Leadership Commitment

Cultural Transformation

Process and Systems

Results

2021 STEP CONTRACTOR KEY COMPONENTS



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CONTRACTOR KEY COMPONENTS OF SAFETY SELF-ASSESSMENT WORKSHEET

The Contractor Key Components of an effective **world-class safety management system** is listed below. Each component contains columns that describe four levels of safety performance. Select the column that BEST describes your company's performance. Remember, each scoring column describes a set of actions/policies that your company currently undertakes. In order to achieve a score, your safety **program must contain ALL the listed criteria.** Any scores on the STEP application that do not match any of the four available scoring options in each of the Contractor Key Components will automatically be rounded down to the nearest listed score.

LEADERSHIP

L1. TOP MANAGEMENT ENGAGEMENT

12	8	4	0
 Owner/CEO/top management leadership directly and actively participates in the safety process Top management instills personal accountability for safety throughout the company Top management tracks and biannually reviews safety goals/objectives for the company Top management solicits continuous feedback on the safety process Top management commits resources (money, time, personnel, equipment, supplies, etc.) for the safety process necessary to achieve goals Safety performance is assessed in everyone's performance appraisal (executive and field employees) Top management integrates safety into every facet of company operation 	 Top management participates in the safety process Personal accountability for safety is expected, but there is little or no recourse if not demonstrated Top management is aware of safety process goals/ objectives, but does not track progress Top management provides the resources necessary for safety compliance 	 Top management supports safety, but does not actively participate There is little personal accountability for safety – a "just be careful" culture exists Limited funds are provided for safety 	 Top management is not involved in the safety process and demonstrates little interest in it Safety is left to supervisory personnel to handle "as needed" There is no accountability for safety Little or no funding is provided for safety

L2. SAFETY POLICY STATEMENT

6	4	2	0
 Is in writing and is signed and by top management Is explained to employees at time of new hire orientation Explains the value of safety in the company Commits to protecting employees, continually improving the program, involving employees in the safety process and meeting regulatory obligations States universal accountability for safety in the company Is posted or part of employee safety policy 	 Policy exists and is in writing Policy is not explained to employees, but most know of its existence Explains employer's general commitment to a safe workplace Is posted, is part of the employee safety policy or is in the company safety manual 	 Policy exists, but is not posted nor in safety manual Not explained to employees and most do not know 	• No policy exists

L3. SAFETY RESPONSIBILITES

9	6	3	0
 Responsibilities for safety are clearly defined for everyone in the company, including specialty contractors. Responsibilities include, but are not limited to, hazard and injury reporting, PPE use, safety policy compliance and all aspects of the GC/ owner's safety program. Supervisory personnel have additional responsibilities that are reviewed with them at time of hire or promotion 	 Responsibility for safety is defined for everyone in company Accountability for safety is not always universally applied Explained to employees at time of new hire orientation Is in writing and is part of employee safety policy 	 Responsibility for safety rests solely with a designated safety coordinator or safety committee Responsibilities are not in writing All employees know is that they are responsible for "being safe" There is little or no accountability for safety 	• Responsibility for safety has not been defined within the company
 A policy to hold everyone accountable (including specialty contractors) for safety is in 			

L4. RESOURCES FOR SAFETY

place and is universally applied.

• All safety resources (funds, time, personnel,
equipment, supplies, etc.) are regularly
hudgeted or invested

6

 Return on safety investment is tracked (actual or projected) to evaluate effectiveness of resource allocation and to guide future expenditure decisions

- Resource funding and expectations are explained to supervisory personnel upon hire or promotion
- Reasonable resources are budgeted or invested in safety
 Supervisory personnel are

4

- generally aware of company resources available
- Minimal investments are made in safety

2

 Money is taken from general funds as needed to react to safety needs (GC mandates, OSHA fines, incidents, etc.)

