of Hazard Correction

Desired Outcomes

1. Company continues to implement and improve the hazard tracking system.

Preventive Maintenance of Equipment

Desired Outcomes

2. The company will ensure that equipment is maintained in accordance with the manufacturer's preventive maintenance requirements and require that key subcontractors implement an equivalent system.

Occupational Health Care Program

Desired Outcomes

1. Company and subcontractor employees have access to health care services based on results of the initial survey and health analysis including physician and emergency medical care.

Emergency Preparedness and Response

Desired Outcomes

1. Company and subcontractors continue to communicate the written procedures for responding to emergencies.
2. Dependent upon project size or complexity, conduct at least one evacuation drill and assess how well the procedures worked.
3. Company and subcontractors have established emergency response procedures.
4. Company and subcontractors provide first aid and CPR, or an alternative at least as effective.

Safety and Health Training

Desired Outcomes

1. Continue to meet outcomes specified in the Mentorship Tier.

Documentation

Minimum Required Documentation

1. All documentation required in the Mentorship Tier, plus:
2. Job Hazard Analysis forms and records.
3. Routine self-inspection forms and records.
4. Employee hazard reporting procedure and forms.
5. Documentation of activities by safety and health teams.
6. Subcontractor program documentation is updated to include additional policies established in this Tier.
7. Trend analysis procedure and reports.
8. Written health program and any sampling results since the initial survey.
9. Documentation showing implementation of hazard controls and their effectiveness (*i.e.*, ventilation studies, PPE purchases, machine guarding purchases).
10. Preventive maintenance schedule from manufacturer or as developed by the employer.
11. Emergency procedures updated since Mentorship Tier.
12. Training records.
13. Revised safety and health objectives.
14. Annual self-evaluation procedure.
15. Policy on subcontractor removal.
16. Key subcontractor documentation:
 - a. Safety and health program
 - b. Inspection reports
 - c. Incident reports
 - d. Correction tracking reports

ATTACHMENT C:

Tier Three Requirements:

The employer has an exceptional safety and health management system that serves as a model for other construction employers in the Commonwealth.

Virginia BUILT Tier Three Requirements

Management Leadership and Employee Involvement

Management Commitment

Desired Outcomes

1. All employees are aware of the company's Safety and Health Vision Statement.
2. Senior management accepts ultimate responsibility for safety and health in the organization even if safety and health functions are delegated to others.
3. Individuals assigned responsibility for safety and health have the authority to ensure that hazards are corrected or necessary changes to the safety and health management system are made.
4. Management promotes the use of dedicated resources for safety and health.
5. The company's written safety and health management system addresses the scope and complexity of the hazards.
6. Safety and health responsibilities and accountability are included in the performance plans of managers, mid-level supervisors, designated safety and health staff, and non-supervisory employees. The performance of these responsibilities is routinely measured in the scheduled individual performance appraisal.
7. Key subcontractors have consistently and equitably implemented disciplinary plans.
8. Key subcontractors have acceptable plans for conducting an annual evaluation of their safety and health management system.

Employee Involvement

Desired Outcomes

1. Employees support the company's participation in the Virginia BUILT process.
2. Employees feel free to participate in the safety and health management system without fear of discrimination or reprisal.
3. Employees have access to results of self-inspections, incident investigations, their personal medical records, and personal sampling data upon request.
4. Employees are involved in the safety and health management system in at least three meaningful, constructive ways in addition to the exercise of their right to report a hazard.

Subcontractor Worker Coverage

Desired Outcomes

1. Company and key subcontractors can demonstrate a significant rise in the quality of safety and health protection given to key subcontractor workers, as reported in employee interviews.
2. Company and key subcontractors can demonstrate a significant rise in the level of compliance by key subcontractor workers with the company's safety and health rules.

3. Key subcontractors support the company's participation in the Virginia BUILT process.
4. The company's subcontractor program covers the prompt correction and control of hazards in the event that the subcontractor fails to correct or control such hazards.
5. The subcontractor oversight includes:
 - a. Safety and health protection provided to subcontractor employees.
 - b. Rise in the level of compliance by subcontractor workers with the company's safety and health rules.
 - c. Safety and health performance included in the subcontractor selection process.
 - d. Monitoring and correction of hazards in subcontractor's work areas.
 - e. Enforcement of penalties including removal for safety and health violations if necessary.

Worksite Analysis

Initial Safety and Health Hazard Analysis

Desired Outcomes

1. Company and key subcontractors conduct safety and health hazard analyses, as needed.
2. Company and key subcontractors have been effective in the following:
 - a. Identifying and documenting the common safety and health hazards associated with the work contracted
 - b. Hazard analysis system in place for routine operations, non-routine operations, and significant changes.
 - c. Performing safety and health inspections.
 - d. Conducting incident investigations, including near-hit incidents.
 - e. A system for employees to report hazards and have these hazards addressed.
 - f. A means for identifying and assessing trends.

Hazard Prevention and Control

Hazard Elimination and Control Methods

Desired Outcomes

1. Company and key subcontractors have implemented controls to prevent exposing employees to hazards.
2. Company and key subcontractors have implemented a tracking system that results in hazards being controlled.
3. Company and key subcontractors have implemented written procedures for emergencies.

Safety and Health Training

Desired Outcomes

5. Training provided complies with established safety and health standards.
6. Company and subcontractors provide effective training to educate employees regarding the known hazards of the work.

Documentation

Minimum Required Documentation

1. All documentation from Tier One and Tier Two completed and updated.
2. Hazard analysis form showing analysis of tasks and significant changes.
3. Pre-use analysis forms and results.
4. Annual self-evaluation of the company's safety and health management system.
5. Follow up safety and health perception survey and results.

ATTACHMENT D:

Virginia BUILT Application Form



Virginia BUILT Application

Submitted to:
Associated Builders and Contractors of Virginia
Virginia BUILT Program
42680 Trade West Drive
Dulles, Virginia 20166
Attn: Mr. Pat Dean

Application Instructions

Please fill in the spaces provided. Each element has a link that will take you to the element requirements. Your answers must meet the requirements.

Previous application forms will not be accepted, only this application form should be used.

The BUILT Assurances at the end of the application must be completed and submitted with the application.

Helpful Websites

BLS Industry & Illness Rates	http://www.bls.gov/iif/oshwc/osh/os/ostb4343.pdf
OSHA Memo #5	https://www.osha.gov/vpp/policy-memo5
Virginia BUILT	http://doli.virginia.gov/vosh_enforcement/BUILT_program.html
NAICS codes	http://www.census.gov/eos/www/naics

Attachments

Instructions: List any attachments here. Please list each attachment and label the attachment with the element that is referred to. Add as many as needed. See each individual element for requirements.

1	
2	
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8	
9	
10	
11	
12	

What Tier Level are you apply for?	Choose an item.
---	-----------------

Company Information

Prepared By		Title	
--------------------	--	--------------	--

Company Name:			
NAICS Code		FEIN:	
Va. Contractor License Number:			
Mailing Address:			
Physical Address: (If different)			
# of Employees Company Wide:			

BUILT Contact Information

Name:		Title	
E-Mail:			
Phone:		Fax:	
		Length of Time with Company	
Name of Designated Safety Representative (DSR) (if different from Company Contact)			
Does the DSR meet the following requirements?	<ul style="list-style-type: none"> • 5 years of S&H Construction experience with minimum 50% of their responsibility is safety, and at least one of the below qualifications approved by the VBCEC, • A Bachelors or greater degree in an Occupational Safety & Health related field, or • A current professional safety certification form a nationally recognized and accredited organization, or • A combination of construction safety & health training and professional experience 		Choose an item.

Company History

In the last 36 months, have there been any of the following at any of the applying company sites? Check box if applicable			
<input type="checkbox"/>	Fatality	<input type="checkbox"/>	In-Patient Hospitalization
<input type="checkbox"/>	Amputations	<input type="checkbox"/>	Loss of an eye
If you checked yes to any of the above, did the investigation result in serious or willful citations related to the incident?			
In the last 36 months, has there been any willful, repeat or failure to abate violations that became final for the company applying?			

If applicable

Union Information – If more than 1, list each one separately					
Union Name and Local Number:					
Site Rep and Title					
Address:					
Phone:		Fax:		E-Mail:	

Union Information – additional					
Union Name and Local Number:					
Site Rep and Title					
Address:					
Phone:		Fax:		E-Mail:	

Recordable Injury Plus Illness Case Incident Rates

Table 1 - Records the TCIR (Total Case Incident Rate) and DART (Days Away from work, Restricted work activity, and/or job Transfer).

Table 1 – TCIR (Total Case Incident Rate) Employee Data, Past 3 Years

NAICS:	
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(Double Click on chart to activate)

Year	Hours	Total Cases	Total Case Incident Rate (TCIR)	Days Away, Restricted, Transferred Cases	Days Away, Restricted or Transferred Rate (DART)
2017			#DIV/0!		#DIV/0!
2018			#DIV/0!		#DIV/0!
2019			#DIV/0!		#DIV/0!
<i>TOTAL</i>	<i>0</i>	<i>0</i>		<i>0</i>	
<i>Three Year Average Rates</i>			#DIV/0!		#DIV/0!
Most recently published **BLS rates					
<i>Percent above / (below) BLS rate</i>			#DIV/0!		#DIV/0!

Management Leadership and Employee Involvement

Management Leadership

1. Management Commitment and Leadership

Attach a copy of the company's Safety & Health *Vision Statement*.
Attach a copy of the company's Safety & Health *Mission Statement*.

2. Management Resources

Describe how management commits needed resources to safety & health.

3. Visible Leadership

Describe how senior management demonstrates visible safety & health leadership.

4. Communications

Please explain how management has developed and communicated annual safety & health objectives that are clear, attainable, and measurable.

5. Responsibility and Authority

Define how management has clarified lines of communication & encourages workers to contact senior level management on unresolved health & safety issues.

6. Accountability

Describe how your company has established accountability for health & safety. (Examples may include: safety & health accountability in job descriptions, performance plans for managers, mid-level managers/supervisors and or designated safety & health staff)

7. Discipline

Please describe your company's established disciplinary program, to include any stand-alone safety components.

Employee Involvement

1.	<u>Perception Survey</u> Has the company conducted a safety & health perception survey of all employees on safety and health culture & practices? Describe any changes that were initiated in regards to employee perceptions or comments.	Choose an item.
2.	<u>Employee Involvement</u> Describe how employees, including new hires are involved in the safety and health program. Include how employees have access to the results of inspections, accident investigations, medical records and personal sampling data upon request.	
3.	<u>Employee Knowledge and Notification</u> Describe the methods used to ensure that all employees, including newly hired/transferred employees are initially and annually provided awareness of the company's participation in Virginia BUILT, an employee's right to file a complaint with OSHA, and an employee's right to receive the results of self-inspections and accident investigation, upon request	
4.	<u>Rights and Responsibilities</u> How have all employees and key subcontractors been informed of their rights & responsibilities under VOSH laws, standards, regulations and the company's participation in the Virginia BUILT Program?	
5.	<u>Contractors</u> Explain how the company requires key subcontractors to provide safety & health protection equal to that received by your company employees.(Tier II and Tier III only)	
6.	<u>Contractor Use</u> Explain the company's established process for the selection of key subcontractors.	
7.	<u>Contractor Practices</u> Explain how the company ensures key subcontractors have a system and process in place to identify, correct, and track uncontrolled hazards in the workplace.	

8.	<u>Key Subcontractor Injury and Illness Data</u> Explain the methods used to ensure that all injuries and illnesses occurring during work performed under a contract are recorded and submitted to the company's safety and health staff. How does the site verify the key subcontractor injury and illness data and ensure it is included in the company's report?
9.	<u>Mentorship Program</u> Explain if the company has an in-house mentorship program or are in the process of developing one. How many employees are involved in the program?
10.	<u>Union Participation</u> Explain union involvement if any, in the health and safety program.

