



**WEST VIRGINIA
INDUSTRIAL COUNCIL'S**

**REPORT TO THE
JOINT COMMITTEE ON
GOVERNMENT AND FINANCE
JULY 12, 2010**

**REGARDING SAFETY INITIATIVES
IN THE WV WORKERS'
COMPENSATION MARKET**

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WV INDUSTRIAL COUNCIL REPORT TO THE JOINT COMMITTEE ON GOVERNMENT AND FINANCE REGARDING SAFETY INITIATIVES IN THE WV WORKERS' COMPENSATION MARKET & APPENDICES

SAFETY STUDY RESULTS:

CARRIERS / CARTAGE / TRANSPORT & DELIVERY

Sentinel Transportation, LLC
UPS
UPS Ground Freight, Inc.
FedEx SmartPost
Federal Express Corporation (d/b/a, "FedEx Express")
FedEx Ground and FedEx Home Delivery

HOTELS / INNS / RESORTS

Marriott Int. & Residence Inn by Marriott
The Greenbrier
Snowshoe Mountain, Inc.

INSURERS

TAB 1:

Chartis Casualty Company (AIG)
The Hartford Insurance Group
BrickStreet Mutual Insurance Company
Liberty Mutual Insurance Group
Zurich American Insurance Company

TAB 2:

ACE Group of Insurance Companies
Erie Insurance Group
The Travelers Companies, Inc.
FirstComp Insurance Company (FCIC)
Chubb Group of Insurance Companies

MANUFACTURING

TAB 1:

Severstal Wheeling, Inc.
Royal Vendors, Inc.
Huntington Alloys Corporation
Ball Metal Food Container Corp.

TAB 2:

General Motors, LLC
The Homer Laughlin China Co.
Columbia West Virginia Corporation
Century Aluminum of WV, Inc.
JELD-WEN, Inc.
PPG Industries, Natrium WV Facility

TAB 3:

E. I. DuPont de Nemours & Company, Washington Works
Goodrich Corporation
Guardian Fiberglass
Toyota Motor Manufacturing, West Virginia
Alliant Techsystems, Inc.

TAB 4:

Pepsi Beverage Company
Kingsford Manufacturing Company
SWVA, Inc.

MEDICAL

HealthSouth Corporation
St. Mary's Medical Center
Heartland Employment Services, LLC
Wheeling Hospital
Charleston Area Medical Center, Inc.

MINING

TAB 1:

Aracoma Coal Company, Inc.
U.S. Silica Company
Alex Energy, Inc.
Spartan Mining Company, Inc.
Mettiki Coal WV, LLC
Patriot Coal (On Behalf of Subsidiaries)

MINING (cont'd)

TAB 2:

Highland Mining Company
Performance Coal Company
CONSOL Energy Inc. (On Behalf of Subsidiaries)
Kingston Mining, Inc.
Rockspring Development, Inc.
Amfire, LLC

MUNICIPALITIES

TAB 1:

City of Wheeling
Wheeling Park Commission
City of Huntington
City of Charleston

TAB 2:

City of Parkersburg
City of Fairmont
Fairmont City Police Department
City of Fairmont Fire Dept.

RETAIL

TAB 1:

Kmart Corporation
Dolgencorp, Inc.
Family Dollar Stores of West Virginia, Inc.
Wal-Mart Associates, Inc.
TA Operating LLC

TAB 2:

The Bon-Ton Stores, Incorporated
Wendy's/Arby's Group, Inc.
CBOCS, Inc. (Cracker Barrel)
Kroger Limited Partnership
Guardian Glass Company

RETAIL (cont'd)

TAB 3:

Food Lion, LLC; Delhaize America, LLC
Sears Roebuck & Co.
Lowe's Home Centers, Inc.
Macy's Retail Holdings, Inc.
Elder Beerman

UTILITIES

Dominion Hope Gas
Allegheny Energy Service Corporation
Dominion Transmission, Inc.
VA Elec. And Power
Cabot Oil & Gas Corporation
Chesapeake Appalachia, LLC
American Electric Power Company, Inc.

MISC.

EQT Corporation
Exxon Mobil Corporation
Aker Construction, Inc.
Huntington Bancshares Incorporated
Western and Southern Financial Group
Asplundh Tree Expert Co.

**REPORT TO
JOINT COMMITTEE
&
APPENDICES**

**WEST VIRGINIA INDUSTRIAL COUNCIL'S REPORT TO THE JOINT COMMITTEE
ON GOVERNMENT AND FINANCE REGARDING SAFETY INITIATIVES IN THE
WV WORKERS' COMPENSATION MARKET**

Introduction

West Virginia Code §23-2C-5(c)(6) requires that every two years, the West Virginia Industrial Council (INDC) conduct an overview of the safety initiatives currently being utilized, or which could be utilized, in the workers' compensation insurance market and report the findings to the West Virginia Legislature's Joint Committee on Government and Finance. Pursuant to this Code Section, workers' compensation carriers and self-insured employers are required to provide the Industrial Council any information requested as part of the safety overview.

The Industrial Council, working with the West Virginia Insurance Commissioner, collected three types of data:

(1) A request to the National Council on Compensation Insurance (NCCI), West Virginia's designated workers' compensation rating organization, for data regarding scheduled debits and credits in West Virginia related to safety;

(2) A survey to West Virginia's top ten (10) workers' compensation carriers regarding the safety programs, initiatives and services they offer to West Virginia employers;

(3) A survey to West Virginia's workers' compensation self-insured employers regarding their safety programs.

NCCI, all ten carriers, and ninety-six (96) of the ninety-eight (98) active self-insured employers responded providing an excellent universe of data on which to base conclusions. Below is a summary of the data received, divided into three sections: (I) information received from NCCI; (II) information received from insurance carriers; and (III) information received from self-insured employers. Further, attached at the end of this report are spreadsheets reflecting all the survey responses, including the self-insured employer responses broken down by industry group.