Resources are not made available for safety

Λ

L5. SAFETY PROGRAM PERFORMANCE REVIEW

discuss results and expectations

6 4 2 Λ • Top management reviews the safety program • Top management reviews the Regular (pre-determined • No review of safety program performance biannually frequency) reviews of safety performance is performed safety program annually program performance does not • The emphasis of the review is on whether the Some criteria exist against which occur program is producing expected results and performance is measured • Limited top management where opportunities for improvement exist · Process is not documented involvement-mainly left Defined criteria exist against which Results do not significantly to someone else (safety performance is measured (e.g., safety surveys affect safety staff and/or administrator, insurance conducted, trainings held, incidence rates, loss supervisor evaluations company, etc.) ratios, progress toward annual goals, safety • Results are eventually discussed meetings, OSHA inspection record, prevention • Subjective review of safety with safety staff and/or of recurring incidents/ hazards, employee activities - mainly serves as participation, etc.) supervisory personnel a "year in review" and not an assessment of performance and Results are documented improvement opportunity · Results impact safety staff and supervisor • Results may or may not be annual performance evaluations reviewed with supervisory • Following each review, meetings are conducted personnel with safety staff and supervisory personnel to

CULTURE

C1. EMPLOYEE PARTICIPATION

9	6	3	0
 Employees are actively engaged in the safety process (e.g., safety surveys, hazard reporting, incident investigation, safety instruction, toolbox talks, policy development/auditing, new hire mentoring, committees, job safety analysis development, pre-planning, etc.) Supervisory personnel are aware of these opportunities and actively encourage employee involvement Participation opportunities are evaluated to ensure they are meaningful, necessary resources are available (time, money, staff, equipment, etc.) and potential barriers are identified and eliminated 	 Opportunities for employees to participate in safety process exist, but are not specifically documented Supervisors are provided limited training in soliciting employee participation, but nonetheless encourage involvement Employees may be aware of opportunities, but there are no specific participation expectations There is a limited focus on identifying and eliminating potential barriers to participation 	 Employees are encouraged to participate in the safety process, but no concerted efforts are made to engage them Employees are offered a general communication channel: "If you have any questions or concerns, speak with your foreman." An employee suggestion/ comment process is in place 	• There are no opportunities for employees to participate in the safety process

C2. SUBSTANCE ABUSE PROGRAM

6	4	2	0
 The company's safety policy explains its substance abuse program The policy includes random, pre-employment 	 The company has substance abuse verbiage in the employee safety policy 	 The company has substance abuse verbiage in its safety manual 	 The company has no policy regarding substance abuse testing
and reasonable suspicion substance abuse testing	 Substance abuse testing is for pre-employment only 	• Drug/alcohol testing is inconsistent	
 The policy is consistent and actively enforced Supervisory personnel are trained in workplace 	 The company makes a minimal effort to enforce policy 	• Company makes no or little effort to enforce the policy	
substance abuse recognition	• Supervisors are trained in	Subcontract language does not	
 Employee substance abuse prevention education initiatives are offered 	hazards of substance abuse on the job	include compliance	
• The company has an employee assistance program (EAP)	 Specialty contractors are contractually required to conduct pre employment testing 		
 The company keeps counseling and testing records 			
 Specialty contractors are contractually required to have programs equal to or exceeding the general contractors 			

C3. SAFETY PROGRAM GOAL SETTING

9	6	3	0
• A formal process is in place to annually assess or establish safety program goals	 Safety program goals are established periodically 	 Informal or infrequent safety program goals are established 	 There is no process of safety program goal-setting
 Action plans are developed, documented and implemented to assure goals are accomplished in a timely manner Progression of action plans are tracked, with status reports and feedback from those assigned the tasks Top management reviews goals, action plans and status reports with staff to provide feedback, direction and support of initiatives Process is in place to evaluate degree of effectiveness action plan had in achieving end goal 	 A plan to achieve goals has been decided, but not documented Status of action plan is informally checked, but with no set frequency and with little follow-up or solicitation of feedback Top management plays minor part in safety goal-setting process No process is in place to gauge the effectiveness of the action plan in achieving end goal 	 There is little or no documentation or employee knowledge of goals No realistic action plans are developed to accomplish goals Top management is not involved Goals seldom tracked, reviewed or achieved 	

C4. SUPERVISOR SAFETY MEETINGS*

3	6	3	0
meetings • The employer begins each meeting with a safety moment • Meetings include:	 At least monthly, the employer conducts supervisor safety meetings Meeting includes a status report on site safety activities Serious incidents are reviewed 	 Supervisor safety meetings are held occasionally (less than monthly) There is general discussion of the safety information given to supervisors Serious incidents are usually reviewed 	The employer does not conduct supervisor safety meetings