Worksite Analysis	
1.	<u>Initial Analysis</u> Please describe the company's initial safety & health hazard analysis and any follow-up studies that may have been justified.
2.	<u>Hazard Analysis of Routine Jobs, Tasks, and Processes</u> State how the site reviews jobs, processes and/or the interaction among activities to determine safe work procedures at your worksite
3.	<u>Hazard Analysis of Significant Changes, New Processes, and Non-Routine Tasks</u> Describe the company's process for analyzing safety & health hazards, including significant changes to tools, equipment, materials, processes, or new safety and health standards.
4.	<u>Pre-Use Analysis</u> Explain your company's system for analyzing safety & health hazards of new equipment, materials and processes.
5.	<u>Routine Inspections</u> Explain your established routine safety & health inspection program for company worksites and equipment.

6.	<u>Investigation of Accident and Incidents</u> Please explain the company’s documentation system for accident and incident investigations (including injuries, illnesses, near miss, near hit, property damage, and equipment/vehicle accidents).
7.	<u>Hazard Reporting</u> Explain the system that allows employees to report hazards.

Hazard Prevention and Control

1.	<u>Controls</u> Describe how the company selects the most appropriate hazard elimination & control methods for identified hazards.	
2.	<u>Hazard Control Programs</u> Please describe how the company meets all the minimum requirements regarding OSHA required programs the establishment of hazard control programs.	
3.	<u>Hierarchy of Controls</u> Do hazard controls follow the hierarchy of controls? Explain	Choose an item.
4.	<u>Occupational Healthcare Program</u> Are employees included in any health monitoring programs for exposures to air contaminants or noise? Are there employees that are required to wear respiratory protection during any worksite activity? Explain how you conduct a thorough review of OSHA 300 logs, insurance claims and incident investigations to ensure all records are complete.	
5.	<u>Health Care</u> Describe the access company employees have to health care services based on results of initial health surveys to include physician & emergency medical care.	

6.	<u>Preventative Maintenance</u> Explain how the company ensures all equipment is being maintained in accordance with manufacturer's preventative maintenance requirements?	
7.	<u>Hazard Tracking</u> Please explain how the company systematically tracks hazards found during routine inspections, reported by employees, and noted by third parties.	
	Does the company require key subcontractors to implement an equivalent system?	Choose an item.

8.	<u>Emergency Preparedness & Response</u>	
	If necessary, has the company provided arrangements for emergency medical care?	Choose an item.
	Has the company established & communicated written emergency procedures?	Choose an item.
	Does the company conduct emergency drills at least annually, ensuring all employees participate or are at least briefed on each drill?	Choose an item.
	Is there at least one first aid & CPR trained employee on every jobsite?	Choose an item.
	If appropriate, are key subcontractors required to participate in emergency drills?	Choose an item.

Safety and Health Training		
1.	<u>Formal and Informal Training</u> Briefly describe the required subject matter and methods for completing safety & health training for your company.	
2.	<u>Evaluation of Training</u> Describe how often and in what way training courses are evaluated and updated?	
3.	<u>Confirmation of Training</u> Describe the system used to ensure employees understand and retain course information and the effectiveness of the training	

4.	<p><u>Training Records</u> What format are training records kept for the company?</p>
5.	<p><u>Training Frequency</u> Describe the frequency of the required training. What requirements prompt repeat training?</p>
6.	<p><u>Key Subcontractor Training</u> Describe the safety and health orientation provided for key subcontractors.</p>
7.	<p><u>Hazard Recognition Training</u> Explain how company managers, supervisors, and non-supervisory employees have been trained to recognize unsafe conditions.</p>
8.	<p><u>Emergency Action Training</u> Explain the process to familiarize company managers, supervisors, and non-supervisory employees to understand their duties and responsibilities during emergencies.</p>

Letter below

Virginia BUILT Assurances

Company Name

Date

Agrees to comply with the following items as a Virginia BUILT Program participant:

1. Compliance

- a. The company will comply with the Occupational Safety and Health Act (OSH Act) and correct, in a timely manner, all hazards discovered through self-inspections, employee notifications, accident investigations, VOSH onsite reviews, process hazard reviews, annual evaluations, or any other means.

2. Correction of Deficiencies

- a. The company will correct safety and health deficiencies related to compliance with VOSH requirements.

3. Employee Support

- a. Our employees support the Virginia BUILT application. At sites with contractor employees organized into one or more collective bargaining units, the authorized representative for each collective bargaining unit must submit a signed statement indicating that the collective bargaining agent(s) support BUILT participation. VOSH must receive concurrence from all such authorized agents to accept the application. At non-union sites, the VOSH onsite review team will verify management's assurance of employee support during employee interviews.

4. BUILT Elements

- a. Virginia BUILT elements are in place, and management commits to establishing, meeting, and maintaining the requirements of the elements and the overall Virginia BUILT elements.

5. Orientation

- a. Employees, including newly hired employees and contract employees, will receive orientation on the BUILT, including employee rights under Virginia BUILT and under the OSH Act.

6. Non-Discrimination

- a. We will protect employees given safety and health duties as part of your safety and health program from discriminatory actions resulting from their carrying out such duties, just as Section 40.1-51.2:1 of the Code of Virginia and protect employees who exercise their rights.

7. Employee Access

- a. Employees will have access to the results of self-inspections, accident investigations, and other safety and health data upon request. At sites where they have union representation, this requirement may be met through employee representative access to these results.

8. Documentation

- a. We will maintain our safety and health program information and make it available for VOSH review to determine initial and continued approval to the Virginia BUILT. This information will include:

- i. Any agreements between management and collective bargaining agent(s) concerning safety and health.
- ii. All documentation enumerated under Section III.J.4 of the July 24, 2000 Federal Register Notice.

9. Annual Submission

- a. Each year by February 15, you will submit the following information to the VBCEC - VBC Executive Committee and the Virginia BUILT Coordinator
 - i. For the previous calendar year, the TCIR for injuries plus illnesses, and the DART rates.
 - ii. The total number of cases for each of the above two rates.
 - iii. Hours worked and estimated average employment for the past full calendar year.

10. Key Subcontractor Rates

- a. You will submit data on each applicable key subcontractor. Applicable key subcontractors are those employers who have contracted with your company to perform certain jobs and whose employees worked a total of 1,000 or more hours in at least one calendar quarter at your company’s worksites. The data will consist of:
 - i. The site’s TCIR and DART rate for each applicable key subcontractor’s employees.
 - ii. The total number of cases from which these two rates were derived.
 - iii. Hours worked and estimated average employment for the past full calendar year.
 - iv. The appropriate NAICS code for each applicable key subcontractor’s work at the site.

11. Annual Self-Evaluation

- a. A copy of the most recent safety and health annual evaluation. Include a description of any success stories, such as reductions in workers’ compensation rates, increased in employee involvement, and improvements in employee morale. Due by February 15 of each year to the Virginia VPP BUILT Coordinator.

12. Organizational Changes

- a. Whenever significant organizational or ownership changes occur, we will provide VOSH, within 60 days, a new Letter of Assurance signed by both management and any authorized collective bargaining agents.

13. Collective Bargaining Changes

- a. Whenever a change occurs in the authorized collective bargaining agent, you will provide VOSH, within 60 days, a new signed statement indicating that the new representative supports BUILT participation.

Signature of Company Official
(Owner, President, Site Manager, Etc.)

Date

Appendix

Definitions

- **FEIN:** An Employer identification Number (EIN) is also known as a Federal tax identification Number, and is used to identify a business entity.
- **NAICS Code:** The North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy.
- **DSR:** Designated Safety Representative (DSR) Must meet the following requirements to be considered a DSR:
 - 5 years of S&H Construction experience with minimum 50% of their responsibility is safety, and
 - A Bachelors or greater degree in an Occupational Safety & Health related field, or
 - A current professional safety certification form a nationally recognized and accredited organization, or
 - A combination of construction safety & health training and professional experience approved by the VBC
- **Key Subcontractor:** Key subcontractors are those employers who have contracted with you to perform certain jobs and whose employees worked a total of 1,000 or more hours in at least one calendar quarter at your worksites.

ELEMENTS

1. Management Commitment and Leadership

- Attached a copy of the company Safety & Health Vision and Mission Statements

2. Management Resources

- Describe how your company's management has committed resources to safety and health. Commitment can be displayed in many different and meaningful ways. Examples could be a budget line item for safety & health, allowing employees to meet during the workday for committee meetings, hiring safety professionals, supporting employees attending offsite training, etc. ([Click here to return](#))

3. Visible Leadership

- Describe the ways top management is visibly involved in the safety and health program such as wearing any required personal protective equipment, reporting hazards, reporting injuries and illnesses, following the same safety and health procedures expected for all employees at the workplace, and subjecting managers and employees to the same disciplinary system for infractions. ([Click here to return](#))

4. Communications

- Describe the methods used to communicate policies, goals and objectives with all employees and how the site created an environment that allows for reasonable employee access to site management and senior management. How does the site communicate goals and objectives to all employees? ([Click here to return](#))

5. Responsibility and Authority

- Describe how the company has communicated the responsibility and authority to its employees to contact senior management on unresolved safety & health issues. Explain how this has been accomplished. ([Click here to return](#))

6. Accountability

- Explain how management has established accountability for health & safety. This could be attained by job descriptions, performance plans for managers, mid-level managers/supervisors and or designated safety & health staff). ([Click here to return](#))

7. Discipline

- Describe the company's documented disciplinary plan. Also, include any "stand alone" type disciplinary plans for safety & health such as cardinal safety rules, safety work rules, or other safety & health related discipline. ([Click here to return](#))

Employee Involvement

1. Employee Perception Survey

- Was a perception survey completed?

2. Employee Involvement

- Discuss how employees, including new hires, are involved in the safety and health management system. Do employees have access to the results of inspections, accident investigations, medical records and personal sampling data upon request?
- List at least three active and meaningful ways employees are involved in your program other than hazard reporting.
- Provide specific information concerning employee involvement in decision-making. This would include problem resolution, hazard analyses, accident investigations, safety and health training, or evaluation of the safety and health program.
- ([Click here to return](#))

3. Employee Knowledge and Notification

- Describe the methods used to ensure that all employees, including newly hired/transferred employees, are initially and annually provided awareness of the following:

- The company's participation in Virginia BUILT
- An employee's right to file a complaint with OSHA, and
- An employee's right to receive the results of self-inspections and accident investigation, upon request ([Click here to return](#))

4. Rights and Responsibilities

- Explain how all employees are informed of employees and sub-contractors of their rights and responsibilities under VOSH laws, standards, regulations, and participation in the BUILT Program.

5. Key sub key subcontractor

- Explain the oversight and management system for key subcontractors to ensure the key subcontractors' employees are provided effective protection and follow the company's safety and health policy.
- Discuss the procedure used when a key subcontractor is found in violation of a Safety and Health policy. ([Click here to return](#))

6. Key sub key subcontractor Use

- Discuss how key subcontractors are selected to perform work on site? (If using rate, specify the rates used and cut off levels). Describe how their past performance in safety and health is taken into account in the bidding process.

7. Key sub key subcontractor Practices

- Describe the means to ensure prompt correction and/or control of hazards, however detected, under a key subcontractor's control?

8. Key subcontractor Injury and Illness Data

- Describe the methods used to ensure that all injuries and illnesses occurring during work performed under a contract are recorded and submitted to the company's site safety and health staff.
- How does the company verify the key subcontractor injury and illness data and is it included in the company's report?
- What happens if the key subcontractors TCIR or DART rate increases annually? ([Click here to return](#))

9. Mentorship Program

- Explain if the company has an in-house mentorship program or are in the process of developing one. How many employees are involved in the program and the tier they are currently in.

10. Union Participation

- How is the union(s) involved in the safety program? Do they help with policy development, onsite inspections, etc.?