I. NCCI Scheduled Credit and Debt Information for WV Employers

West Virginia law permits workers' compensation carriers to apply scheduled debits and credits to workers' compensation policies for various categories related to workers' compensation risk, many of which are related to safety. Scheduled debits and credits must be approved by the West Virginia Offices of the Insurance Commissioner (OIC). Workers' compensation carriers operating in West Virginia who use a scheduled rating system must use NCCI's scheduled rating plan. The categories for which insured employers are eligible for scheduled debits and credits in this plan are:

- Premises
- Medical facilities
- Classification peculiarities
- Safety devices

- Employees – selection, training, supervision
- Management – cooperation with insurance carrier
- Management – safety organization.

The INDC requested data from NCCI data regarding employer scheduled debits and credits for West Virginia employers. The NCCI provided the following data, based upon policy year 2009:

- 2,830 policies were written in which scheduled rating was applied
- 1,988 policies received a net credit
- The total credit amount received was \$28,191,021, accounting for 5.8% of the state's total standard premium
- 842 received a net debit
- The total debit amount received was \$6,086,291, accounting for 1.3% of the state's total standard premium

Additionally, NCCI was able to provide us with a chart comparing how West Virginia compared to other states on scheduled rating. The information reflected that West Virginia employers receive a lower credit amount compared to other states in West Virginia's region¹, but also receive a lower debit amount. The chart is attached to this Report as Appendix A.

Executive Summary

Unfortunately, NCCI was unable to provide category-specific information on scheduled debits and credits, which would have been more helpful in analyzing specific strengths and shortcomings in safety related debits and credits among West Virginia employers. However, an encouraging fact is that West Virginia's employers receive a substantially higher amount of premium credits than debits. It is safe to say that a significant portion of the credits are due to positive safety metrics, as most of the categories in the plan are related to safety. Obtaining data on schedule rating related specifically to each category would be desirable for future studies, so specific strengths and weaknesses in the various categories can be recognized.

II. Summary of Workers' Compensation Carrier Safety Survey

The survey involved ten (10) questions. A summary of responses to each question is below. Additionally, attached as Appendix B is a chart summarizing the responses to this survey.

- 1. Do you offer safety and loss programs and initiatives to your WV insured employers? If yes, please provide in detail the types of safety programs and initiatives you offer (i.e., resources, consultation, on-site assistance, etc.).***

All respondents indicated that they offer safety and loss control programs and initiatives to their WV customers and that they directly provide safety support to their WV customers.

¹ The other states in WV's region are: Alabama, Kentucky, Maryland, North Carolina, South Carolina, Tennessee and Virginia.

Brickstreet, the insurer with the largest number of WV customers, stated that a number of safety-related resources are available for WV customers. Other carriers responded that they have similar resources. These resources can be delivered on-site by the WV insurers' safety professionals to the employers' facilities for presentation, or can be found on the internet. The resources, in BrickStreet's case, include a safety video library which loans safety training videos to its customers. According to BrickStreet, over 800 titles are available to its customers. All carriers stated that they provide assistance with the development of safety programs, return-to-work (RTW) programs, accident investigation, industrial hygiene and ergonomic services. Carriers further stated that, upon request, they provide formal and OSHA certified safety training to their customers for general industry and construction interests. Additionally, the carriers provide certified defensive driving courses.

Additionally, specialized training in (ergonomic) lift technique, fork lift training and healthcare related topics is also available from all insurers. Further, on-line safety and loss control consultation and telephone based consultation are available according to the responses. All insurers stated that they provide support for loss trend and other causal analysis. Some insurers also stated that they offer in-house industrial hygiene services for their customers.

Several insurers stated that they provide customer support by the use of a standardized means for loss prevention management via internet tools. An example of this tool is Chartis Casualty Company's Global Loss Prevention, Inc.'s Risk Tool System. Other insurance carriers stated that they provide employer support by establishing support units organized within the carrier's business. An example of this situation is ACE Insurance's Global Risk Control Services unit.

2. *Do you offer the services of a unit dedicated (solely to safety and loss) to your WV insured employers? If yes, please describe this unit.*

All but two carriers indicated that they have in-house units within their company dedicated solely to the provision of safety and loss services to insured employers, including insured employer in West Virginia. However, all carriers indicated that they specifically make safety and loss personnel available to West Virginia insured employers in some manner. The responses varied somewhat in how services were provided. Some stated they provide the services of in-state personnel or contractors, while others avail out of state personnel only.

3. *What criteria do you use to determine whether to offer debits or credits to a WV employer pursuant to the NCCI scheduled rating plan? Please specify for each of the following categories in the scheduled rating plan.*

Two insurers surveyed, Travelers and ACE, do not use NCCI's schedule rating plan, and as such did not respond to this question. The ACE Group stated that "the debits or credits are determined based on the individual underwriter's assessment of risk". AIG responded by explaining that although they did not use NCCI's scheduled rating plan exclusively, it is part of the "specific and general information that necessitates adjustment of the pricing of the risk due to risk characteristics which are not reflected in the experience modification". Aside from these responses, below is a summary as to how the responding carriers approach each category:

Premises – The responses varied from “how effectively hazards are controlled on the premises” to “adequacy of the premises for its current use, protection systems such as automatic sprinklers or fire detection, life safety systems, fire doors and walls, etc.” Other insurers alluded to the suitability of the structure for occupancy and the potential for both “expected and unexpected hazard exposure”. Housekeeping and maintenance activities within the business were also mentioned as common review items.

Medical Facilities – Access to medical facilities was a common theme among respondents. The availability of on-site first aid and first aid training provided to first responders within the insureds’ businesses were also both mentioned as common considerations.

Safety Devices – Survey results indicate that the appropriate use of personal protection equipment (PPE) by the workforce is a consideration. Machine guarding and maintenance were also considered common items of concern among the survey respondents. Further, training for fall protection and the proper use of the associated specialized restraint devices, proper training and application of lock-out/tag-out programs and proper material handling were items of concern.

Employees – Selection, Training & Supervision – Responses received focused primarily on the employer’s ability to select and train individuals who are most likely to avoid injuries and return to work quickly if an injury is incurred. Pre-employment drug testing was a common practice for the insurers.² Others discussed job descriptions, safety analyses, on-the-job training, supervision, hazard recognition, and employee access to safety training and access to safety data, such as Material Safety Data Sheets (MSDS) associated with mandatory OSHA Hazard Communication programs. Some insurers investigate the process of application, interview, health screening, background checks and selection of employees. A documentation review relating to training and disciplinary policies of the insured employers was also listed as an item of interest by a few respondents.