C5. NEW HIRE SAFETY ORIENTATION

6	4	2	0
 A documented safety orientation process is in place for all newly hired or transferred employees (i.e. who gets orientation, when, how, by whom and topics to be covered) Safety orientation topics include, but are not limited to: Explanation of employer safety commitment and expectations Individual safety responsibilities and accountability PPE expectations with skills demonstration (wearing harness, adjusting guards, PPE use, etc.) Basic and advanced safety rules that pertain to site and/or major job hazard exposures Hazard communication Hazard, injury and emergency reporting procedures Review of substance abuse policy Identity of key competent persons and their specific roles Orientation platforms include instructor-led, video published training and other written materials New hires are assigned a special designation (decal, hard hat color) or safety mentor until their orientation process is complete New hire performance evaluation process is established to give feedback to new hires on pre- determined frequency (30 days and 60 days) Documented records are maintained showing initial/promotion employee safety orientations have occurred 	 Safety orientation is given to new employees; however, the process has not been formalized Safety orientation topics include at a minimum: Explanation of employer safety commitment and expectations Review of substance policy PPE expectations Basic safety rules that pertain to site and/or major job hazard exposures Hazard communication Hazard, injury and emergency reporting procedures Process may or may not involve a special designation (decal, hard hat) or safety mentor There is no new hire performance evaluation process Record of safety orientation, with employee signature, is maintained 	 Informal or on-the-job safety instruction is given to new hires There is no uniform process or list of topics to cover No documentation is maintained 	• No orientation is given to new employees

C6. EMPLOYEE SAFETY TRAINING

12	8	4	0
 Based on an annual safety training needs assessment, a database is developed and instituted (i.e., who needs what, when and who will train) Formal safety training topics include, but are not limited to: Recognition and control of hazards specific to trade/work tasks (e.g., heavy equipment, lift operation, LOTO and arc flash, rigging, crane operation, confined space entry, temp traffic control, hot work, excavation safety, steel erection, blasting safety, noise, lead, asbestos, mold exposure, etc.) First Aid/CPR/AED OSHA topics (e.g., PPE, hazcom, electrical, scaffold, ladder/stairs, fire prevention and protection, tool safety, fall protection and prevention, etc.) 	 Safety training needs are determined each year, but a formal assessment and database are not used Formal safety training topics include: Recognition and control of hazards specific to trade/work tasks (e.g., heavy equipment, lift operation, LOTO and arc flash, rigging, crane operation, confined space entry, temp traffic control, hot work, excavation safety, steel erection, blasting safety, noise, lead, asbestos, mold exposure, etc.) First Aid/CPR/AED 	 4 Informal or on-the-job safety training is arranged as needed There is no established training matrix or database Limited or no training documentation is kept Companies executives exempt from training classes. 	0 • No formal safety training is provided
 Driver safety Pertinent DOT compliance and CDL annual training Training is conducted by competent/qualified 	 OSHA topics (e.g., PPE, hazcom, electrical, scaffold, ladder/ stairs, fire prevention and protection, tool safety, fall protection and prevention, 		
 Companies set minimum levels of training, annually. (OSHA refresher courses, First Aid/ CPR, etc.) Offer families to participate in First Aid/CPR and allow employees opportunities to train employees. Offer safety training to anyone (position/role) within company structure 	etc.) • Training is conducted by competent/qualified safety instructors • Employees are only retrained as required by OSHA and when they which by loging a cofet while		
 Employee training comprehension and understanding is verified and documented (e.g., test, skills assessment, etc.) Records are kept of all training – date, attendees, topics covered and trainer 	 visibly lacking safety skills Companies identify training by role/positions but may not have discipline to follow up or ensure employees understand the need. 		

C7. BEHAVIOR-BASED SAFETY (BBS)*

6	4	2	0
 BBS process is written and the entire company, including top management, has been formally trained in the process of conducting an observation BBS observations are conducted at least daily Data is analyzed weekly and trends are communicated throughout the organization The process allows employees to submit observations anonymously Top management participates in the process, conducting at least one observation per month Site management reviews data weekly and modifies work practices to reduce trends BBS data is shared with site personnel weekly 	 BBS process is written, and the all employees have been trained in the process of conducting an observation BBS observations are conducted, collected and analyzed monthly The process allows employees to submit observations anonymously Top management reviews the data monthly, but may or may not conduct an observation Site management reviews data monthly and modifies work practices to reduce trends BBS data is shared with site personnel biweekly 	 An observation process is in place but is not a formal policy or procedure BBS observations are conducted at least monthly Participation by employees is encouraged Site management reviews data bi-monthly BBS data is shared with site personnel monthly 	• No BBS process is in place