-

Worksite Analysis

Annual Self-Evaluation of the SHMS

- The company must complete an annual self-evaluation that includes a written narrative with recommendations for timely improvements, assignment of responsibility for those improvements, and documentation of timely follow-up action or the reason no action was taken. Who conducts the evaluation and how were they trained to perform an evaluation? Are the results shared with employees and how? ([Click here to return](#))

Indicators Used to Measure Progress

- What indicators does the company use to measure progress toward safety and health goals and objectives, effectiveness of hazard controls and overall effectiveness of the safety and health management system? Explain the rationale behind the selection of indicator, the method, frequency, and responsibility for monitoring or measuring each indicator. The periodic review of the indicator suitability, methods used to keep records, the analysis, interpretation, and communication of results. ([Click here to return](#))

1. Initial Analysis

- Describe the methods used for initial determination of safety and health hazards (noise, air contaminants)
 - Include baseline industrial hygiene surveys, comprehensive safety surveys, machine guarding surveys, radiological survey/exposure mapping, etc.
 - Provide evidence that the surveyors were qualified to perform the work([Click here to return](#))
- 2. Hazard Analysis of Routine Jobs, Tasks, and Processes**
- State how the company reviews jobs, processes and/or the interaction among activities to determine safe work procedures at company worksite.
 - Describe how results from analyses, such as job hazard analyses, are used in training employees to do their jobs safely and in planning and implementing the hazard correction and control program. Explain how the results improve work practices. Describe the frequency of these analyses and provide supporting documentation
 - Describe how you decide which processes to analyze first. ([Click here to return](#))
- 3. Hazard Analysis of Significant Changes, New Processes, and Non-Routine Tasks (Including Pre-Use Analysis and New Baselines)**
- Pre-Use Analysis: When considering new equipment, chemicals, or significantly different operations or procedures is, an analysis completed to address any concerns or hazards that might be created. Does the analysis address each step, hazard controls, dates conducted, recommendations for improvements, documented, included in training and the hazard control program? ([Click here to return](#))
- 4. Routine Self-Inspections**
- Describe the system used to conduct routine, general worksite safety and health inspections. Include schedules and types of inspections, the qualifications of those conducting the inspections, and how corrections are tracked to completion.
 - Describe the system for inspecting the each site weekly. ([Click here to return](#))
- 5. Investigation of Accidents and Near Misses**
- Describe the system used to conduct accident and incident investigations.
 - Describe training and/or guidance given to investigators; provide criteria used for deciding which accidents/incidents will be investigated.
 - Describe how near-miss incidents are handled. How many have been received? Is this information being trended?
 - Describe the “lessons learned” process being used and demonstrate root cause analyses.
 - Describe method of tracking recommendations and corrections to completion.([Click here to return](#))
- 6. Hazard Reporting System for Employees**
- Describe the system employees use to report hazards. Does it include protection from reprisal, timely and adequate response, and correction of identified hazards? Describe if your program has an anonymous factor.
 - Describe how “imminent danger” situations are reported by employees and handled by management.
 - Describe how corrections are tracked to completion. ([Click here to return](#))

Hazard Prevention and Control

Trend Analysis

- Describe the system(s) used to conduct trend analyses of all data generated by the safety and health program, include employee reports of hazards, first aid incidents, near miss reports, hazard assessment data and injury and illness experience data.
- Describe how the results of the trend analyses are disseminated and used by the line organizations.([Click here to return](#))

1. Controls

- Describes how your company selects the most appropriate methods for identified hazards
- 2. Hazard Elimination and Control Methods**
- Describe the different types of controls that are used at the company and have any follow-up studies been conducted based on incidents, inspections or recommendations from employees?
 - **Engineering Controls**
 - Engineering controls directly eliminate a hazard by such means as substituting a less hazardous substance, isolating the hazard; these are the most reliable and effective. Describe and provide examples of engineering controls have been implemented at the site?
 - **Administrative Controls**
 - Administrative controls significantly limit daily exposure to hazards by control or manipulation of the work schedule or work habits. (Example: job rotation) Describe ways you limit daily exposure to hazards by adjusting work schedules or work tasks.
 - **Work Practice Controls**
 - These controls include workplace rules, safe and healthful work practices, personal hygiene, housekeeping and maintenance, OSHA required programs (i.e., PPE, LOTO, Confined Space Entry, etc.). List the written occupational safety and health programs implemented at your company worksites. ([Click here to return](#))
 - **Personal Protective Equipment**
 - PPE should only be used when all other hazard controls have been exhausted or more significant hazard controls are not feasible. Describe the requirements for selecting, using, maintaining, and distributing personal protective equipment?
 - Describe if there is a complete PPE hazard assessment completed. ([Click here to return](#))
- 3. Occupational Health Care Program**
- Explain how OSHA 300 logs, insurance claims and incidents are reviewed to ensure all records are complete.
 - Describe how the site integrates the employee medical program with the safety and health program.
 - Describe the availability of both onsite and offsite medical services and physicians.
 - Are employees trained in First Aid, CPR, is there an AED on site? What type of training did employee receive?
 - Describe how licensed occupational health professionals are involved in routine hazard analyses, in recognizing and treating injuries and illnesses early on, in limiting severity of harm and in managing injury and illness cases. ([Click here to return](#))
- 4. Health Care**
- Describe how employees have access to health care services based on results of initial health surveys to include physician and emergency care.
- 5. Preventive Maintenance of Equipment**
- Summarize and briefly describe the procedures in use for preventive maintenance of equipment. Include information on scheduling and describe how the maintenance timetable is followed and adjusted. ([Click here to return](#))
- 6. Tracking of Hazard Correction**
- How does the company track hazards until completion? Does the tracking system assign responsibility, time frames for corrections, interim protection, provide feedback to employees that have reported the hazard? Does the system result in timely correction of hazards? ([Click here to return](#))
- 7. Disciplinary System**
- Describe any positive reinforcement system you may use(safety awards, or recognition).
 - Provide detailed description including peer-to-peer safety observations, incentives for participation in safety activities, etc.

- Describe or attach a copy of the company's safety and health rules, describing the written disciplinary system. Does it include procedures for disciplinary action of managers, supervisors, and non-supervisory employees who violate health and safety policies, rules, work practices, material handling or emergency procedures? Is it enforced equally? Does it discourage employees from reporting? ([Click here to return](#))

8. Emergency Preparedness

- Describe the company's emergency planning and preparedness program. Include information on emergency and annual evacuation drills. How many were completed and what types.
- Describe how credible scenarios are chosen for emergency drills and their relationship to the worksites-specific hazards.
- Describe the review process of the drills/exercises. ([Click here to return](#))

Safety and Health Training

1. Formal and Informal Training

- Describe formal and informal safety and health training programs for employees, supervisors, and managers.
- Is training classroom, hands on, and/or computer based?
- Specifically address how employees are taught to recognize hazards related to their jobs? ([Click here to return](#))

2. Training Courses

- Describe how often and in what way courses are evaluated and updated? ([Click here to return](#))

3. Testing

- Describe testing in use to ensure that employees understand and retain course information and the effectiveness of the training. Examples include tests and work observations. ([Click here to return](#))

4. Training Records

- Describe how and where training records are kept. ([Click here to return](#))

5. Training Frequency

- Describe how frequently training is performed and what prompts repeat training. ([Click here to return](#))

6. Key Subcontractor Training

- Describe the safety and health orientation provided for key subcontractor(s). ([Click here to return](#))

7. Hazard Condition Training

- Describe how employees are trained in Hazard Recognition

8. Emergency Evacuation Training

- Explain how company managers, supervisors, and non-supervisory employees become familiar with emergency evacuation procedures and their specific responsibilities, when applicable.

ATTACHMENT E:

Virginia BUILT SHMS Self-Assessment Form

Virginia BUILT ABC-VA/VOSH Partnership SHMS Self-Assessment Form Instructions

This form is to be completed by Virginia BUILT Partnership applicants.

Included in this workbook are:

Tab 1. Overview

Tab 2. BUILT SHMS Self-Assessment Form

Tab 3. Documentation Check List

Tab 4. Participant Status Summary

To access these worksheets, please click on the tab at the bottom of this form.

1. Complete the Partner information required at the top of the SHMS Self Audit Form.
2. For each element on the Self-Assessment Form, assess which of the 3 desired outcomes has been completed in your organization. (Listed under Evaluation Code labeled "1", "2", "3")
3. Based on your assessment choose the equivalent Evaluation Code from the drop down box for each element.
4. The Summary worksheet will automatically populate.





Partner Name
Virginia BUILT

SHMS Elements	Total Score	% of Maximum
Management Leadership and Employee Involvement	0	0%
Worksite Analysis	0	0%
Hazard Prevention and Control	0	0%
Safety and Health Training	0	0%
Documentation		

Virginia BUILT Tiers are determined by the % of Maximum Score.

Mentorship Tier completion requires a score of at least 33% on all 4 SHMS Elements plus all of the Column 1 Documents

Tier I completion requires a score of at least 67% on all 4 SHMS Elements plus all of the Column 1 and Column 2 Documentation.

Tier II completion requires a score of 100% on all 4 SHMS Elements plus all of the Column 1, 2, and 3 Documents

Partner Name	Date

Management Leadership and Employee Involvement				
Element	Tier I	Tier II	Tier III	Evaluation Code
1. Management Commitment				
M1	Vision and Mission Statements	Develop issue and communicate safety and health vision statements.	Communicate vision and mission statements to all company and subcontractor employees; incorporate into new employee/subcontractor orientation	Take proactive steps to ensure the company and subcontractor employees understand the safety and health vision and mission statements.
			Include the vision and mission statement in bid packages.	Ensure policies become an integral part of routine activities and decision making during all phases of construction.
M2	Leadership	Establish a policy requiring company executives, managers, and supervisors to participate and demonstrate leadership in safety and health activities.	Continue participation by top executives and managers.	Continue to ensure total involvement in safety and health of all company and key subcontractor senior management, supervisors and lead persons.
			Require key subcontractors to adopt and begin implementing leadership policies and increase frequency of management participation in safety and health activities.	
M3	Resources	Develop safety and health budget, commit, and ensure utilization of adequate resources.	Provide additional resources for safety and health activities, including access to certified safety and health professionals, if necessary, and licensed health care professionals, and improve integration of safety and health into other planning activities.	Continue committing and ensuring the utilization of adequate resources by company and key subcontractors.
		Establish and implement a policy that integrates safety and health into the overall company management planning and budgeting process.		Ensure integration of safety and health in all company and key subcontractor planning and budget processes in the company.
M4	Targets and Objectives	Set and communicate annual safety and health targets and objectives based on findings from initial hazard and trend analyses, and safety and health perception survey results.	Review progress towards achievement of safety and health objectives; establish & communicate new objectives, as appropriate.	Company and subcontractors review, revise, and communicate safety and health targets and objectives.
			Require subcontractors to develop targets and objectives consistent with BUILT participation.	Ensure safety and health targets and objectives are routinely considered in companies and subcontractor's activities and programs.
M5	Communications	Establish clear lines of communication through all aspects of company operations	Maintain clear lines of communication with company and subcontractor employees involving safety and health issues.	Continue open dialogue between company and subcontractor management staff and employees.
		Provide reasonable access to senior management on safety and health issues.		
M6	Roles, Responsibilities, Authorities, and Accountability	Develop a safety and health accountability plan for managers/supervisors and non-supervisory employees.	Communicate and implement accountability plan.	Fully implement accountability system for all company and key subcontractor workers, including incorporating safety and health responsibilities into job descriptions and performance plans.