Management – Safety Organization – Written safety programs that address the hazards in the workplace were of interest to the responding insurers. The establishment of an appropriate safety committee was also discussed by respondents. Training to address various safety subjects applicable to the employer’s facilities, as well as the frequency of the safety training were considered by the insurers as important information to provide to their underwriters. Further, the insurers indicated their interest in procedures developed for reporting claims, accident investigation and return- to-work (RTW) programs for their insured employers.

4. Do you offer regular safety audits to your WV insured employers? Are these audits utilized in determining whether to apply a credit or debit under scheduled rating?

² Generally, pre-employment drug tests are lawful and do not constitute a violation of public policy because there is a lesser expectation of privacy in the pre-employment relationship. See *Baughman v. Wal-Mart*, 215 W. Va. 45, 592 S.E.2d 824 (2006).

One respondent, FirstComp, does not provide regular safety audits to its WV customers. All other insurers provide safety audit support by request from the insured, or from the carriers' own underwriters.

Every survey response stated that, in addition to the results of safety audits, other considerations are involved in offering a debit or a credit under scheduled rating. A good example for these considerations was submitted by Chartis Casualty. They stated that "In general, the underwriter will consider any and all information available, including but not limited to, safety and loss control reports, recent loss runs, information learned in connection with the premium audit, information provided by the broker or insured as well as information from public sources such as the insured's website". A similar response was common among all the surveyed carriers.

5. Do you take into account whether an employer has a drug and/or alcohol testing program³ in determining whether to apply a credit or a debit under scheduled rating?

The answers for this question were mixed. Three insurers, Chubb Group, FirstComp and Travelers provided "no" as their response. Travelers further stated that "it is not one of the perimeters (sic?) of our proprietary plan". Erie stated "Yes, if they meet the eligibility criteria for a drug free workplace, Erie applies the 5% premium credit". The remainder of the insurers simply included drug and/or alcohol testing programs as another item of interest for the underwriters to review.

6. Do you take into account whether an insured employer has become certified by an International Safety Organization in determining whether to apply for a credit or debit under scheduled rating?

FirstComp, Erie and Travelers all answered "no" to this question. The Hartford stated: "Such certification will be reflected in the application of a schedule credit". The remainder confirmed that, as in the responses to the previous question regarding a drug and/or alcohol testing program (question #5), having this certification is but one item of interest for the underwriters to review.

7. How many WV insured employers regularly utilize the safety and loss programs and initiatives offered by you? What amount of premium dollar does this represent? What specific programs and incentives are most commonly used?

Responses on this topic varied greatly. Below is a summary of each carrier's response to this inquiry (note: "surveyed" in the context used below means audited for safety):

- Chartis Casualty responded that it has "approximately 800 insured employers (WC) representing about \$24 M in premium".
- Erie responded that "120 clients regularly utilized some or all of the safety programs". Erie estimated the premiums for these clients at "\$1,000,000".

³ In West Virginia, drug testing is permitted of employees only under certain circumstances. Specifically, it must be done on either a good faith suspicion that the subject employee is using drugs or when the job involves heightened safety concerns. See *Twigg v. Hercules*, 185 W. Va. 155, 406 S.E.2d 52 (1990), Syll. Pt. 2. Therefore, employers must comply with these standards in order to implement a lawful drug testing program.

- The Hartford responded that “in 2009 52 different employers were surveyed”. Their premium estimate submitted was “\$116,105”.
- ACE Group said “in 2009, a total of 42 surveys were conducted”. No premium dollar estimate was provided.
- BrickStreet responded that they “do not have a way to determine which policyholders utilize which services as a whole”.
- Zurich responded that “During 2009, Zurich provided services 189 times to 96 different customers involving 109 different customer locations”. They stated that this represents \$2,124,760 in premium dollars.
- Liberty Mutual said that “During 2009, 60 onsite consultations and 119 telephone consultations were provided to WV customers. These accounts represent approximately \$1.3M in premium”.
- Travelers Companies responded that it receives “few, if any, requests from WV WC policyholders to conduct on-site risk control surveys”. Travelers stated a premium range between “\$50,000 - \$1M” for its “middle market book of business”.
- FirstComp responded that “the number of employers and the amount of premium dollar can not be retrieved from our recordkeeping system”.
- The Chubb Group responded “Presently, we have 4 policyholders with locations in WV that are receiving ongoing loss control services for WC. These 4 policyholders represent approximately 50% of our WV manual (sic?) premium”.

The insurers’ responses as to specific programs most commonly used were more uniform. Ergonomic workstation assessments; lifting techniques; safety planning (including program assistance); personal protection equipment (PPE) use; slips, trips and falls minimization/elimination; drivers’ safety training; and accident investigation were all commonly discussed in the insurers’ responses.

8. *How many WV insured employers engage in the safety audit process offered by you? What amount of premium dollar does this represent?*

Responses on this topic varied greatly. Below is a summary of each carrier’s response to this inquiry (note: “surveyed” in the context used below means audited for safety):

- BrickStreet, Liberty Mutual and Zurich all responded that they do not keep track of the requested data. Travelers did not respond, leading to the assumption that it does not track this data either.
- The Hartford responded: “In 2009, 52 different employers were surveyed. The premium estimate was “\$116,105”.
- Erie responded: “There were 491 safety audit/surveys conducted in the past 12 months for WC insured employers by Erie. These surveys include (in most cases) a physical on-site visit of the working conditions or job site, review of management controls, existing safety programs in effect, claims review and recommendations for improvement”. The estimated premium for these clients was “\$2,400,000”.
- Chartis Casualty responded that in 2009, “194 employers used our services” and [Chartis Casualty] was paid [by these employers] “\$9M” in premiums.
- FirstComp responded: “On-site surveys were completed at 7 WV policyholders over the past year. This represents a total written premium of \$662,941”.

- Chubb Group responded: “In the past 12 months we have surveyed and provided loss control services to 12 different WV WC policyholders. These policyholders represent approximately 55% of our state manual (sic?) premium”.
- ACE responded that “in 2009 a total of 42 surveys were conducted. We do not track the premium dollars”.

