

Subcontractor Safety Performance Program

MSC-PRAC-30463

Revision 0

Effective Date: November 30, 2009

Topic: Safety and Health

Subcontractor Safety Performance Program

PURPOSE	This practice identifies a key aspect of the Safety and Health (S&H) program, and defines the overall process for conducting safety qualification and performance evaluations on subcontractors and sub-tier contractors.
SCOPE	<p>This practice includes the following major sections:</p> <ul style="list-style-type: none">• General Requirements• Subcontractor Safety Qualification• Subcontractor Safety Performance Evaluation <p>The requirements of this practice are consistent with the requirements published in the Hanford Mission Support Contract (MSC) Safety and Health virtual manual.</p>
APPLICATION	This practice applies to all Mission Support Alliance (MSA) construction and subcontractors.
GENERAL REQUIREMENTS	Records generated during the performance of this activity are to be generated, received, processed, and maintained by MSC in accordance with MSC-PRO-10588 .
SUBCONTRACTOR SAFETY QUALIFICATION	<p>Qualification evaluations are used by S&H as acceptance/rejection criteria in the bidding process for construction contracts.</p> <p>The Subcontractor Responsibility Determination Safety: Point Scale Work Sheet, form A-6004-289 , is utilized for examining and qualifying all construction subcontractors. The responsibility determination is conducted within the past year.</p> <p>NOTE: <i>When a previously completed responsibility determination is used for a current contract, the subcontractor/sub-tier contractor's current OSHA 300 Log is requested for review by S&H.</i></p> <p>Subcontractors evaluate their sub-tier contractors and provide documentation to MSA that their sub-tier contractors meet the MSA qualifying requirements on the Contractor Safety Responsibility Qualification Submittal provided in the Request for Proposal package. MSA subcontractors are responsible and accountable for the sub-tier contractors they employ, INCLUDING THEIR SAFETY PERFORMANCE.</p>

Subcontractor Safety Performance Program

S&H begins the process upon receipt of the following items from the subcontractor/sub-tier contractor using form [A-6004-289](#) :

- Workman's Compensation Risk Ratings or Experience Modification Rates (on provider's letterhead) for the past 3 years (including the current year), or for as many years as the company has been in existence up to 3 years.
- Occupational Safety and Health Administration (OSHA) 300 Log (or equal) year-end summaries (signed and dated by a company representative) for each of the past 3 years, or for as many years as the company has been in existence up to 3 years.
- Total employee hours worked by company employees for each of the past 3 years, or for as many years as the company has been in existence up to 3 years.
- Copies of transmittal letters (describing the outcome and number of citations if any) from each OSHA, Washington Industrial Safety and Health Administration (WISHA), and other OSHA state-plan state inspection in the past 3 years. If no inspections have ever been performed, a signed statement to this effect on company letterhead is required.
- North American Industry Classification System (NAICS) code number.

Subcontracts & Procurement provides S&H with safety performance evaluations performed on the subcontractor in the past 3 years.

**Worker's
Compensation Risk-
Ratings 3-Year
Average**

Identify the overall average "experience factor" from each year's Industrial Insurance Rate Notice from the Washington Department of Labor and Industries (or equivalent from other states). If work is done in multiple states during a single year, average the experience factor by including all states in which work took place. Weight each experience factor by percentage of total employee hours for the year.

Calculate a combined average from all years submitted.

Compare the combined average to the point scale.

Circle the corresponding point description.

**Incidence Rates –
3-Year Average**

Total the employee hours from the submittals and calculate an overall average.

Subcontractor Safety Performance Program

Identify and document the following categories on page 2 of form [A-6004-289](#) from the OSHA 300 Log (or equal) summaries submitted by the subcontractor/lower-tier contractor:

- Number of total recordable cases
- Total cases involving days away from work and days of restricted work
- Total cases involving only days away from work
- Total days away from work and days of restricted work

Average the totals from each of the 3 years, in each category, to identify overall averages for each category.

Multiply the overall average in each category by 200,000. Divide the products by the overall average of employee hours. The result is the 3-year average incidence rate for each category.

Divide the 3-year average incidence rate for each of the 3 “cases” categories by the corresponding “industrial” incidence rate (based on the contractor’s NAICS or normal job description [such as painting, electrical, heavy construction – except highway]) in the Bureau of Labor Statistics (BLS) “Incidence rates of nonfatal occupational injuries and illnesses by industry and selected case types,” on the BLS Internet at <http://www.bls.gov/iif/oshsum.htm> for the most current year.