			Assign additional responsibilities to non-supervisory employees as appropriate.	Begin measuring performance of safety and health responsibilities in annual performance appraisal process.	
			Encourage subcontractors to adopt and begin implementing similar accountability plan or establish equivalent process.		
M7	Discipline	Establish a company disciplinary policy for all employees Re: Compliance with safety and health regulations, rules, procedures, etc.	Continue to implement disciplinary plan with an implementation schedule for managers and employees.	Ensure discipline is equally enforced for company and subcontractor employees.	
			Require key subcontractors, if applicable, to adopt company disciplinary policy or establish equivalent policies.		
M8	Annual Self-Evaluation	Develop and implement a written plan/ procedure for conducting annual self-evaluations.	Develop a written plan/ procedure for conducting annual self-evaluations and other evaluations, including requirement for narrative reports.	Company and key subcontractors implement systems and written procedures to annually evaluate the safety and health management system.	
			Encourage key subcontractors to adopt a similar policy or establish an equivalent process.	Company and key subcontractors complete at least one annual self evaluation of the safety and health management system.	
2. Employee Involvement					Evaluation Code
	Element	Tier I	Tier II	Tier III	
M9	Safety and Health Perception Survey	Conduct a safety and health perception survey for employees and key subcontractor employees, if applicable	Review and respond to survey findings and conclusions.	Conduct follow-up safety and health perception survey to identify further needed improvements.	
M10	Safety and Health Perception Survey Change Plan	Develop an action plan to address findings from the safety and health perception survey.	Implement steps defined in the company's action plan to improve safety and health culture.	Continue implementing action plan.	
			Require key subcontractors to develop action plan to address findings related to them.		
M11	Employee Notification	Notify all employees and subcontractor employees of their safety and health rights under the OSH Act and inform them of the company's participation in BUILT.	Notify new employees of their safety and health rights and the company's participation in BUILT.	Inform all employees annually of worker rights and include elements in company/ project site orientation for new employees and subcontractors.	
		Encourage the reporting of hazardous conditions.	Incorporate into new employee/ subcontractor orientation.	Reinforce as appropriate.	
M12	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 safety and health activities (e.g. safety audits).	Increase participation on teams, and/ or form additional teams.	All teams are functioning and meaningfully contributing to safety and health.	
			Involve employees in safety and health activities (e.g. incident/ near-hit incident investigations).	Ensure teams are routinely conducting audits, incident investigations, self-inspections, and job hazard analyses.	
			Require key subcontractors to adopt and begin implementing company policy, participate in company activities, or equivalent processes.	Utilize team input to improve and continue the company's hazard reporting system.	
				Encourage more active and open key subcontractor participation.	

3. Contract Worker Coverage					Evaluation Code
Element	Tier I	Tier II	Tier III		
M13	Equal Safety and Health Protection	Develop and begin implementing a plan for how subcontractors will provide their employees with equal safety and health protection.	Work with subcontractors to improve and continue implementing subcontractor program.	Work with subcontractor to improve and continue implementing subcontractor program.	
M14	Adherence to Rules	Require subcontractors and their employees to comply with VOSH and company safety and health rules. Inform all subcontractor employees of this requirement before work begins.	Develop as system to handle safety and health violations of subcontractor employees working on-site.	Improve and continue to enforce company policy for safety and health violations.	
M15	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 key subcontractors' work areas including assignment of responsibility.	Ensure key subcontractors effectively implement systems to identify and correct hazards in their work areas and include responsibility for hazard correction in writing.	
M16	Subcontractor Selection	Require in bid documents to include subcontractor injury and illness records for past three years (if available), and copies of their written safety and health program.	Implement policy and process for addressing safety and health performance of potential bidders.	Continue to encourage and reinforce the importance for key subcontractors to develop and implement good effective safety and health management systems.	
		Consider the above information when selecting subcontractors for work.			
M17	Removal Policy	No Action Required.	Establish and communicate a formal policy on subcontractor safety and health violations, including removal and possible financial penalties.	Hold subcontractors responsible for correcting hazards created by their work and ensure any penalty policies are understood by all subcontractors and their contractors described in their contract.	
			Include policy in the company contract requirements.		

Worksite Analysis					Evaluation Code
Element	Tier I	Tier II	Tier III		
W1	Initial Safety and Health Hazard Analysis	Conduct a safety and health initial analysis including a review of previous incidents, injuries, and illnesses; complaints; previous studies; etc.	Require key subcontractors to perform initial analysis as necessary in accordance with VOSH and company requirements and share pertinent information with general contractor, or other subcontractors.	Repeat initial surveys, if warranted, by significant changes in tasks, equipment, or processes.	
W2	Hazard Analysis of Routine Jobs, Tasks, and Processes	Review routine tasks to ensure compliance with local, state and federal safety and health regulations.	Conduct hazard analysis for work and recommended 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.	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 BUILT participant to warrant hazard analysis.	

			Update the company hazard analysis, as appropriate.		
		Begin to formalize system to ensure employees are properly trained on routine jobs, tasks, and processes.	Require Key subcontractors to perform initial analysis as necessary in accordance with VOSH and company requirements and share pertinent information with general contractor, or other subcontractors.	Ensure key subcontractors continue implementing similar processes.	
W3	Hazard Analysis of Significant Changes	Establish and begin implementing systems for identification and documentation of safety and health hazards of significant changes, new processes, and changes in design/ engineering plans.	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 VOSH regulations.	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.	
		Require key subcontractors, if applicable, to adopt and begin implementing similar systems.	Subcontractors implement a policy and begin identifying and documenting hazards of significant changes.		
W4	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.	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.	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.	
		Require key subcontractors to develop and implement similar systems.	Key subcontractors begin performing pre-task analysis of work they are contracted to perform.		
W5	Health Studies	No Action Required.	Establish, document, & implement future sampling schedule, strategy and rationale.	Continue implementing health studies as needed and take proactive steps to improve control of health hazards to prevent occupational disease.	
			Follow-up on results of necessary health studies.		
			Conduct more in-depth analysis if warranted to determine actual employee exposure.		
			Require subcontractors to participate in the company health studies when required.		
			Follow-up on results of subcontractor initial health study, if applicable, and conduct more in-depth analysis, if warranted.		
W6	Routine Self-Inspections	Establish routine self-inspection program that ensures safety and health inspections are performed as often as necessary.	Develop a system for scheduling routing self-inspections of the workplace; conduct inspections with safety and health staff. The entire site must be self-inspected as often as necessary, but never less than weekly.	Conduct routine self-inspections covering entire worksite as often as necessary, but at least weekly.	
		Train company employees in the recognition and avoidance of hazards in their work area.	Require key subcontractors to adopt similar policies.	Ensure key subcontractors processes implement similar self-inspection processes.	

W7	Hazard Reporting Systems for Employees	Use data collected from incident reports and other sources to determine areas to contrate on.	Develop and begin implementing hazard-reporting system for employees, requiring timely responses back to employees reporting anonymous when possible.	Continue implementing hazard reporting systems and encouraging more active reporting by both company and key subcontractor employees; ensure timely investigations of hazard reported, ensure regular feedback, using different media, to all employees on status of hazards reported.	
		Obtain supervisor and employee input for suggested plan of action in developing a hazard reporting system.	Require key subcontractors to participate in the company process or establish equivalent processes.		
W8	Investigation of Incidents and Near-Hit Incidents	Develop and implement requirements to report and investigate incidents.	Company and key subcontractors expand investigation activities to include near-hit incidents and make finding available to employees.	Continue reporting and investigating incidents and near-hit incidents.	
		Investigate incidents and prepare and maintain written reports of investigations.			
		Involve employees in the investigations.			
		Require key subcontractors, if applicable, to adopt and begin implementing similar systems.			
W9	Trend Analysis	Conduct initial trend analysis or 3 previous years' injury and illness rates and begin developing a plan for conducting analysis of other safety and health related information.	Conduct trend analysis of other safety and health information not yet studied; conduct one of injury illness history if a year has gone by since initial analysis.	At least annually conduct a trend analysis of company and key subcontractors safety and health information and use reults in setting future targets to address trends.	
			Require key subcontractors to develop and implement similar systems.		

Hazard Prevention & Control					Evaluation Code
Element	Tier I	Tier II	Tier III		
H1	Certified Professional Resources	Ensure outside sources are available if needed to conduct initial hazard analysis.	Ensure adequate resources (e.g. access to certified S&H professionals, licensed health care professionals).	Continue to provide necessary resources (e.g. Certified Safety Professionals, Certified Industrial Hygienists).	
			Key subcontractors ensure adequate resources.		
H2	Hazard Elimination & Control Methods	Establish systems to prioritize and implement controls for identified hazards, through the initial safety and health study, trend analysis of OSHA logs, and incident investigations.	Develop an action plan to prioritize and implement controls for hazards identified through self-inspections, employee reports of hazards, and near-hit investigations.	Complete long term abatement projects from Tier II.	
			Identify options and select most appropriate option or combination for hazard elimination and control.		
		Require key subcontractors to adopt company hazard elimination and control system or implement equivalent.	Implement hazard controls (or interim protection) for top priority hazards before moving onto Tier III.	Continue to identify, prioritize, and implement control for hazards identified through all means (hazard analysis, trend analysis, incident and near-incident investigations, self-inspections, employee reports, of hazards, pre-use analysis, etc.) so that there is a continuous loop of hazard identification and control.	
			Key subcontractors implement equivalent systems for hazard elimination and control methods.		

H3	Hazard Control Programs	Inventory existing hazard control programs required by VOSH regulations. Develop missing programs or modify if necessary.	Continue to implement hazard control programs developed or modified in Tier I and train all workers on these programs.	Continue to maintain hazard control programs required by VOSH regulations, and other rules and regulations.	
		Develop appropriate company safety and health rules, standards, manuals, etc.	Subcontractors implement effective hazard control programs, standards, rules, etc.	Review hazard control programs annually and update them as new processes, jobs, and tasks are begun.	
		Require subcontractors, if applicable, to develop and implement similar effective programs.			
H4	Tracking of Hazard Corrections	Develop and begin implementing a hazard tracking system for hazards identified through the initial hazard analysis, trend analysis of OSHA logs, and incident investigations.	Continue implementing and improving tracking system.	Company and subcontractor tracking systems are fully functioning and include hazard identified through all methods.	
		Require subcontractors to adopt and implement a company tracking system or establish equivalent.	Subcontractors implement systems to track hazard identified in initial hazard analysis, trend analysis, and self-inspections.	Communicate with workers throughout the process on the status of hazards until they are abated.	
H5	Preventative Maintenance of Equipment	Conduct an inventory of equipment and machinery requiring preventative maintenance (PM).	Review equipment inventory. Establish and implement a preventative maintenance schedule.	Continue to perform preventative maintenance as scheduled.	
		Require subcontractors, if applicable to develop a similar PM program.	Subcontractors implement preventative maintenance program to ensure the safe upkeep of equipment operating the project site.	Schedule is routinely observed and preventative maintenance is regularly conducted. Subcontractors have preventative maintenance inventory and schedule and it is being conducted.	
H6	Occupational Health Care Program	Conduct thorough review of injury/illness records.	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 outcome of the initial S&H analysis.	Continue providing services listed in Tier I and Tier II.	
		Compare with insurance claims loss runs to ensure records are in order.	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.	Consider seeking health care providers to visit the site/ project, and assist in identifying causes and symptoms of injury/ illness.	
		Utilize licensed health care professionals if needed.		Care provided is within the scope of contracts, licensure, and standard operating procedures.	
		Require subcontractors to provide access to health care services based on initial safety and health analysis, including physician and emergency medical care.			
H7	Emergency Preparedness and Response	Establish and communicate to company and subcontractor employees written procedures for addressing responses when responding to all types of emergencies.	Continue communicating emergency procedures and providing emergency medical services.	Continue to improve written emergency procedures for responding to emergencies on all shifts.	
		Conduct at least one evacuation drill or one critique of emergency response procedures to assess their effectiveness annually.	Establish emergency response procedures and providing emergency medical services.	Continue to review established emergency procedures annually.	

		Make emergency services available on all shifts such as emergency transportation, EMT's, emergency clinics, or hospital emergency rooms.	Conduct at least one drill with company and subcontractor employees and assess its effectiveness and follow-up on recommendations to improve emergency evacuation drills.	Establish one operational emergency response team for each shift.	
		Ensure at least one employee is trained in first aid & CPR for each shift.		Ensure full implementation of site's emergency preparedness and response plan.	
		Require subcontractors to adopt the company emergency procedures or equivalent.			