9. *Generally speaking, how do your WV insured employers compare regarding effective use of safety and loss programs?*

Chartis Casualty seemed to provide the answer that best summarizes all the responses received: “WV insured employers are consistent with insured employers in other states regarding their use of safety and loss programs. Hartford stated: “On average there is no major difference in the way WV clients use our services, or handle their own safety & loss prevention issues”. Other responses asserted that this type of data is not tracked.

10. *Do you have any suggestions of what the State of West Virginia could do in order to encourage its employers to engage in more safety and loss programs and initiatives?*

Responses to this question varied greatly. Below is a summary of each carrier’s response to the inquiry:

- BrickStreet replied that, “Keeping an awareness of safety in front of employers is key”. Additionally, BrickStreet noted that “The more we can assist with raising (safety) awareness, we can collectively encourage or promote a safer workplace”.
- The Hartford responded: “The State Department of Labor may want to investigate more serious workplace injuries, in terms of corrective actions the employers should take to make sure that type of accident does not occur”.
- Travelers responded “It is too early to identify recommendations”.
- Erie Insurance responded that it would help if the State would “Educate the employers on the benefits of safety and how it can positively affect the premiums they are paying for their WC premiums”.
- Chartis Casualty responded by stating “WV may wish to consider rating plan and incentive programs offered in other states. For example, most states offer a Drug Free Workplace Program⁴ where an insured will receive credit for having a structured program in place. Another similar program is the Workplace Safety Program which provides a credit to employers that enroll in a state mandated program to enhance safety in the workplace (for example, see Pennsylvania’s Certified Safety Committee Credit Program)”.
- Zurich stated it would like the State to “Encourage employers to work with their insurance carriers to determine the most effective way to reduce losses since the insurance carrier is uniquely qualified to provide expert loss control advice and services, specific to the needs of each insured’s business”.

⁴ In order for WV to implement a mandatory drug free workplace program, a careful consideration of existing law on drug testing would have to be reviewed and adhered to. See footnotes 3 and 4.

Executive Summary

The survey results indicate that all workers' compensation (WC) carriers offer safety and loss control support to their West Virginia (WV) customers. Methods of support include on-site assistance, workplace safety audits, safety program reviews, training support and the development of new programs, telephone based consultation, video libraries, internet tools and the establishing of support units organized within the carriers' business.

All carriers indicated that they make safety and loss resources and personnel available to employers in West Virginia. Some make in-state personnel and resources available, while other only avail out-of-state resources.

The NCCI scheduled rating plan is employed by all but three insurers – ACE, Travelers and AIG -- who referred to debits and credits being determined based on the individual underwriter's assessment of risk rather than pursuant to the NCCI plan. In determining debits and credits, carriers cited the following: the adequacy of safety controls on the insured premises, access to medical facilities, appropriate use of personal protection equipment (PPE), safety training provided to the workforce, the vetting of applicants and the safety organization within the insured's organization, drug and alcohol testing programs,⁵ being certified by an international standard organization.

Regular safety audits are provided to the insured workplace on request by the customer or their insurer's underwriter. Only one insurer does not provide regular safety audits to their WV customers.

The survey responses did not indicate any specific problems or issues with West Virginia employers that were anomalistic when compared to other states. Suggestions for how the State may encourage its employers to engage in more safety and loss programs and initiatives varied. Suggestions included looking at programs that exist in other states, such as state mandated drug-free workplace programs and programs whereby the state educates employers as to the importance of safety. Other carriers responded that they had not been in West Virginia's market long enough to identify specific ways to improve workplace safety in WV.

III. Summary of Workers' Compensation Self-insured Employer Safety Survey

Below is a summary of the responses received from West Virginia's self-insured employers. Ninety-six (96) of the ninety-eight (98) active⁶ self-insured employers responded. The survey had nineteen (19) questions, many of them multi-part.

- 1. Do you have a written safety and loss program for your employees, including provisions for any particular problems associated with the business (such as dust or noise)? What are the major components that the program addresses? Please list the top 3 to 5 programs in place to achieve compliance with the program.***

⁵ West Virginia has a progeny of case law that applies to drug testing which must be adhered to when implementing drug testing programs. See footnotes 3 and 4.

⁶ "Active" self-insured employers are all employers with ongoing employment operations in West Virginia who have been approved by the OIC to self-insure their workers' compensation risk.

The survey returns indicate all self-insured employers have a written safety program. This response is expected, as having such a program is a prerequisite to becoming a self-insured employer in West Virginia.

The survey returns indicate that the various hazards associated with a “heavy industry” (for example manufacturing, construction, and mining) have program elements that address potential hazards beyond those typically encountered by “light industry” (for example retail or food service) employees. In addition, the medical facilities responding to the survey indicated specific, detailed program elements dealing with the proper handling and disposal of blood-borne and other common pathogens present in their workplace.

Generally, those self-insured employers with potential dust or noise exposure have program elements that provide for their employees’ hearing conservation, eye protection and respiratory protection, as the case may be. The responses also indicate that periodic training and fit testing are provided to WV employees in order to minimize ongoing exposures to respiratory hazards within the self-insured workplaces. This training forum is valuable because it informs the employee of the proper fit and use of personal protection equipment (PPE). Generally, this would include the appropriate use of “dust masks”, or the use of HEPA and various other filters in cartridge type (half-mask) respirators. Such training can present, in a “hands on” fashion, the proper use and maintenance of self-contained breathing apparatus (SCBA, or “air packs” as well as the emergency “self-rescue” breathing apparatuses used in mining).

When considering the top three to five program elements, ergonomic considerations ranked highly. This may be due to the composition of the self-insured employers’ WV business activity. Specifically, FedEx, UPS and other businesses dealing with the transportation and distribution of goods are well-represented among the self-insured employers in WV. Ergonomics, particularly safe lifting techniques, and driver safety were recurring themes encountered during the review for this group.

The heavy industry group frequently utilized the lock-out/tag-out program element (for control of energy supply to machines). Forklift safety and other specialty machine operations were also repeatedly listed. Hazard Communication and trip and slip hazards in the workplace were other common topics mentioned by heavy industry employers.

The near omission of a few basic elements of safety programs is a concern. For example, mention was made in only a few survey returns dealing with fire or electrical safety in the workplace. Other noteworthy omitted elements include ladder and sling inspection and safety practices, scaffold safety, trenching/excavation safety issues and fall protection/fall arrest issues.