Divide the 3-year average incidence rate for “days” by the 3-year average “lost workdays” incidence rate for “construction” published by the U.S. Department of Energy (DOE) on the Internet at <http://tis.eh.doe.gov/cairs/cairs/dataqtr/menu.html> to obtain a percentage of the average.

Compare the percentage in each category to the respective point scale on page 1 of form [A-6004-289](#) .

Circle the corresponding point description.

Deduct 1 point for each fatality.

Subcontractor Safety Performance Program

MSC-PRAC-30463, Rev. 0

Effective Date: November 30, 2009

Page 4 of 6

Average Number of Violations per OSHA, WISHA, and Other OSHA State-Plan State Inspections

Add the number of serious, repeat, and willful violations described in the transmittal letters submitted. Do not include general or de minimus violations.

NOTE: A review/comparison of submittal(s) is performed against inspection data contained in the "OSHA inspection/violation" database on the Internet at <http://www.osha.gov/pls/imis/establishment.html>.

Divide the total number of serious and/or repeat violations by the total number of inspections. The result is the number of violations per inspection.

Compare to the point scale.

Circle the corresponding point description.

Deduct 1 point for each willful or egregious violation.

Past Safety Performance Evaluations

Add 3 points for each outstanding evaluation, 0 points for each satisfactory evaluation, and deduct 3 points for each unsatisfactory evaluation. Obtain an average for all evaluations.

Point Total – Responsibility Determination

Add/subtract the circled point descriptions to arrive at a total.

Compare the total to the "required" point total. A score of 4 is required to be "found responsible" as a result of this evaluation.

Based on the comparison, place an X in the appropriate "Responsibility" box.

The form is signed by S&H.

S&H retains a copy of all submittals and work sheets, and submits form [A-6004-289](#) to the designated Buyers Technical Representative (BTR).

SUBCONTRACTOR SAFETY PERFORMANCE EVALUATION

Subcontractors are evaluated on their performance at least every 6 months by S&H. If the contract is less than 6 months in length, then the evaluation period is for the duration of that contract. This practice and the evaluation criteria are briefly discussed at the preconstruction meeting prior to beginning work.

Subcontractor Safety Performance Program

Process

NOTE: *MSA subcontractors are not required to implement the following evaluation process for their sub-tier contractors.*

For subcontractors (including their sub-tier contractors) currently working on site, an informational meeting is held for each at the time their evaluation period is scheduled. The meetings are initiated by S&H, and attended by S&H, the applicable BTR, construction management, and the subcontractor's and sub-tier contractor's management. A brief overview of this practice and of the evaluation criteria is discussed at the meeting.

S&H initiates the *Subcontractor Safety and Health Performance Evaluation* form, [A-6004-288](#).

S&H completes the Safety Performance Evaluation, inputs applicable data received from the sources below, and assigns appropriate point values:

- MSA Incident Tracking System (ITS), or an equivalent tracking process/method, provides status on industrial injuries and illnesses.
- Safety Action Tracking System (SATS), or an equivalent tracking process/method, provides status on the subcontractor and its sub-tier contractor's noncompliance to the S&H practice requirements and OSHA standards.
- Safety inspections conducted in accordance with practice [MSC-PRAC-30460](#), *Safety and Health Compliance Inspection and Management Walkthroughs*.
- Event/occurrence reports.
- An overall assessment of subcontractor program implementation and performance, including a subcontractor's management of its lower/sub-tier contractors.

S&H assigns the following applicable rating to the overall assessment of the subcontractor's safety work practices:

- Outstanding = 90 to 100 points
- Satisfactory = 70 to 89 points
- Unsatisfactory = less than 70 points

Subcontractor Safety Performance Program

S&H retains a copy of the data used in the subcontractor safety evaluation process and the completed form [A-6004-288](#). The original form A-6001-288 is submitted to MSA Subcontracts & Procurement.

FORMS

Subcontractor Safety and Health Performance Evaluation, [A-6004-288](#)
Subcontractor Responsibility Determination Safety: Point Scale Work Sheet, [A-6004-289](#)

RECORDS IDENTIFICATION

Records Capture Table

Name of Document	Submittal Responsibility	Retention Responsibility
Subcontractor Safety and Health Performance Evaluation, A-6004-288	Safety and Health	Subcontracts & Procurement
Subcontractor Responsibility Determination Safety: Point Scale Work Sheet, A-6004-289	Safety and Health	Buyers Technical Representative

REFERENCES

[MSC-PRAC-30374](#), *Construction Work Package*
[MSC-PRAC-30376](#), *Construction Document Control*
[MSC-PRAC-30460](#), *Safety and Health Compliance Inspection and Management Walkthroughs*,
[MSC-PRO-10588](#), *Records Management Processes*.