Safety and Health Training					Evaluation Code
Element	Tier I	Tier II	Tier III		
S1	General Guidelines	Observe BUILT Guidelines in providing training for required programs.	Continue observing BUILT guidelines in providing training.	Continue observing BUILT guidelines in providing training.	
S2	Training For All Workers	Provide training to all workers on their safety and health rights, BUILT principles, hazards in the workplace, PPE, emergency evacuation procedures, and individual emergency responsibilities.	Continue providing training to all workers, including new workers, on their safety and health rights, BUILT fundamental principles, hazards in the workplace, PPE, emergency evacuation procedures, and individual emergency responsibilities.	Contiguously improve safety and health training to workers.	
		Ensure training is recorded.			
		Maintain a record of training conducted.	Ensure subcontractors are fulfilling their obligations to train their employees to recognize hazards in the workplace.		
S3	Training for Specific Groups of Workers	Provide specific training to managers and supervisors, to designated safety and health staff and others with safety and health responsibilities, and provide them with knowledge and skills needed to perform their safety and health responsibilities. (i.e., hazard recognition, incident investigation and root cause analysis, hazard controls, VOSH regulations and BUILT requirements).	Expand specific training to all selected employees, managers and supervisors, and designated safety and health staff.	Take proactive steps to provide specific training to their employees and share the knowledge & skills and lessons learned.	
			Subcontractors provide specialized training to their employees on how to perform their assigned and contracted work and control/ eliminate its hazards.		

2. Employee Involvement					Evaluation Code
Element	Tier I	Tier II	Tier III		
D1	Minimum Required Documentation	Vision and Mission Statements			
D2		Annual Safety and Health Targets and Objectives			
D3		Accountability Plan			
D4		Budget documents showing allocated resources for Safety and Health			
D5		Disciplinary Plan			
D6		Contract Selection Requirements			
D7		Accurate and up to date records of injury and illness for the previous 3 calendar years (OSHA 300 Logs)			
D8		Insurance Claim Forms			
D9		Incident Reports			
D10			Any Follow up on Written Health Study Program's Necessary Testing Results	Documentation of the Continued Testing and Sampling as Required by the Jobsite.	
D11		Written Hazard Control Programs			
D12		Incident Investigation Forms and Reports			
D13		Written Subcontractor Policies	Subcontractor Program Documentation- Safety and Health Program, Inspection Reports, Correction Tracking Reports, Incident Reports.		
D14		Safety and Health Perception Survey Form		Follow up Safety and Health Perception Survey and Results	
D15		Results of Safety and Health Perception Survey and Plan for Addressing Changes.			
D16		Trend Analysis Results	Trend Analysis Procedures and Reports		
D17		Incident Investigation Procedures.			

D18		Hazard Correction Action Plan			
D19		Hazard Correction Tracking System			
D20		Preventative Maintenance Inventory	Written PM Schedule and Systems		
D21		Written Emergency Procedures	Emergency Procedures- Additional Updates		
D22		Training Records	Training Matrix and Records.		
D23			Job Hazard Analysis Forms and Records.		
D24			Routine Self-Inspection Forms and Records		
D25			Employee Hazard Reporting Form		
D26			Minutes, Charters, Mission Statements of Safety and Health Teams		
D27			Documentation Showing Implementation of Hazard Controls and their Effectiveness (i.e. ventilation studies, PPE purchases, machine guarding purchases)		
D28			Annual Evaluation Procedures	Annual Self Evaluation of the Company's Safety and Health Management System	
D29			Policy on Subcontractor Removal		
D30				Hazard Analysis Showing Analysis of Non-Routine Tasks or Significant Changes	
D31				Pre-Use Analysis Forms and Results	

ATTACHMENT F:

Tier One Guidance: The employer has developed and implemented an effective safety and health management system that meets current VOSH regulatory requirements.

Virginia BUILT Tier One Guidance

Management Leadership and Employee⁴ Involvement

Begin demonstrating visible, serious, and committed safety and health leadership by publicly accepting ultimate responsibility for safety and health in the total company and taking other appropriate actions to begin developing a culture, creating systems, and establishing policies and procedures that support safe and healthy work environments on all work sites.

Management Commitment

Actions to Achieve Desired Outcomes

1. **Safety and Health Vision Statement.** Develop, issue, and communicate a Safety and Health Vision Statement (*i.e.*, defining where the company wants to be). This Vision statement should address the company's desire to participate in Virginia BUILT and ultimately, to achieve Virginia BUILT performance and approval. This process may include involving permanent employees in the development of these documents.
2. **Safety and Health Mission Statement.** Develop, issue, and communicate a Safety and Health Mission Statement (*i.e.*, what the company commits to doing).
3. **Leadership.** Company establishes a policy requiring managers to participate and demonstrate leadership in safety and health program activities. Managers set an example and behaviors that demonstrate a commitment to safety and health, such as attending training, participating in planning meetings, wearing personal protective equipment, encouraging employees to report hazards, injuries and illnesses, enforcing the "if it's not safe, we're not doing it" principle, and performing other safety and health-related actions that are required of employees.
4. **Adequate resources and safety and health integration.** Company commits adequate resources for all safety and health requirements, including a plan for covering typical safety and health expenditures, as well as unusual, high risk, or emergency expenditures such as requirements for prompt correction of uncontrolled hazards (*i.e.*, uncontrolled hazards include those that cannot be immediately corrected, such as industrial hygiene, ergonomic, etc., issues). Commit and ensure utilization of adequate resources to achieve at least the minimum outcomes specified for this Virginia BUILT Tier. Take management action to begin integrating safety and health into other aspects of planning, such as planning for new equipment, processes, building materials, etc. Company establishes a policy/requirement that safety and health will be integrated into the overall planning and budgeting processes.
5. **Safety and health targets and objectives.** Establish, document, and communicate to employees the annual safety and health targets and objectives that are clear, attainable, measurable, and relevant to bringing about a safe and healthy work environment, as well as the policies and procedures that will help achieve these targets and objectives. Targets should be based on outcome of an initial survey and a trend analysis. Establish a policy/requirement that key subcontractors will develop their targets and objectives supportive of the company targets in an equivalent manner.
6. **Clear lines of communication with employees and employee access.** Take action to establish clear lines of communication with employees and ensure that they have reasonable access to senior management with regard to safety and health issues. Address issues of worker language barriers by providing safety and health information in languages spoken and understood by workers.

4 The term "employee" is used in this document to refer to all types of employees, including managers, supervisors, and non-supervisory employees, whether full-time, part-time, permanent, or temporary.

7. **Clear responsibilities, authority, and accountability for safety and health.** Clarify the safety and health responsibilities of each company employee.
 - a. Identify who will be responsible for achieving safety and health targets and objectives.
 - b. Identify specific persons to be accountable for meeting safety and health targets, including, at a minimum, managers, supervisors, and specific safety and health staff; assign adequate authority, as appropriate to their level of responsibility; and explain their accountability and authority to all employees.
 - c. Develop a safety and health accountability plan to hold managers, supervisors, and non-supervisory employees accountable for meeting their responsibilities through a documented performance standards and appraisal system.
 - d. Establish a policy/requirement that key subcontractors will adopt the company process for accountability plans and defining responsibilities or establish equivalent processes.
8. **Disciplinary plan.** Establish a company policy/requirement for all employees that disciplinary action will be taken against any employee that does not comply with company rules, regulations, etc.
9. **Annual Self-evaluation.** No action required at this Tier for evaluation of the company's safety and health management system.

Employee Involvement

Actions to Achieve Desired Outcomes

1. **Safety and Health Perception Survey.** Company evaluates the current safety and health perceptions and practices and establishes a baseline in the following areas for each of the following categories of personnel – managers, supervisors, non-supervisory employees.
 - a. Levels of involvement in the safety and health program.
 - b. Values regarding the importance of worker safety and health.
 - c. Perceptions of the effectiveness of the total company's safety and health management system.
 - d. Perceptions of how well the culture encourages and supports reporting on hazards, incidents, and injuries.
 - e. Compliance with safety and health requirements.
 - f. Perceptions regarding their roles, responsibilities, and accountability in ensuring safety and health wherever they are working.
2. **Safety and Health Perception Survey Action Plan.** Develop an action plan to address the findings from the survey and begin implementation of the plan.
3. **Employee notification.** Notify company and subcontractor employees as follows:
 - a. Inform managers, supervisors, non-supervisory employees of their rights and responsibilities under the Occupational Safety and Health Act. Take steps to encourage them to freely exercise their rights and responsibilities, especially that of freely reporting hazards in the workplace.
 - b. Inform current employees and new hires as part of new employee orientation, of the company's participation in Virginia BUILT and of the fundamental principles of Virginia BUILT.
4. **Employee involvement.** Develop a plan, including an implementation schedule, for how to bring about the meaningful involvement of all managers, supervisors, and non-supervisory employees through participation in various safety and health related activities. Specifically, for this Virginia BUILT Tier:

- a. Establishment of teams (*e.g.*, a safety and health planning team, Virginia BUILT Team, etc.) representing different sectors of the company’s staff, to bring about meaningful change.
- b. Begin to involve some employees in safety and health activities such as incident investigations. Note: ensure that proper training is provided before employees conduct such activities.
- c. Establish a policy/requirement that key subcontractors will adopt the company processes for employee involvement, participate in company activities, or establish equivalent processes.

Subcontractor Worker Coverage

Actions to Achieve Desired Outcomes

1. **Subcontractor oversight and management system.** Develop, document, and begin implementing the following basic elements of an oversight and management system covering subcontractors:
 - a. **Equal safety and health protection.** Develop and begin implementing a plan for how subcontractors will provide their employees with safety and health protection equal in quality to that provided to company employees.
 - b. **Adherence to safety and health rules.** Inform all subcontractors and their employees that they are required to adhere to all of the company’s safety and health rules, regardless of their status or the length of time they perform work on the site/project.
 - c. **Hazards in subcontractor work areas.** Establish a requirement that subcontractors provide timely identification, correction, and tracking of uncontrolled hazards in their work areas (*i.e.*, uncontrolled hazards include those that cannot be immediately corrected, such as industrial hygiene, ergonomic, etc., issues).
2. **Subcontractor Selection Criteria.** Establish and begin implementing a policy/requirement defining the company’s subcontractor selection criteria that includes as a minimum, review of the previous three years of injury and illness records, and review of written safety and health management program
3. **Removal policy** – No action required at this Tier.

Worksite Analysis

Begin to develop a system for identifying basic and unforeseen safety and health hazards, evaluating their risks, prioritizing them, and recommending methods to eliminate or control hazards to an acceptable level of risk.

Initial Safety and Industrial Hygiene Hazard Analysis

Actions to Achieve Desired Outcomes

1. Conduct an initial safety and industrial hygiene hazard analysis to establish initial levels of company and key subcontractor employee exposure for comparison to future levels, so that changes can be recognized. This study should include a review of previous incidents, injuries, and illnesses; complaints of workplace hazards; previous studies, etc.
2. Ensure that the initial survey accomplishes the following:
 - a. Identifies and documents common safety hazards on the project/site and how they are controlled.
 - b. Identifies and documents common health hazards on the project/site and determine if further sampling is required.

- c. Identifies and documents safety and health hazards that need further study.
 - d. Ensures that initial surveys adequately cover the entire work site and indicates who conducted the survey, and when it was completed.
3. Repeat the initial survey only if warranted by significant changes (*e.g.*, changes in processes, equipment, and hazard controls).

Hazard Analysis of Routine Jobs, Tasks, and Processes

Actions to Achieve Desired Results

1. Review and ensure that programs developed and/or implemented are in compliance with local, state, and Federal safety and health regulations based on routine tasks performed.
2. Begin to formalize a system to ensure employees are properly trained in the procedures implemented.

Hazard Analysis of Significant Change

Actions to Achieve Desired Results

1. Company has established and has begun implementing a policy/requirement to identify and document safety and health hazards of significant changes, new processes, and significant changes in design or engineering plans, materials, equipment and facilities to identify uncontrolled hazards prior to the activity or use and recommend adequate hazard controls.
2. Establish a policy/requirement that key subcontractors will adopt the company process for hazard analysis of significant changes, participate in company hazard analysis activities, or establish equivalent processes.

Pre-use Analysis

Actions to Achieve Desired Results

1. If the company is considering new equipment, chemicals, facilities, or significantly different operations or procedures, conduct a pre-use analysis to review the potential safety and health impact on the workers.
2. Develop and begin implementing a plan for how to integrate this practice into the procurement/design phase to maximize the opportunity for proactive hazard control.
3. Take proactive steps to ensure pre-use analysis continues to be integrated into the procurement/design phases.
4. Establish a policy/requirement that key subcontractors adopt the company process for pre-use analysis, participate in company activities, or establish equivalent processes.