2. Is the written safety and loss program enforced, and if so how?

All-self insured employers responded that an enforcement component is present in their written programs. Specifics varied from “human resources disciplinary procedures” to “facility disciplinary processes”. Many survey returns reflected a “three strikes and you’re out” policy, meaning after three infractions, the violator is terminated from employment. Other employers, especially in mining, stated that they deal with infractions on a case-by-case basis.

3. *Are the guiding principles of the safety and loss program posted on a bulletin board and/or at other conspicuous places at the worksite?*

Most of the self-insured WV employers provided a “yes” response to this question. Several pointed to internal programs that make specific supervisors responsible for the posting of safety materials in their areas of authority. A few employers responded “no” to this question.

4. *Does senior management meet at least once annually to review the safety and loss program and systems/programs for its compliance to ensure the program is effective, sustainable and continually improving?*

All survey respondents stated that a safety and loss program review by senior management occurred at the very minimum on an annual basis.

5. *Do you have a written policy regarding drug and alcohol testing?⁷ If so please describe this policy.*

Except for a few self-insured employers in the food service industry who do not require drug testing, almost all self-insured employers in WV require a pre-employment drug test.⁸ Testing above and beyond the hire-in period is reported to be typical. Random testing is performed by most employers and post-accident testing is in most cases mandatory. Reasonable suspicion also represents a factor which triggers drug testing for many self-insured employers. Several employers have adopted DOT drug testing guidelines, especially those involved in cartage.

6. *Are there incentives provided to management and employees for reviewing and implementing the safety and loss program? If so, please explain what those incentives are.*

Generally, the responses indicate no significant incentives provided to management. However, as one employer stated “accident prevention is a part of loss prevention and management’s responsibilities. Loss prevention management has accident reduction as an item on their annual review.” As such, this may be considered as an incentive for safety, regarding both amplitude and frequency of occupational illness and injuries in the workplace during annual review.

As to employees, some self-insured employers provide a “Thank You” program. They simply send a card or note thanking the employee for his or her safety performance on the job. Other employers allow the “Thank You” notes to accumulate, and then a gift certificate is rewarded to those who have accumulated enough “Thank You” notes. Other employers, typically in heavy industries, offer a gift certificate as a reward for safe workplace performance. Some self-insured employers provide cook-outs, mugs, key chains and other safety oriented materials to reward safe work by employees.

⁷ Self-insured employers must adhere to established standards in West Virginia law regarding drug testing, which limit it to certain circumstances. See footnotes 3 and 4.

⁸ Pre-employment drug testing is not considered to be violative of public policy in WV, as there is a lower expectation of privacy in the pre-employment relationship. See footnote 3.

7. Do you have a progressive discipline policy in place to address violations of the safety and loss program?

A number of survey responses indicate no policy is in place to specifically address safety and loss control violations in the self-insured workplaces. Several refer to “violations of company policy” as a bridge to disciplinary action by offending employees. However, as noted in the responses to question #2, many expressed a “three strikes and you’re out” policy. Other employers, especially in mining, stated that they deal with safety infractions on a case by case basis.

8. Do you have a safety committee at the workplace which meets regularly?

Almost all self-insured employers reported having a safety committee that meets at least monthly. One employer reported having a “safety marshal” that polices safety behavior and reports his or her observations at monthly meetings. Only a few self-insured employers – mostly retail employers -- answered “no” to this question.

The composition of these safety committees is a potential concern. Specifically, during on-site safety audits for new SI applicants, the OIC has encountered “safety committees” that were comprised of management only or would have a “token” worker on the committee. Ideally, both management and labor should be well-represented in these committees.

9. Do you have at least one full-time employee dedicated solely to oversight of your work’s safety program?

The responses from self-insured employers were mixed. Some said yes, but stated that it was the “manager on duty” that concerned themselves with occupational safety issues. This is probably not an employee “dedicated solely to oversight of the safety program”. Several self-insured employers answered “yes,” but qualified their answer, stating that they were responsible for safety for their organization within a specific geographic region. Other employers, mostly heavy industry, answered with an unqualified “yes.”

10. Has a safety survey been completed for each work area and each area evaluated for occupational safety? How often are such surveys conducted and/or updated? Once the surveys are completed, is there a protocol for addressing issues reflected in the surveys? If so, what is the protocol?

All self-insured employers responded that safety audits are completed for each work area and that there is a protocol in place that assists in addressing the hazards identified in the work area survey.

Frequency of these inspections and the means in which they are addressed varied greatly. Retail facilities responded that they provide for a bi-monthly review. Manufacturers stated they have a one-time work area review. Other employers responded that they have “periodic” reviews. Many stated the frequency of review to be at least annual, while others stated that reviews are performed “as needed”. One employer (in cartage) stated that a review takes place every 3 years. There was no common time line for work area safety audits concerning the self-insured employers.

The standard frequency for work area safety audits in manufacturing and light industry is annual or in the event of a change of personnel, procedure or in the work area itself, within the annual review period.

The protocols for addressing issues reflected in the surveys also varied greatly. Some manufacturers, expected the auditors to address observed hazards during the work area audit. If the auditors were unable to make the correction safely on the spot, a work order for the appropriate repair will be submitted to maintenance. Retail and food services typically assign the responsibility for hazard elimination or minimization to the manager of the facility. Other organizations provide the information gained from work area analysis to be submitted to a safety committee for action. All employers described a means by which identified hazards were addressed within the self-insured workplace.

- 11. *Do you have a written return-to-work (RTW) program (i.e., restricted, modified or light duty work) complete with a RTW manager at each facility? If so, please describe. Is the written RTW program actively utilized by management and employees? What procedures are in place to ensure it is utilized?***

The response to this question provided a fractured picture for review. The majority, but not all of the employers responded that they have a written RTW program. The majority of those not having a written RTW program, stated that they provide for “light duty” work for injured workers. A few employers in heavy industry qualified that “light duty” is not often utilized at their respective facilities, but noted that they do what is determined to be best while working with the injured employee’s physician in order to return the employee to his or her job as soon as practical following an occupational illness or injury. Further, a few employers stated that they have a “90 days maximum” for “light duty” positions.