*See Definitions

C8. SUPERVISOR SAFETY TRAINING

9	6	3	0
All supervisory personnel receive training in: Company safety policy	• All Supervisory personnel receive training in:	 Supervisory personnel receive safety training in: 	 There is no specific training program for supervisory
 Company safety policy Employer's supervisor safety expectations First Aid/CPR/AED OSHA 30 Competent person for trade/task-specific topics Emergency response procedures Completing an incident investigation Conducting a jobsite safety inspection or BBS observation Creating a job safety analysis Key points in Leadership and Human Resources Conducting effective meetings Opportunities for professional development are 		1 21	
offered and employees participate in annual refresher safety training • Supervisors have access to a safety subject matter expert (SME) • Dedicated training facilities are available with competent/qualified trainers	 Supervisors have access to sources of safety information or knowledge Annual refresher training is available, but not mandatory 		

PROCESS

P1. INCIDENT INVESTIGATION

9	6	3	0
• Employer reviews all incidents including good catches and potential significant events (PSE).	• Supervisors receive a basic level of incident investigation training	 Supervisors receive little or no incident investigation training 	• Incidents are not investigated to determine causal factors
 Supervisors are trained in the techniques of incident investigation including, but not limited to, root cause*, casual factors and/or fault tree analysis, among many others Incidents are investigated promptly by top management and safety department personnel and a preliminary report is communicated within 24-48 hours Reports are completed for all incidents Documented corrective actions taken Final incident outcomes are openly shared across the organization to improve overall safety performance 	 Incidents, good catches and potential significant events are investigated by site supervision Reports are completed for all incidents Remedial actions are taken to prevent recurrence of similar incidents Employer reviews only serious incidents Final notification of incidents is communicated to all stakeholders 	 Incidents are usually investigated by site supervision, but may be investigated by someone else Reports are not always completed and communicated in a timely manner Little or no attempt is made to identify causal factors or take corrective actions Lessons learned are not shared openly across the organization 	

P2. PRE-PLANNING FOR PROJECT SAFETY*

6	4	2	0
 Project supervision and other key personnel are trained in pre-planning for project safety Safety pre-planning is integrated into the estimate, bid and mobilization/ demobilization stages of projects A checklist or similar document is used to ensure a consistent and comprehensive approach to exposure evaluation and resource needs Project safety plans are regularly updated throughout life of project Contractor Key components of the pre-plan (including updates) are communicated with all site employees (including specialty contractors, if applicable) before implementation 	 Project supervisory personnel may have received some training in the safety pre-planning process, but it is not required Safety pre-planning is required prior to start of site work A checklist or similar document serves as a guide through the process Safety resources are provided as needed 	 There is no established procedure for project safety pre-planning, but some planning is done No checklist or other document is used as a guide Safety resources are often provided only after problems or needs have been encountered 	• No safety pre-planning is done

P3. EMERGENCY RESPONSE/FIRE ELIMINATION PLAN

6	4	2	0
• Company has a comprehensive fire elimination plan (FEP) that includes the following, at a minimum:	 Company has fire elimination plan (FEP) that includes the following, at a minimum: 	 Company has fire elimination plan (FEP) that includes the following, at a minimum: 	 No Emergency Response/FEP exists
 If general contractor, all tiered contractors are contractually bound to follow the FEP 	- Training on the selection, use	- Annual toolbox topic and	
 Training on the selection, use and maintenance of portable fire extinguishers 	and maintenance of portable fire extinguishers	demonstration of how to use a fire extinguisher	
- Hot work recognition, training and permitting to include a 30-minute fire watch	 Hot work recognition, training and permitting to include a 30-minute fire watch 	 Informally communicated, but not documented, evacuation and head count procedures 	
 Only approved flammable and combustible containers are used or allowed onsite 	 Evacuation, assembly point and head count procedures 		
- Frequent and consistent disposal of combustible material (housekeeping)	are published, posted and communicated		
 Evacuation, assembly point and head count procedures are published, posted and communicated 	 Compressed gas is handled, stored and used per manufacturer's 		
- Compressed gas is handled, stored and used	recommendations		
per manufacturer's recommendations - Evacuation procedures and assembly points are established	 Evacuation procedures are established, but not consistently communicated 		