Industrial Hygiene (IH) Program

Actions to Achieve Desired Outcomes

1. No action required at this Tier.

Routine Self-Inspections

Actions to Achieve Desired Outcomes

1. Establish a routine self-inspection program and perform safety and health inspections on a regular basis.

2. Train company employees in the recognition and avoidance of hazards in their work environment and begin having them routinely inspect their work areas, materials, and equipment on a regular basis.

Incident Investigations

Actions to Achieve Desired Outcomes

1. Company establishes a documented policy/requirement on reporting and investigating incidents.
2. Company investigates incidents and maintains written reports of the investigations. Investigations should follow the following guidelines:
 - a. Identify all contributing factors.
 - b. Document the entire sequence of relevant events.
 - c. Recommend actions to prevent recurrence.
 - d. Assign timeframes and responsibility for implementing recommended controls.
3. Establish a policy/requirement that key subcontractors adopt the company process for incident investigation, or establish equivalent processes.

Hazard Reporting System for Employees

Actions to Achieve Desired Outcomes

1. Use data collected on incident reports (e.g., Employers First Report of Injury), insurance loss runs, etc. to determine the areas that should be concentrated on.
2. Share information and seek supervisor and employee input for a suggested plan of action for developing a hazard reporting system, using model programs (e.g., from insurance carriers, peer groups, Virginia BUILT Coordinator) for guidance.

Trend Analysis

Actions to Achieve Desired Outcomes

1. Conduct an initial trend analysis of previous three complete calendar years' injury and illness history, based on a thorough review of OSHA 300 logs, workers compensation claim forms, and incident reports.
2. Begin developing a plan for conducting an analysis of other safety and health-related information (e.g., hazards identified during inspections, employee reports of hazards, incidents, near-hit incidents, etc.) for the purpose of establishing or detecting trends, planning, and setting targets.

Hazard Prevention and Control

Begin to develop systems to prevent and control hazards on all worksites.

Certified Professional Resources

Actions to Achieve Desired Outcomes

1. Ensure that outside sources are available if needed to conduct an initial hazard analysis, and that they are qualified to perform the survey pertinent to the work activity involved.

Hazard Elimination and Control Methods

Actions to Achieve Desired Outcomes

1. Company establishes and implements a system that prioritizes hazards identified in this Tier based on the potential seriousness of injury, illness, property loss, frequency of exposure, and long-term effects so that the highest hazard items are addressed first. Establish an action plan for correction.
2. Identify options and select the most appropriate option or combination of options for hazard elimination and control methods, including engineering controls, administrative controls, work practices, and personal protective equipment (PPE).
3. Take steps to ensure that the selected controls are appropriate to the project/site's hazard(s); understood and followed by all affected parties; equitably enforced through the disciplinary system; written, implemented, and updated as needed; used by employees; and incorporated into training, positive reinforcement, and correction programs.
4. Require key subcontractors to adopt company hazard elimination and control system or implement an equivalent system.

Hazard Control Programs

Actions to Achieve Desired Outcomes

1. Conduct an inventory of existing hazard control programs required by VOSH standards (*e.g.*, PPE, Hazard Communication, Respiratory Protection, Lockout/Tagout, Confined Space Entry, Process Safety Management, or Bloodborne Pathogens).
2. Review existing programs to identify what is missing or unsatisfactory.
3. Develop missing programs and modify existing programs, as needed, to meet all VOSH guidelines, including training requirements.
4. Develop and distribute to employees appropriate company safety and health rules, requirements, procedures, manuals, etc., necessary to define and communicate company hazard control programs.
5. Require key subcontractors to adopt and implement company hazard control programs or establish equivalent programs.

Occupational Health Care Program

Actions to Achieve Desired Outcomes

1. **Records Review:** Conduct a thorough review of injury/illness records (see above) and ensure they are in order.
2. **Licensed health care professionals.** Provide resources to utilize certified safety professionals (CSP), or certified industrial hygienist (CIH) and licensed health care professionals if needed based on the safety and health analysis. Provide emergency services as listed above.
3. **Subcontractor Health Care.** Require subcontractors to provide access to health care services, as required, based on results of the initial safety and health analysis including physician and emergency medical care.

Preventive Maintenance of Equipment

Actions to Achieve Desired Outcomes

1. Company will perform preventive maintenance as required by manufacturer.
2. Require subcontractors to perform preventive maintenance as required by manufacturer.

Tracking of Hazard Correction

Actions to Achieve Desired Outcomes

1. Develop and begin using a documented system to record hazards identified in this Tier through the initial study, trend analysis, and incident investigations. The system must document priority, assign responsibility for correction, establish timeframes for correction, and follow up to ensure total abatement.
2. Require key subcontractors to adopt and implement the company tracking system or establish an equivalent system.

Emergency Preparedness and Response

Actions to Achieve Desired Outcomes

1. Establish and communicate company written procedures to company and subcontractor employees for responding during all shifts to all types of emergencies (fire, chemical spill, incident, terrorist threat, natural disaster, etc.).
2. Dependent upon project size and/or complexity, conduct at least one evacuation drill and assess how well the procedures worked.
3. Make available and explain to all employees emergency procedures and services, including provisions for physician care and emergency medical care, ambulances, emergency medical technicians, emergency clinics, or hospital emergency rooms, available for all shifts within a reasonable time and distance.
4. Ensure that there is at least one trained employee for each shift trained in first aid and CPR.
5. Require subcontractors to adopt the company emergency procedures or equivalent procedures, and participate in company emergency drills and activities listed above.

Safety and Health Training

Begin to provide training to safety and health and other staff to help them acquire the knowledge and skills they need to perform their safety and health responsibilities on all worksites.

Actions to Achieve Desired Outcomes

1. Provide training to company managers, supervisors, and non-supervisory employees following the general guidelines below:
 - a. Ensure VOSH required training is performed, documented and up-to-date.
 - b. Document attendance.
 - c. Ensure that training is conducted by persons who have specific subject matter knowledge or expertise.

- d. Use findings of the various worksite analysis activities (*e.g.*, initial study, hazard analysis of routine jobs, tasks, and processes, etc.) to develop training that is relevant to the company.
2. At a minimum, provide the following types of training to current or new managers, supervisors, and non-supervisory employees:
 - a. Their rights and responsibilities under the VOSH laws, standards and regulations.
 - b. Virginia BUILT fundamentals.
 - c. Hazards in the workplace; how to recognize hazardous conditions; signs and symptoms of workplace-related illnesses; protective measures; safe work procedures.
 - d. What is required personal protective equipment (PPE), why it is required, its limitations, how to use and maintain it.
 - e. Specific responsibilities for each type of emergency.
 - f. Emergency procedures as required.
3. At a minimum, provide the following types of training to managers and supervisors:
 - a. Specific safety and health responsibilities and how to carry them out effectively.
 - b. Methods for changing workplace safety and health attitudes and practices.
 - c. Virginia BUILT fundamental principles.
 - d. Requirements for Virginia BUILT Tier One.
4. At a minimum, provide an orientation program for subcontractor employees:
 - a. Their rights and responsibilities under VOSH laws, standards, and regulations.
 - b. Virginia BUILT fundamental principles.
 - c. Hazards in the workplace.
 - d. Personal protective equipment (PPE) required on the job.
 - e. Specific responsibilities for each type of emergency.
 - f. Emergency procedures.

ATTACHMENT G:

Tier Two Guidance:

The employer has an established safety and health management system that exceeds current VOSH regulatory requirements.

Virginia BUILT Tier Two Guidance

Management Leadership and Employee⁵ Involvement

Continue demonstrating serious and committed safety and health leadership by taking additional steps to improve the culture, systems, policies, and procedures that support a safe and healthy work environment.

Management Commitment

Actions to Achieve Desired Outcomes

1. **Safety and Health Vision and Mission Statements.** Continue to communicate the company's Safety and Health Vision and Mission Statements to company and subcontractor employees. Incorporate appropriate information about the Safety and Health Vision and Mission Statement into the company's orientation training for new employees and subcontractors. Include the company's safety and health vision and mission statement in contract bid documents.
2. **Leadership.** Company managers continue setting an example through behaviors that demonstrate total commitment to safety and health. Ensure increased participation by top executives and managers in safety and health related activities, including examples of activities established in Tier One. Require key subcontractors to begin implementing a policy/requirement on leadership and participation or follow established policies and requirements of the key subcontractor.
3. **Adequate resources and safety and health integration.** Company continues committing and ensuring the utilization of adequate resources to support safety and health activities and programs including certified safety and health and licensed health care professionals. Improve the integration of safety and health into other planning and budgeting processes.
4. **Safety and health targets and objectives.** Review progress towards achievement of the company safety and health targets and objectives, as well as the policies and procedures to meet them; revise and communicate new annual targets and objectives, as appropriate. Require that key subcontractors develop targets and objectives that are consistent with and supportive of the Company's overall targets related to Virginia BUILT participation and Virginia BUILT performance. Key subcontractors begin implementing requirement.
5. **Clear lines of communication with employees and employee access.** Continue to take necessary action to clarify lines of communication with Company and subcontractor employees and ensure access to senior management regarding safety and health issues.
6. **Clear responsibilities, authority, and accountability for safety and health.** Continue clarifying safety and health expectations for each company and subcontractor employees.
 - a. Begin implementing the accountability plan for company managers, supervisors, and safety and health staff; incorporate performance, responsibilities and standards for safety and health, as well as the consequences for meeting or failing to meet expectations.
 - b. Communicate management expectations regarding everyone's safety and health responsibilities.
 - c. Support the authority of designated staff members who are accountable for safety and health targets.
 - d. Communicate which company personnel are responsible for achieving safety and health targets and objectives, with no unassigned areas, so that each employee and key subcontractor employee worker

⁵ The term "employee" is used in this document to refer to all types of employees, including managers, supervisors, and non-supervisory employees, whether full-time, part-time, permanent, or temporary.

understands his/her responsibility for safety and health (See item M6 on Virginia BUILT Self-Assessment Form).

- e. Monitor the performance of all company managers, supervisors, and specific safety and health staff members; giving them specific and timely feedback on performance; requiring corrective action plans if needed; conducting performance appraisals; providing commensurate rewards and recognition for good performance; and implementing consequences for poor performance.
 - f. Require that key subcontractors adopt and begin implementing the company accountability planning process or establish an equivalent process.
7. **Continue development and begin implementing disciplinary plan.** Continue to develop policy, procedures, and consequences with an implementation schedule. Ensure equitable enforcement among all non-supervisory employees, as well across levels (e.g., management staff should not get better treatment than non-supervisory employees). Demonstrate that employees will be held accountable for non-compliance with rules and requirements. Require that key subcontractors adopt and begin implementing the company procedure or establish equivalent processes.
8. **Annual self-evaluation of safety and health management system.** Develop a written company procedure defining how annual self-evaluations and other evaluations will be performed, including the requirement for written narrative reports. Require that key subcontractors adopt company procedures or establish an equivalent process.

Employee Involvement

Actions to Achieve Desired Outcomes

1. **Safety and Health Perceptions Survey.** Review and respond to the findings and conclusions of the Safety and Health Perceptions Survey conducted in Tier One.
2. **Safety and Health Perceptions Survey Change Plan.** Implement the company's Safety and Health Perception Survey Change Plan developed in Tier One. Require key subcontractors to develop an action plan that addresses findings related to them.
3. **Employee notification.** Notify new Company managers, supervisors, and non-supervisory employees of their rights and responsibilities under VOSH laws, standards and regulations; of the company's participation in Virginia BUILT; and of the fundamental principles of Virginia BUILT, and any other pertinent information. Incorporate this information into the company's orientation training for new employees and subcontractors.
4. **Employee involvement.** Implement the company employee involvement plan, developed in Tier One, such as:
 - a. The formation of new and/or greater participation in, safety and health teams to meet the company's needs at this Tier.
 - b. Increase employee participation as part of safety and health teams that conduct incident/near-hit investigations, self-inspections, and job hazard analyses.
 - c. Require key subcontractors to adopt and begin implementing the company employee involvement plan, participate in activities per contract and/or agreement, or establish equivalent plans.