Little uniformity exists between RTW programs. Most of the survey returns indicate that both management and employees participate in their respective employer’s RTW or “light duty” programs.

Few employers stated that they have a dedicated RTW manager at each site. Some employers responded that RTW oversight was provided by committee, while others stated they have a “regional” manager for their RTW program. Some workplaces, usually smaller organizations, responded that the site manager bore responsibility for RTW overview.

- 12. *Are there incentives provided to management and employees for reviewing and implementing the RTW program? If so, please explain what those incentives are.***

The responses indicate that there are no incentives offered by self-insured employers for participation in RTW programs. However, the responses did indicate a “secondary” incentive. Specifically, several employers noted that workers participating in a RTW “transitional period” to their regular jobs are not counted in productivity reports to management. Additionally, to paraphrase one employer, “There is a positive impact for the affected individual and their co-workers when the affected individual returns to work”.

- 13. *Do you provide training (both initial training and retraining) for employees, including management, participating in job activities involving potential workplace hazards? Does this training include training regarding all workplace hazards applicable to the industry, including but not limited to, working with machines, proper ergonomics, proper physical***

techniques (such as lifting), ingress and egress to the facility, emergency preparedness and violence in the workplace? Is all training mandatory? Are written manuals used? If so please describe. Please describe the type and length of retraining of current employees. (For example, distinguish between classroom training and on-the-job training with direct supervision). Does the retraining address all workplace hazards applicable to the industry? State the various hazards addressed in such retraining.

All respondents stated that safety training, both initial and on-going, is offered and is mandatory for all employees. Mining responses indicate that 40 hours of classroom training is required by new hires. The responses reflect that typically there is a period of time following “hiring in” that a new employee is closely supervised and if safety protocols taught in training are not properly followed, the employee is either re-trained or terminated depending upon the safety infraction. This time period for the new employee was found to range from sixty (60) days to six (6) months.

The type of training and the duration varied widely. Several employers indicated that not all training is applicable to all employees. As the result, employees are limited in their utility within the workplace (unable to safely work other jobs within the business). Other employers stated that they cross-train employees so that they will be able to safely work various jobs at the business. These situations apply to both heavy and light industries. There is no recognizable trend among respondents for the initial training of their employees. Time frames for initial training or retraining of the experienced employees ranged from two (2) to eight (8) hours. Annual training periods for current employees seem to be the rule.

Computer-based safety training, customized for the various occupations of the self-insured employees, is mentioned frequently by the respondents. The use of DVD in training new employees was also a frequent response. This type of training requires the employee to write the answers to questions on a paper which is turned in at the end of the training session. These answer sheets are typically retained by the employer as proof of attendance.

Several survey respondents point to on-the-job safety training with a supervisor or trainer. According to the survey results, this type of safety training is limited in both time and scope. Further, proprietary training manuals are utilized by several respondents, designed for training of their employees. Additionally, the use of training aids (examples include gas cylinders, body harnesses, respirators, etc.) were mentioned by several self-insured employers.

Certain safety subjects require mandatory annual employee training (per OSHA CFR). Such general industry (both light and heavy) topics include, but are not limited to, hazard communication, hazardous materials training, hearing conservation, respiratory protection, lock-out/tag-out (for energy control), fall protection and blood-borne pathogen protection. Other industrial situations may include annual training requirements on subjects such as welding and cutting, ergonomics (including “lift safety”), the handling of compressed gasses, electrical safety, machine operations (including proper guarding of moving parts) and confined space training. Mining industries (per MSHA regulations), include the above training but also includes ventilation, roof support and training for the safe use of the specialized equipment used in production and transport. Another training topic in mining is self-rescue (including barricading and the use of underground “retreats”), involving specialized gear used typically in mining operations only.

14. Do you provide appropriate personal protection equipment (PPE) to employees who have the potential for exposure to a workplace hazard? If so, is there a system in place for regular inspection by management to ensure the equipment is properly utilized?

PPE is to be supplied by the employer for the employees' use at no cost to the employee per OSHA CFR.

The responses by light industries to the survey were mixed. The survey results indicate little to no PPE is required in the office environment. However, there is always potential for blood-borne pathogen infection in every workplace. OSHA CFR requires that PPE be provided in the response materials associated with blood-borne pathogen clean-up and disinfection. Additionally, while no other personal protection gear is required in the office situation, other hazards may be present. An example of such a hazard would be the improper loading of cabinets, possibly leading to "caught between" incidents caused by the toppling of a filing or storage cabinet possibly leading to broken bones, lacerations, contusions and/or suffocation. The potential for slips, trips and falls is another example of hazards observed in the office environment during on-site safety audits for self-insured status applicants.

The hazards found in the food service and retail industries require PPE be provided to the employees who are potentially exposed to hazards within the workplace. Examples of the potential hazards include, but are not limited to, the use of cutlery, exposure to hot surfaces and workplace ergonomic issues. The food service industry (as are most general industries), is always concerned with slips, trips and falls. These PPE issues were reflected in most light industry survey returns. Most respondents stated that monthly safety checks for PPE integrity and proper use by the employees, were performed in most cases by the safety committee members or by management. Weekly and/or monthly reviews are cited by WV's self insured employers as the most common inspection frequency.

Aside from mining, the survey results for heavy industries all indicate that PPE and the appropriate training for the correct use of the PPE, are utilized. Weekly review was mentioned as the most common frequency for safety inspections.

Mining survey returns indicate that reviews of equipment and current conditions in working areas of the mine are performed at the change of each shift, with other safety inspection items occurring at different time intervals. Examples of these items include respirable dust sampling and noise sampling. The results of these tests, as well as other observations in each work area, determine the PPE required by the workers.

The sampling for the composition of gasses within the mine is reported to be an on-going activity. Many machines employed underground are equipped with a gas monitoring cut-off control. When methane levels reach a certain level, or if oxygen levels in the atmosphere in the working area fall dangerously low, the machines simply shut off automatically. Explosive levels of methane, as well as other gasses that displace the oxygen partial pressures in the atmosphere within the working environment were observed in the responses as concerns in the mining industry.

15. Do you provide appropriate access and egress to the facility, including proper emergency lighting? If so, is there a system in place for regular inspection by management to ensure the access, egress and lighting is properly maintained?