P4. TASK-SPECIFIC SAFETY PROCESS*

6	4	2	0
 6 A task-specific safety process has been established and is consistently used across the company The process is reviewed annually by top management All personnel are trained in using the process Each task is reviewed separately, and the process is complete when outcomes are explained to the employees and employees confirm understanding of the work hazards and mitigation process. Change of conditions require work to be stopped, the process is reviewed and altered to complete the work safely 	 4 A process exists and is utilized on site Supervisory personnel have received training on completing the task-specific planning process The plan is completed prior to the start of onsite operations When conditions change the plan is reviewed for corrections Employees have read, understood and signed off on the plan 	2 • A policy exists but is not consistently utilized on site • A plan exists but is only completed for high- hazard/risk operations • Forms are not reviewed after the work is completed	0 • No task-specific plan exists
• Policy includes, at a minimum, the following;			
- definition of scope of work			
- hazard analysis and control methods			
- continuous improvement provisions			

P5. SAFETY RULES

9	6	3	0
 Safety rules are: In writing and are part of the employee safety policy Explained to employees at time of new hire orientation Clear, concise and easy to understand Specific to trade and/or scope of work operations Enforced equally among all employees Regularly updated to reflect change in company policy and/or regulation Specialty contractors are contractually bound to the general contractor's safety program 	 Safety rules are: In writing and posted, but not necessarily in the employee safety policy Explained to employees at one time or another Specific to trade and/or scope of work operations Usually enforced equally among all employees Periodically updated to reflect change in company policy and/ or regulation If the company is a general contractor (GC), specialty contractors are encouraged to comply with their safety rules 	 Some general safety rules exist, but they are not posted or reviewed with employees Rules that do exist are boilerplate rules and are not necessarily specific to the company's trade and/or scope of operations Safety rules are not regularly enforced Safety rules are rarely reviewed or updated Specialty contractors are not required to follow the GC's safety rules 	• There are no safety rules

P6. TOOLBOX SAFETY TALKS

6	4	2	0
 Toolbox talks are held daily Employees routinely lead the talks The highest-level supervisors onsite are present and participate in the talks Top management occasionally attends and participates Attendance and topics are documented 	 Toolbox talks are held regularly— at least weekly Attendance and topics are documented Supervisors actively solicit employee participation (e.g., volunteer to present talk, share experience, Q&A, etc.) The highest-level supervisors are present and participate Top management occasionally attends 	 Attendance and topics are documented Employees are encouraged to participate 	 Toolbox talks are not held or held only occasionally (less than once per month)

P7. SAFETY INSPECTIONS

9	6	3	0
Monthly jobsite safety inspections are conducted by project manager(s) Weekly jobsite safety inspections are conducted	 Quarterly jobsite safety inspections are conducted by project manager(s) 	 Informal jobsite inspections (walk-through) are made by the site superintendent 	• No inspections are conducted
 Weekly jobsite safety inspections are conducted by the site superintendent(s) Daily jobsite safety inspections are conducted by the site foremen Inspection is documented, along with assignment of responsibility and expected completion date Potentially serious safety issues are corrected immediately 	 Monthly jobsite inspections are conducted by the site superintendent(s) Inspection is documented, along with assignment of responsibility and expected completion date Potentially serious safety issues are corrected immediately Less serious safety issues are 	 There is no documentation or follow-up Safety issues are corrected, in a timely, unspecified manner 	
 Less serious safety issues are corrected promptly Follow-up process to confirm action taken and that it is producing expected results 	corrected promptly		

P8. USE OF PERSONAL PROTECTIVE EQUIPMENT (PPE)

9	6	3	0
 Company has a written PPE policy Company conducts an annual PPE needs assessment that is documented Company continually invests in new and updated PPE, as needed Processes are instituted by which the suitability and effectiveness of PPE is evaluated by field personnel Employees are informed of PPE requirements for each job Employees are trained, prior to use, in PPE selection, inspection, use and care PPE refresher training is conducted at least annually Company PPE policy is consistently and universally enforced 	 The company has a written PPE policy Employees are informed of PPE requirements for each job Employees are trained in PPE selection, inspection, use and care Company PPE policy is consistently and universally enforced 	 A PPE policy exists, but is rarely enforced without pressure from controlling contractors or owners PPE is provided, and its use encouraged Some training on PPE use is provided Company PPE policy is enforced inconsistently 	• No PPE policy exists and use of PPE is left to the discretion of each employee

