

Great Western Painting

Subcontractor Management Plan (SMP)

SUBCONTRACTOR MANAGEMENT PLAN (SMP)

It is our responsibility to review the safety efforts made by subcontractors who may be working with us.

All subcontractors with whom we may work will be **pre-qualified** by reviewing their safety programs, safety training documents, and safety statistics.

Raw safety metrics (measurements) would include:

1. A written safety program.
2. Safety training documentation/certification.
3. Documented safety meetings.
4. Documented job site inspections.
5. Documented enforcement policy and procedures.
6. A demonstration of management's commitment to safety.
7. A demonstration of their ability of doing the type of work for which they are being hired which would include insurances, licenses, equipment (or the ability to rent equipment), etc..

While the above could be considered a commitment to safety, they do not indicate, in and of themselves, whether safety procedures are followed in practice.

Acceptable safety metrics are **measurable** "trailing safety indicators" and include:

EMR– Experience Modifier Rate:

EMR is the rate used to calculate worker's compensation insurance premium. It is calculated by an advisory organization (also known as rating bureaus) such as the National Council on Compensation Insurance based on historic loss and payroll data of a particular insured.

TRIR - Total Recordable Incident Rate:

TRIR Includes medical treatment, restricted duty, job transfer, days away, and higher. Excludes first aid and close calls.

DART - Days Away / Restricted (duty) / (job) Transfer:

DART excludes medical treatment, first aid, and close calls. Value of this indicator is for case management evaluation purposes (e.g., return

to work on restricted basis is good versus staying out until 100% "healthy" again.)

DACR — Days Away Case Rate:

DART minus restricted duty and job transfer.

Using the above indicators:

We will ask our potential subcontractors to provide:

1. Documented evidence of their designated OSHA Total Recordable Incident Rate (TRIR) with NAICS Code, which will be considered as one indicator of the effectiveness of their safety and health program, and will also be considered as part of the subcontractor evaluation. They must also provide their current Recordable Incident Rate (RIR) and the previous two year's TRIRs.
2. Documented evidence of their OSHA DART rate (Days away from work, days of restricted work activity or job transfer) with NAICS Code, which will be considered as one indicator of the effectiveness of their safety and health program, and will also be considered as part of the subcontractor evaluation. They must provide their current DART rate and the previous two year's DART rates.
3. Documented evidence of their designated Safety Experience Modifier Rate (EMR) used to calculate Workmen's Compensation Insurance, which will be considered as one indicator of the effectiveness of their safety and health program and will be considered as part of the subcontractor evaluation. They must provide your most current EMR rating and the previous two years' EMR ratings.

Note: Those having a current EMR rating above 0.99 must submit a detailed explanation that addresses any mitigating circumstances that caused their EMR rating to exceed .99. This explanation should include any corrective action taken.

Prior to initiation of work, a pre-job meeting and safety orientation will be held with all subcontractors to apprise them of the protective measures we have determined to be appropriate. At this meeting, all safety requirements of the contractor for whom we are working will be conveyed to our subcontractors. If permitted, our subcontractors will attend all safety orientation meetings provided by the contractor for whom we are working.

Input and suggestions from subcontractors will be solicited. Attention will be given to hazards one subcontractor may create and the measures they will take to prevent other subcontractors from these exposures. One measure that will always be taken is the sharing of appropriate Material Safety Data Sheet information.

The below four major elements of safety management that apply to our operations also apply to our subcontractors:

- a. management commitment and employee involvement.
- b. hazard analysis.
- c. hazard prevention and control.
- d. safety & health training.

Subcontractors who are working for us must attend regularly scheduled documented safety meetings conducted by our competent persons.

Subcontractors who are working for us must conduct regular and frequent job site inspections and may document these inspections using our safety inspection checklists or their own.

At the completion of each job, **a post-job safety performance review** of our personnel as well as the subcontractor's personnel will be completed to ensure that all potential deficiencies are eliminated.

JOB HAZARD ANALYSIS **OSHA Booklet 3071 Job Hazard Analysis**

All employees and all subcontractors will read the above OSHA Booklet 3071, Job Hazard Analysis and use the information contained therein to complete our Job Task Safety Analysis Forms which are located with our job site forms within our project manuals.

Using the above referenced booklet and other training materials, employees and subcontractors will be trained in the hazard identification process.

The formal process to identify potential hazards is as follows:

1. A Certificate of Workplace Hazard Assessment will be prepared, signed and dated, by the PPE Program Administrator, indicating that a hazard assessment of our job sites and methods of operations has been accomplished. This hazard assessment will focus on the need for PPE which cannot be eliminated through engineering or administrative controls.
2. Because they have insight to the hazards involved, employees and subcontractors who actually perform job tasks will be included in job hazard analysis.
3. A review will be made of previous accidents and injuries as well as "near-misses" to determine if existing hazard controls are adequate or need improvement.

4. In discussion with employees and subcontractors, ideas to eliminate hazards will be discussed and formalized for inclusion on our job task safety analysis form which follows this page.
5. Hazards associated with various tasks will be ranked and prioritized with the jobs that possess hazards that present unacceptable risks, based on those most likely to occur and with the most severe consequences identified for first priority for analysis.
6. The job task safety analysis form will be completed for each task and, as a matter of course, hazard identification will be performed on all job tasks, both routine and non-routine, before actual work is performed. Hazard identification would be prepared for new processes, changes in operation, products or services, as applicable.

Through frequent and routine job site inspection, review of incidents [or lack thereof], and employee and subcontractor feedback, the above will insure that the identified hazards are mitigated. Should problems occur or a potential risk/hazard be discovered, work will stop until the job task hazard analysis form is adjusted to correct any deficiencies found.

The above review process will take place on all job tasks to ensure that new hazards were not created while eliminated others.