All self-insured employers answered “yes” to this item, and stated that a system was in place to inspect and maintain the emergency lighting system. Nearly all self-insured employers responded that emergency lighting (including access and egress) is inspected monthly and maintained as required. The inspectors were typically members of a safety committee or a safety professional working for management.

The OIC’s experience has been that an appropriate amount or complete lack of emergency lighting has not been an issue among self-insured employers. Specifically, on-site safety audits for self-insured applicants have encountered only one situation that inoperative or inadequate lighting for access and egress was present.

A more common problem associated with ingress/egress issues is that an exterior door opens to the inside of the facility only. The outside door of any place of employment is to open to the outside of the building (per OSHA CFR). Further, the access or egress to a workplace in general industry, including both heavy and light, cannot be blocked, barricaded or locked while employees are located within the building. The OIC, during performance of on-site safety audits for self-insured applicants has observed, on occasion, the problem of an exterior door opening to the inside of a facility only. However, no responses received indicated anything but proper access and egress.

16. *Are the machines (including office equipment) properly inspected, guarded, maintained and operated? If so please describe the program in place to ensure that this occurs.*

All respondents answered “yes” to this question. That said, during the OIC’s on-site safety audits of self insured applicants, several areas of concern related to equipment and machinery in the workplace were observed and are worth noting.

The improper use of extension cords and the “daisy chaining” of “power strip” devices with multiple outlets is somewhat common for both heavy and light industries. Further, the use of extension cords rated for “household use only”, although improper, is quite common in the workplace. Typically these cords are light gauge, two-wire cords with multiple outlets. They do not provide for the use of a “ground plug” common on many electrically powered machines. The “power strip” devices usually have a circuit breaker built into the assembly. The use of these strips is permissible within the workplace, but the “daisy chaining” of these units together in order to make an extension cord (of sorts) is a common but prohibited activity.

The inspection programs for appropriate machine guarding vary in frequency according to the responses. Typically, the inspections are a function of the safety committee. However in other companies, a manager or safety professional periodically reviews the workplace in regard to machine guarding. Some self insured employers responded that they perform daily, pre-use inspections while others considered a weekly inspection interval as most effective. Respondents stated without exception that a means for the inspection of machine guarding is present.

17. *Is there a program in place to address emergency preparedness? If so, please describe.*

All respondents indicated that they have an emergency preparedness program for their employees’ protection. Answers ranged from a simple “yes” to companies listing exactly what constitutes an emergency situation. The latter included responses for spills, chemical

releases (in manufacturing), fires, bomb threats, and severe weather. Shelter in place was mentioned by a few employers (typically food services and retail). Evacuation was mentioned (and practiced) by other employers, typically in health care services. Some employers also list the means to contact support services such as police, fire fighters and other common emergency responders.

Larger employers engaged in manufacturing also responded that they train and provide for internal first response teams. Examples of this type of organization would include spill response or cleanup crews and confined space rescue teams.

Additionally, within the mining industry, responses included mine emergency response programs. These activities are analogous to the first responders within manufacturing.

18. *Have you been certified by an international standards organization?*

Only the respondents involved in manufacturing responded “yes” to this question with any frequency. However, international standards organization certification generally is not common outside of the manufacturing industry.

19. *Do you undergo any regular internal or external safety audits? Please explain.*

According to survey returns, all self-insured businesses undergo internal safety audits. Monthly safety audits represent the standard audit frequency. However, time intervals between inspections other than “in house inspections” were also discussed.

Several light industry members, particularly in the food industry, responded that external audits are completed quarterly by “higher management”. These obviously are not external audits.

Others stated that they have regular true external audits. Manufacturing examples include external audits by OSHA, insurance carrier safety specialists, Department of Homeland Security and the WV Division of Labor. Cartage-based businesses also undergo periodic inspections by US and WV Department of Transportation (DOT). Survey returns from coal operators stated that occasionally they retain an “independent third party” to perform an independent safety audit, reportedly in order to verify internal safety audit findings. Other self-insured employers stated that the only external safety audits completed are regulatory in nature.

A few of the large self-insured manufacturers are members of OSHA’s VPP Star Site, a designation awarded by OSHA for participating in a formal program that through time reduces lost-time and recordable accidents and injuries for their employees. As far as occupational safety and loss control is concerned, each of these VPP Star Sites represents industry leadership in regard to occupational safety and health programs and practices.

It is the opinion of the Industrial Council that external safety and loss audits by independent third parties are crucial to ensuring adequate quality and effectiveness of safety and loss programs. The responses did not indicate that most self-insured employers currently subjected themselves to such audits. This is viewed as a potential area of improvement.

Executive Summary

The survey results indicate that the West Virginia self-insured (SI) employers all provide a written safety plan for their employees. The elements within each program differ, according to the nature of the self-insured business. The safety program elements most commonly utilized were lockout/tagout, hazard communication, respiratory protection, hearing conservation, driver safety, blood borne pathogen (including spill clean-up) and the employees' use of appropriate personal protection equipment (PPE).

Safety program enforcement is provided by the SI employers. The survey results indicate that the SI employers' senior management reviews their safety and loss control programs at least annually.

Most SI employers surveyed have active safety committees. The work areas within the SI workplaces have been evaluated and the associated hazards identified. Reexamination of the work areas for associated hazards occurs periodically. Workplace safety audits, both internal (usually safety committee based) and external (by a regulatory agency) for hazard identification are performed. However, the surveys did not reflect that most self-insured employers subjected their operations to external audits by independent third parties. The Industrial Council believes that regular external audits of this type would be recommended in order to ensure quality and effectiveness of safety and loss programs. Corrections of identified hazards are accomplished by established procedures within the various SI employers' organizations.

Many WV SI employers utilize a formal return-to-work program for their injured employees. However, it is clear from the responses that some SI's do not have a meaningful return to work program.

Safety training is provided to the SI employers' workers. Training is accomplished by a mix of traditional classroom instruction, DVD presentations and computer based programs. SI employers provide appropriate PPE for their employees as required and training for the proper use of PPE is performed. Survey responses indicate that the moving parts of the SI employers' machines are properly guarded, preventing accidental contact. The survey responses indicate that WV SI employers have emergency preparedness programs for their employees' protection.