P9. RECORDKEEPING AND DOCUMENTATION

6	4	2	0
• The company maintains accurate and current records and documents for:	• The company maintains records and documents for:	• The company maintains minimal records, which may or may not be	 No records are kept for safety- related activities or policies
 OSHA injury and illness records (reports, 300 logs and 300A summary log Safety training, including verification of 	 OSHA injury and illness records (reports, 300 logs and 300A summary log) 	up to date: - OSHA injury and illness records (reports, 300 logs and	
learning (test, skills evaluation, etc.)	- Safety training	300A summary log)	
- OSHA-required written programs	 OSHA-required written programs 	- Basic safety policy	
 Employee safety policy Incident investigations 	- Employee safety policy		
- Equipment inspections are documented	 Incident investigations and near fatality/good catches Safety inspections/surveys 		
 Site inspections/surveys, including verification of action taken 		- Safety inspections/surveys	
- Safety orientations	 Equipment, including mobile equipment 		
- Safety pre-planning			
- Loss run analysis			
 Employee exposure and monitoring data and reports 			
- Safety committee meeting minutes			

P10. WORK ZONE/MOBILE EQUIPMENT/VEHICLE SAFETY

6	4	2	0
A written traffic control plan, per the FHWA MUTCD is completed, reviewed, and implemented for all projects, as required. (Answer only if you are responsible for traffic control). Whether self-performed or contracted, the company ensures employees are trained and certified for flagging operations. The company has a formal distracted and defensive driving policy in place that applies 100% to all employees while driving vehicles and mobile equipment and disciplinary action for any violation of said policy. The company has a formal process in place to train and certify company vehicle and mobile equipment operators which include a performance verification and documents those records in personnel files. The company has a formal "spotter" program for aiding and directing vehicles or heavy equipment when backing and/or working near other personnel. Equipment inspections are conducted and documented per OSHA/manufacturers recommendations	 The company has a distracted driving policy in place that addresses no texting while driving company verifies equipment operator's experience at the time of hire but does not have a formal performance verification process in place. The hazards associated with vehicle backing is covered during annual training but and includes a performance evaluation (hand-on practical) but it is not documented in the personnel files. Formal traffic control plans and/or requirements per the FHWA MUTCD are implemented in some, but not every project. (Answer only if you are responsible for traffic control). 	 Flagging personnel are utilized to control traffic, but there is no formal requirement to ensure they are certified. The company does not verify equipment operators experience. The hazards associated with vehicle backing is only addressed during the review of a daily work if applicable to the scope of work for the day. The company does not have a formal distracted driving policy in place but does encourage employees not to text and drive. 	 The Company lacks a defensive driving or phone use policy. Vehicle backing risks is not currently addressed by the company. Vehicle and mobile equipment inspections are not conducted. Planning for work zone traffic control and/or flagging operations is not conducted.

RESULTS

R1. LEADING INDICATORS

6	4	2	0
 Top management reviews leading indicator data monthly 	 Leading indicators are defined; are not post-injury related 	 Leading indicator data is collected monthly 	 No process in place to track leading indicators
 Leading Indicators are defined; are not post injury related Leading indicator data is collected daily and inputted into a format (e.g., spreadsheet, safety app) for analysis Site management reviews leading indicator data weekly Leading indicator data is analyzed for trends against previous week(s) Construction site management reviews leading indicator data weekly and adjust work practices accordingly Company has identified a minimum of four leading indicators 	 Leading indicator data is collected weekly and inputted into a format (e.g., spreadsheet, safety app) for analysis Site management reviews leading indicator data monthly Company has identified a minimum of two leading indicators that are not injury related 	• Company has identified a leading indicator that is not injury related	

R2. TRAILING INDICATORS (REVIEW OF CLAIMS AND KEY SAFETY RATES)

6	4	2	0
 Key company personnel are trained to know the meaning and relevance of key safety performance indicators (KSPI) e.g., EMR, TRIR, DART EMR of the current and previous year is below 0.80 (0.90 for companies with fewer than 100 employees) Employer regularly reviews claims, claim costs and claim trends to gauge impact on company and guide resource allocation 	 Key company personnel are familiar with KSPI's, but may not fully understand meaning or relevance EMR of the current and previous year is below 0.90 (1.0 for companies with fewer than 100 employees) Employer reviews claims with insurer as part of workers' comp policy renewal process 	 Key company personnel are not familiar with KSPI's EMR for current year is at or below 1.0, or; Is at least 1.0 in one of the previous two years, or Has decreased two of previous three years 	• KSPI are unknown