Subcontractor Worker Coverage

Actions to Achieve Desired Outcomes

1. **Subcontractor oversight and management system.** Company improves and fully implements the following basic elements of an oversight and management system covering subcontractors:
 - a. **Equal safety and health protection.** Work with subcontractors to improve and continue implementing the key subcontractor program begun in Tier One to the point that provides protections equal to company programs.
 - b. **Adherence to safety and health rules.** Improve process for requiring subcontractor workers who work onsite, whether regular or temporary to adhere to all of the company's safety and health rules, regardless of their status or the length of time they perform work onsite. The process must include advising subcontractor workers that disciplinary action will be taken against employees that do not follow company rules and requirements.
 - c. **Hazards in subcontractor work areas.** Ensure subcontractors improve and formalize their own processes for the timely identification, correction, and tracking of uncontrolled hazards in their work areas and operations (*i.e.*, uncontrolled hazards include those that cannot be immediately corrected, such as industrial hygiene, ergonomic, etc., issues).
 - d. **Subcontractor selection and oversight.** Implement a policy and process for addressing safety and health performance of potential bidders including the review of written safety and health plan and injury and illness rates, in subcontractor selection and oversight.
 - e. **Removal of subcontractor for violations.** Company establishes and implements a penalty policy and process, for safety or health violations in subcontractor work areas including removal and/or financial penalties.

Worksite Analysis

Continue developing a system for identifying basic and unforeseen safety and health hazards, evaluating their risks, prioritizing them, and recommending methods to eliminate or control hazards to an acceptable level of risk.

Initial Safety and Industrial Hygiene (IH) Hazard Analysis

Actions to Achieve Desired Outcomes

1. Company requires as a contract requirement that key subcontractors must perform an initial safety and IH hazard analysis for the work they are contracted and assigned to perform. Key subcontractors begin performing the required initial safety and IH hazard analyses. (See IH Required Actions below).

Hazard Analysis of Routine Jobs, Tasks, and Processes

Actions to Achieve Desired Outcomes

1. Identify and document safety and health hazards of routine jobs, tasks, and processes and recommend hazard controls by conducting task-based or system/process hazard analyses when the routine jobs, tasks, and processes have had injuries/illnesses associated with them or have experienced significant incidents or near-hit incidents; are

perceived as high-hazard tasks, *i.e.*, which could result in a catastrophic explosion, electrocution, or chemical overexposure; or are required by a regulation or standard. Identify the steps of the task or procedure being analyzed, the hazard controls currently in place, recommendations for needed additional hazard controls, dates conducted, and the responsible parties.

2. Update the company hazard analysis as appropriate, such as when the environment, procedures, or equipment change or when hazards are found that invalidate the most recent hazard analysis.
3. Require key subcontractors to adopt and begin implementing the company's hazard analysis of routine system or establish equivalent plans. Key subcontractors begin performing effective hazard analysis of routine work.

Hazard Analysis of Significant Changes

Actions to Achieve Desired Outcomes

1. Company continues identifying and documenting potential safety and health hazards of significant changes, including but not limited to non-routine tasks (e.g., performed less than once per year), new processes, materials, equipment, and facilities to identify uncontrolled hazards prior to the activity or use and recommends adequate hazard control measures.
2. Key subcontractors implement policy and begin identifying and documenting safety and health hazards of significant changes in the work they are contracted to perform, including but not limited to non-routine tasks

Pre-Use Analysis

Actions to Achieve Desired Outcomes

1. If the Company is considering new equipment, chemicals, facilities, or significantly different operations or procedures, conduct a pre-use analysis to review the potential safety and health impacts on workers.
2. Key subcontractors begin to perform pre-use analysis for work they are contracted to perform.

Industrial Hygiene (IH) Program

Actions to Achieve Desired Outcomes

1. Following established Virginia BUILT guidelines; the Company develops a written Industrial Hygiene (IH) program to establish procedures and methods for identifying, analyzing, and controlling health hazards to prevent occupational disease. The written program must address sampling issues, including sampling methods, performed by whom, required documentation, and how information is communicated to workers.
2. Company begins implementing-the IH Program by doing the following:
 - a. Follow up on the results of the initial study conducted in Tier One.
 - b. Establish and implement sampling frequencies – a schedule for sampling identified hazards – and conduct additional sampling as needed, based on findings of the initial hazard analysis, review of chemicals, employee reports of hazards, previous exposures, and reports of illnesses.
 - c. Begin implementing appropriate controls for hazards identified in Tier One.

3. Company requires key subcontractors to adopt and implement the company IH program for the work they are contracted to perform or establish an equivalent program.
4. Key subcontractors establish and begin implementing IH program activities discussed above, follow up on initial IH study results, if appropriate, and perform more in-depth analyses to determine actual employee exposures.

Routine Self-inspections

Actions to Achieve Desired Outcomes

1. Company develops a documented system for routinely scheduled self-inspections of the workplace, including a tool or checklist, the inspection schedule, the members of the regular self-inspection teams to be created, recording of findings, responsibility for abatement, and tracking of identified hazards for timely correction.
2. Start self-inspections, at a minimum, by competent persons and cover worksites at least weekly.
3. Company requires subcontractors to adopt and implement the company routine inspection program or establish an equivalent program.
4. Subcontractors have adopted an equivalent documented routine self-inspection system program and begun performing routine inspections of the work activities and areas they were contracted to perform.

Hazard Reporting System for Employees

Actions to Achieve Desired Outcomes

1. Company develops and begins implementing a hazard-reporting system, which may be anonymous, that allows employees to use specific tools to inform management staff without fear of reprisal, about potential hazardous conditions, incidents, and near-hit incidents.
2. Determine and communicate to employees how they will receive feedback on actions taken regarding the hazards they report.
3. Company requires key subcontractors to adopt and implement the company employee hazard reporting system or establish an equivalent system.
4. Key subcontractors begin to implement an equivalent employee hazard reporting system for the work activities and area they are contracted to perform.

Investigation of Incidents and Near-Hit Incidents

Actions to Achieve Desired Outcomes

1. Company and key subcontractors continue investigating incidents, following the guidelines established in Tier One.
2. Company and key subcontractors expand their incident investigation procedures to include near-hit incidents and begin investigating near-hit incidents, following the same guidelines established in Tier One for investigating incidents.
3. Company and key subcontractors continue making findings and corrective actions available to employees on request (although actual investigation records need not be provided).

Trend Analysis

Actions to Achieve Desired Outcomes

1. Conduct a trend analysis of the other safety and health-related information not yet studied (*e.g.*, hazards identified during inspections, employee reports of hazards, incidents and near-hit incidents, etc.) for the purpose of establishing or detecting trends, planning, and setting targets.
2. Conduct another trend analysis of injury and illness history if a year has gone by since the initial trend analysis.
3. Company requires key subcontractors to adopt and implement the company systems for trend analysis or establish an equivalent system.

Hazard Prevention and Control

Continue implementing and improving systems to prevent and control hazards.

Certified Professional Resources

Actions to Achieve Desired Outcomes

1. Company ensures adequate resources such as certified safety and health professionals and other licensed health care professionals and other experts as needed, based on the risks at each site.
2. Key subcontractors ensures the availability to certified safety and health professionals and other licensed health care professionals as needed.

Hazard Elimination and Control Methods

Actions to Achieve Desired Outcomes

1. Company prioritizes hazards identified in this Tier based on seriousness and frequency of injury or illness or property loss, frequency of exposure, and long-term effects. Establish an action plan for correction.
2. Company identifies options and selects the most appropriate option or combination of options for hazard elimination and control methods, including engineering controls (including protective safety devices), administrative controls, work practices, and personal protective equipment.
3. Company has taken steps to ensure that the selected controls are appropriate to each site's hazards, understood and followed by all affected parties and equitably enforced through the disciplinary system. The company also ensures controls are written, implemented, updated as needed, used by employees, and incorporated into training programs for positive reinforcement and correction.
4. Key subcontractors adopt equivalent hazard control methods and have begun implementing the controls listed above in the work it has been contracted to perform.

Hazard Control Programs

Actions to Achieve Desired Outcomes

1. Company continues implementing hazard control programs required by VOSH standards. Modify and improve, as needed.

2. Company continues training all workers on these programs, as needed.
3. Company establishes necessary hazard control programs in compliance with new VOSH standards, if any.
4. Key subcontractors adopt and begin implementing equivalent hazard control programs in the work they are contracted to perform.

Tracking of Hazard Correction

Actions to Achieve Desired Outcomes

1. Continue implementing and improving the documented system established in Tier One to record hazards identified.
2. Record priority, responsibility for correction, time frames for correction, and follow-up to ensure total hazard abatement.
3. Key subcontractors have begun implementing a hazard correction tracking system for hazards identified in the initial hazards analyses, trend analysis, and self-inspection.

Preventive Maintenance of Equipment

Actions to Achieve Desired Outcomes

1. Company reviews the equipment inventory developed in Tier One.
2. Company establishes and begins following a preventive maintenance schedule to monitor and maintain equipment so that it can be replaced or repaired on a schedule according to manufacturers' recommendations.
3. Key subcontractors adopt equivalent preventive maintenance systems and begin implementation by inventorying equipment and material needing preventive maintenance.

Occupational Health Care Program

Actions to Achieve Desired Outcomes

1. **Licensed health care professionals.** Company provides employees' access to licensed health care professionals who can provide onsite or offsite services.
2. **Health services, as needed.** Company arranges for health services, such as pre-placement physicals, audiograms, and lung function tests for employees, as needed, based on the outcomes of the initial safety and health analysis.
3. Subcontractors determine how equivalent access to licensed health care, physician care, and emergency services will be provided for their employees working on each site.
4. Key subcontractors and company (per agreements) begin providing occupational health care for key subcontractor employees.
5. Information will be communicated to employees in writing and will be a part of the employee site orientation program.

Emergency Preparedness and Response

Actions to Achieve Desired Outcomes

1. Company and subcontractors continue communicating the emergency procedures in compliance with applicable Virginia BUILT criteria.
2. Company and key subcontractors improve emergency procedures and services, including provisions for emergency medical care, emergency transportation, emergency clinics, or hospital emergency rooms.
3. Company and key subcontractors establish an Emergency Response Team including persons trained in first aid and CPR available on all shifts (or an alternative that is at least as effective). Increase the number of trained individuals from Tier One.
4. Company and key subcontractors conduct at least one evacuation drill, assess how well the procedures worked, and improve the emergency procedures, as needed.

Safety and Health Training

Continue providing and improving training to all staff to help them acquire the knowledge and skills they need to better perform their safety and health responsibilities.

Actions to Achieve Desired Outcomes

1. Company and subcontractors continue to provide training to managers, supervisors, non-supervisory employees, and subcontractors following the general guidelines established in Tier One.
2. As needed, company and subcontractors continue to provide current or new managers, supervisors, non-supervisory employees, subcontractors, and designated safety and health staff all the required training established in Tier One.
3. In addition to required training established in Tier One, company and key subcontractors provide the following types of training to designated safety and health staff and others with assigned safety and health responsibilities to help them develop the knowledge and skills necessary to perform their assigned tasks. This include the following:
 - g. How to develop a disciplinary plan/program.
 - h. How to develop a system and written procedures to annually evaluate the company's safety and health management system.
 - i. How to conduct hazard analyses of significant changes.
 - j. How to conduct pre-use analysis.
 - k. How to conduct IH sampling, if applicable.
 - l. How to conduct an annual evaluation of the safety and health management system.
4. In addition to required training established in Tier One, subcontractors provide their workers with training on how to recognize hazardous conditions, signs and symptoms of workplace related illnesses, protective measures, and safe work procedures for the work they are contracted to perform.

ATTACHMENT H:

Tier Three Guidance

The employer has an exceptional safety and health management system that serves as a model for other construction employers in the Commonwealth.

Virginia BUILT Tier Three Guidance

Management Leadership and Employee⁶ Involvement

Take proactive steps to build on earlier gains to improve the culture, systems, policies, and procedures that support a safe and healthy work environment.

Management Commitment

Actions to Achieve Desired Outcomes

1. **Safety and Health Vision and Mission Statements.** Continue to communicate the company's Safety and Health Vision and Mission statements and take necessary steps to ensure all employees understand the statements. Ensure that appropriate information about the company's Safety and Health Vision and Mission Statements becomes a routine part of the training for new employees.
2. **Leadership by example.** Management continues setting an example through behaviors that demonstrate total commitment to safety and health (see examples in Tier Two). Ensure total involvement of all executives, managers, and supervisors in the safety and health related activities and programs.
3. **Adequate resources and safety and health integration.** Managers continue committing and ensuring the utilization of adequate resources to support safety and health activities and programs. Ensure that safety and health is routinely integrated into all planning processes, both company and key subcontractors.
4. **Safety and health targets and objectives.** Company and key subcontractors review, revise, and continue communicating, as appropriate to this Tier, the previous year's safety and health targets and objectives, as well as the policies and procedures to meet them. Ensure that safety and health targets and objectives are routinely considered in planning for and implementing the various activities and program
5. **Clear lines of communication with employees and employee access.** Continue to take necessary action to clarify lines of communication with all employees and subcontractors and ensure reasonable access to senior management with regard to safety and health issues. Take proactive steps to encourage open dialogue between management staff and employees.
6. **Clear responsibilities, authority, and accountability for safety and health.** Company and key subcontractors continue clarifying safety and health expectations for each employee. Ensure that all workers understand and accept their safety and health roles and responsibilities. Continue supporting the authority of designated staff members who are accountable for achieving safety and health targets and objectives. In addition:
 - a. Ensure that safety and health performance elements have been incorporated into the written job descriptions and performance plans of all employees, including managers, supervisors, and non-supervisory employees, as well as key subcontractors.
 - b. Incorporate safety and health responsibilities into the job descriptions and performance plans of all non-supervisory employees and ensure that every individual's safety and health performance is monitored and evaluated and that everyone receives feedback on their safety and health performance.
 - c. Develop and implement a system of rewards and recognition for exemplary safety and health performance and achievements.
7. **Disciplinary plan.** Improve and continue implementing the disciplinary plan, developed in Tier Two ensuring

⁶ The term "employee" is used in this document to refer to all types of employees, including managers, supervisors, and non-supervisory employees, whether full-time, part-time, permanent, or temporary.

equitable enforcement as required. Enforce the plan to ensure higher levels of compliance to achieve the desired outcomes.

8. **Annual self-evaluation of safety and health management system.** Company and key subcontractors implement systems and written procedures to annually evaluate their safety and health management systems. The evaluations may be conducted by company and/or key subcontractor employees with managers, qualified corporate staff, or trained outsiders. The evaluations must:
 - a. Identify in a written narrative report the strengths and weaknesses of the safety and health management system.
 - b. Contain specific recommendations, timelines, and assignment of responsibilities for improvements.
 - c. Document actions taken to satisfy the recommendations.
 - d. The company must conduct at least one annual self-evaluation of its safety and health management system in this Tier.
 - e. The company must conduct additional self-evaluations each year they remain in the Virginia BUILT program.
 - f. If applicable, there must be a self-evaluation performed immediately prior to construction completion.

Employee Involvement

Actions to Achieve Desired Outcomes

1. **Follow-up Safety and Health Perception Survey.** Company conducts a follow-up Safety and Health Perception Survey to identify further improvements.
2. **Safety and Health Perception Survey Change Plan.** Company continues implementing the Safety and Health Perception Survey Change Plan developed in Tier Two.
3. **Employee notification.** Company continues notifying new managers, supervisors, and non-supervisory employees of their rights and responsibilities under VOSH laws, standards and regulations; of the company's participation in Virginia BUILT and of the fundamental principles of Virginia BUILT. All changes will be incorporated into the company's orientation training for new employees and subcontractors. Take proactive steps to encourage all workers to freely exercise their rights, especially that of freely reporting hazards in the workplace. At least annually, reinforce policies for all company and subcontractor employees of these rights and responsibilities.
4. **Employee involvement.** Take proactive steps to ensure full implementation of the employee involvement plans developed in Tier Two. Additionally for Tier Two the contractor will:
 - a. Ensure that all the safety health teams needed to achieve the required outcomes for Tier Two are established and that there is broad and active employee participation in these teams.
 - b. Ensure that audits, incident investigations, self-inspections, and job hazard analyses are routinely conducted by regular teams that have broad and active employee representation.
5. **Take proactive steps for key subcontractor employee participation.** Encourage more active and open worker participation by all key subcontractors' employees and continue to develop programs to include more participation for key subcontractor employees where appropriate.

Subcontractor Worker Coverage

Actions to Achieve Desired Outcomes

1. **Adherence to Rules.** Ensure subcontractors and multi-tier subcontractors are aware of company safety and health rules and continue to enforce for safety and health violations.
2. **Subcontractor selection and oversight.** Continue to improve and implement the subcontractor oversight program. Take proactive steps to ensure that subcontractor employees receive safety and health protection equal to that received by company employees. Ensure employees adhere to the company's safety and health rules and are promptly removed for safety and health violations. Also, company management will consider contractors' safety and health management systems and performance in selecting subcontractors.
3. **Subcontractor hazard correction.** Ensure that the subcontractors have the ability to identify, correct, and track uncontrolled hazards in work areas they are responsible for (*i.e.*, uncontrolled hazards include those that cannot be immediately corrected, such as industrial hygiene and ergonomic issues).
4. **Removal Policy.** Ensure subcontractors and multi-tier subcontractors are aware of the penalty policies and their possible removal for serious safety and health violations that go uncorrected.
5. **Safety and health management systems for subcontractors.** Continue working with subcontractors and encourage and support their development and operation of their own effective safety and health management systems.

Worksite Analysis

Take proactive steps to maintain and continuously improve the Company's system for identifying basic and unforeseen safety and health hazards, evaluating their risks, prioritizing them, and recommending methods to eliminate or control hazards to an acceptable level of risk.

Actions to Achieve Desired Outcomes

1. **Initial Survey.** Company and key subcontractors repeat the initial survey only if necessary by significant changes (*e.g.*, changes in processes, equipment, hazard controls, etc.).
2. **Hazard Analyses of Routine Jobs, Tasks, and Processes.** Company and key subcontractors continue conducting hazard analyses and follow guidelines specified in Tier One to identify, analyze, and control hazards. Specifically, for this Tier:
 - a. Identify hazards of routine jobs, tasks, and processes.
 - b. Recommend adequate hazard controls by conducting task-based or system/process hazard analyses when the routine jobs, tasks, and processes have written procedures, recommended by other studies and analyses for a more in-depth analysis.
 - c. Are determined by the Virginia BUILT Participant to warrant a hazard analysis.
3. **Hazard Analysis of Significant Changes.** Company and key subcontractors continue to identify and document the potential safety and health hazards of significant changes including but not limited to non-routine tasks (*e.g.*, performed less than once a year), new processes, materials, equipment, and facilities to identify uncontrolled hazards prior to the activity or use. Recommend adequate hazard controls (*i.e.*, uncontrolled hazards include those that cannot be immediately corrected, such as industrial hygiene and ergonomic issues).
4. **Pre-use Analysis**

- a. Company and key subcontractors, when considering new equipment, chemicals, facilities, or significantly different operations or procedures, will continue to conduct a pre-use analysis (defined in Tier One) to review the potential safety and health impact on the workers at a level of detail appropriate considering the perceived risk and the number of people who may be affected.
 - b. Company develops and begins implementing a plan for how to integrate this practice into the procurement/design phase to maximize the opportunity for proactive hazard controls and requires that key subcontractors adopt and implement the company or an equivalent plan.
 - c. Company and key subcontractors take proactive steps to ensure that pre-use analysis continues to be integrated into the procurement/design phase.
5. **Industrial Hygiene program.** Company and key subcontractors continue implementing the IH programs to identify, analyze, and control health hazards to prevent occupational disease.
6. **Routine self-inspections.**
- a. Company and subcontractors continue implementing the documented system for routinely scheduled self-inspections of the workplace developed in Tier One.
 - b. Company and subcontractors continue conducting self-inspections by designated safety and health staff, with the participation of other non-supervisory employees.
 - c. Company and subcontractors take proactive steps to ensure that self-inspections are routinely conducted and the entire work site is covered at least weekly.
7. **Hazard-reporting system.** Company and key subcontractors continue implementing the hazard-reporting systems and encourage more active reporting. Implement program improvements as needed. Ensure regular feedback to all employees on the status of hazards reported (*e.g.*, through meetings, newsletters, e-mail messages, bulletin board postings, Intranet postings, etc.). Take proactive steps to encourage all workers to freely make suggestions and report hazardous conditions without fear of retaliation.
8. **Investigation of incidents and near-hit incidents.** Company and key subcontractors continue investigating incidents and near-hit incidents, as needed, following the guidelines specified in Tier Two.
9. **Trend Analysis.** Company takes proactive steps to implement systems for trend analysis of company and key subcontractor safety and health information to ensure that the process takes place regularly (at least annually) as scheduled, for all types of safety and health information and is used in setting future targets to address identified trends of incidents, injuries and illnesses.

Hazard Prevention and Control

Take proactive steps to fully implement and continue improving already established systems to prevent and control hazards.

Actions to Achieve Desired Outcomes

1. **Certified professional resources.** Company and key subcontractors continue to provide necessary resources such as appropriate use Certified Safety Professionals (CSP), Certified Industrial Hygienist (CIH), and other professionals and experts as needed based on the risks associated with the work contracted.

2. **Hazard elimination and control methods.** Company and key subcontractors continue to pro-actively identify hazards and selecting options or combinations of options to eliminate or control hazards using the most appropriate methods (*i.e.*, engineering controls including protective safety devices, administrative controls, work practices, and personal protective equipment). Correct all hazards identified in this and previous Tiers, including long-term abatement projects, before graduating from Tier Two.
3. **Hazard control programs.** Company and subcontractors continue to maintain all hazard control programs required by a VOSH standard, complying with all rules, requirements, and guidelines. This includes an annual review and training, if required. Take proactive steps to establish hazard control programs, if any, required by new VOSH standards and to modify or update existing programs, as needed.
4. **Hazard correction tracking.** Company and key subcontractors continue to implement and improve the company's documented hazard tracking system. Take proactive steps to improve the tracking system, ensure that it is fully implemented, and communicate with all workers throughout the process on the status of specific hazards identified until they are totally abated.
5. **Preventive maintenance of equipment.** Company and key subcontractors continue to implement the preventive maintenance schedule on equipment to prevent any hazardous conditions. Take proactive steps to ensure that the company and key subcontractors have an established, routinely-observed preventive maintenance schedule and that preventive maintenance is automatically part of future systems.
6. **Occupational health care program.** Company and key subcontractors take proactive steps to continue providing effective occupational health care programs, including:
 - a. Provisions for access to or availability of licensed health care professionals, needed health services, and emergency medical care. Improve the program based on all available safety and health information.
 - b. Expand use of licensed health care providers which may include visits to sites, to help identify causes and symptoms of occupational injuries and illnesses. Ensure care provided is within the scope of the contracts, licensure, and standard operating procedures.
7. **Emergency preparedness and response.** Company and key subcontractors continue to improve, communicate, and implement the written procedures for responding during all shifts to all types of emergencies. Dependent upon project size and/or complexity, conduct at least one evacuation drill and assess how well the procedures worked. Encourage use of AEDs, as appropriate, and provide necessary training for their use. Take proactive steps to ensure full implementation and automatic tracking of the company's emergency preparedness and response program and procedures. Establish a hazardous material team if necessary and consult with local fire department to ensure adequate coverage for fire, explosion, or chemical release.

Safety and Health Training

Take proactive steps to provide and improve training to all staff to help them acquire and maintain the knowledge and skills they need to better perform their safety and health responsibilities.

Actions to Achieve Desired Outcomes

1. Company and subcontractors continue to provide training to all workers following the general guidelines specified in Tier Two.
2. Company and key subcontractors take proactive steps to improve and continue providing training on specific topics, as needed.
3. Company and key subcontractors provide training for workers on how to recognize and control hazardous conditions and the signs and symptoms of workplace related illnesses and injuries.