A few of the larger SI manufacturing concerns have international standards organization certification. Other SI employers, including construction and mining concerns, did not, which is to be expected because international standards organization certification is only common in manufacturing.

APPENDIX A



Scheduled Rating Credits and Debits by State* Policy Year 2009

State	Policies with Scheduled Rating			Statewide (All Policies)**		
	Average Credit Adjustment	Average Debit Adjustment	Overall Average Adjustment Debit (+) / Credit (-)	Average Credit Adjustment	Average Debit Adjustment	Overall Average Adjustment Debit (+) / Credit (-)
ALABAMA	21.3%	15.7%	-18.3%	8.5%	0.6%	-7.9%
ALASKA	26.9%	15.3%	-19.0%	6.8%	0.9%	-6.0%
ARIZONA	16.6%	12.6%	-15.1%	4.7%	0.2%	-4.5%
ARKANSAS	18.5%	14.3%	-13.4%	7.6%	1.1%	-6.5%
COLORADO	15.3%	8.2%	-10.3%	6.7%	1.0%	-5.8%
CONNECTICUT	19.2%	12.8%	-16.2%	9.2%	0.6%	-8.6%
DISTRICT OF COLUMBIA	19.7%	17.2%	-12.8%	7.1%	1.4%	-5.7%
GEORGIA	17.0%	13.1%	-13.5%	7.1%	0.7%	-6.4%
IDAHO	22.2%	18.4%	-19.9%	4.7%	0.2%	-4.5%
ILLINOIS	34.3%	18.0%	-30.7%	17.4%	0.7%	-16.7%
INDIANA	27.1%	21.0%	-23.1%	12.5%	0.9%	-11.6%
IOWA	12.9%	11.5%	-9.2%	5.9%	0.9%	-5.0%
KANSAS	8.5%	32.5%	-2.4%	0.0%	0.0%	0.0%
KENTUCKY	32.3%	25.3%	-27.9%	16.3%	1.0%	-15.2%
LOUISIANA	20.3%	17.4%	-15.5%	5.6%	0.7%	-4.9%
MAINE	16.7%	14.6%	-15.9%	7.4%	0.2%	-7.2%
MARYLAND	20.4%	14.6%	-16.8%	9.1%	0.7%	-8.3%
MISSISSIPPI	20.4%	15.0%	-16.3%	9.3%	0.9%	-8.5%
MISSOURI	18.9%	14.6%	-15.7%	9.0%	0.7%	-8.2%
MONTANA	22.0%	17.8%	-15.9%	8.8%	1.3%	-7.5%
NEBRASKA	22.8%	20.9%	-16.6%	1.8%	0.3%	-1.6%
NEVADA	20.5%	17.8%	-17.6%	10.3%	0.7%	-9.5%
NEW HAMPSHIRE	19.4%	13.7%	-17.7%	7.8%	0.3%	-7.5%
NEW MEXICO	11.9%	9.4%	-9.3%	4.3%	0.5%	-3.9%
NORTH CAROLINA	31.9%	17.7%	-29.2%	15.9%	0.5%	-15.4%
OKLAHOMA	19.5%	14.0%	-16.6%	7.2%	0.5%	-6.7%
OREGON	18.9%	13.7%	-13.8%	0.1%	0.0%	-0.1%
RHODE ISLAND	22.1%	16.5%	-18.8%	11.5%	0.8%	-10.7%
SOUTH CAROLINA	20.1%	14.5%	-16.8%	7.5%	0.6%	-6.9%
SOUTH DAKOTA	19.2%	17.1%	-15.0%	8.3%	1.0%	-7.4%
TENNESSEE	20.5%	15.7%	-17.4%	8.7%	0.6%	-8.0%
TEXAS	26.8%	21.1%	-23.8%	15.0%	0.8%	-14.2%
VERMONT	18.2%	17.1%	-15.0%	9.5%	0.9%	-8.6%
VIRGINIA	13.6%	11.3%	-11.0%	5.3%	0.5%	-4.8%
WEST VIRGINIA	17.8%	11.4%	-10.4%	7.2%	1.6%	-5.7%

* Based on unaudited premium data reported to NCCI at policy inception for policies written during 2009.

** Schedule rating adjustments reported divided by total estimated statewide premium (i.e., premium for policies without schedule rating adjustments is included).

Appendix B

Insurance Carrier Safety Study Responses*

Company	Number of WV Insureds	Safety and Loss Programs offered?	Safety Unit available?	NCCI scheduled rating plan used?	Drug-free workplace credit or debit offered?	ISO Certification credit or debit offered?	Regular safety audits offered? How many performed?
Chartis Casualty Company (AIG)	800	Yes	Yes	Yes	Yes	Yes	Yes 194 in 2009 131 in 2010
The Hartford Insurance Group	2853	Yes	Yes	Yes	Yes	Yes	When requested 52 in 2009
Brickstreet Mutual Insurance Company	23,000	Yes	Yes	Yes	Yes	Yes	Yes Specific number unknown
Liberty Mutual Insurance Group	Insurer requested that this information be kept confidential	Yes	Yes	Yes	Yes	Yes	Yes 60 onsite and 119 telephone consultations
Zurich American Insurance Company	392	Yes	No	Yes	Yes	Yes	Yes 189 in 2009
ACE Group of Insurance Companies	411	Yes	Yes	No	Yes	Yes	Yes 42 in 2009
Erie Insurance Group	1202	Yes	Yes	Yes	Yes	No	Yes 412 in past 12 months
The Travelers Companies, Inc.	1567	Yes	Yes	No	No	No	Yes About 1% of employers requested this type of service
FirstComp Insurance Company	690	Yes	No	Yes	No	No	No, performed with requested by the employer 7 in 2009
Chubb Group of Insurance Companies	262	Yes	Yes	Yes	Yes	Yes	Yes 12 in past 12 months

*Additional Information Made Available Upon Request

**CARRIERS/
CARTAGE/
TRANSPORT
&
DELIVERY**

CARRIERS / CARTAGE / TRANSPORT & DELIVERY

Sentinel Transportation, LLC

UPS

UPS Ground Freight, Inc.

FedEx SmartPost

Federal Express Corporation (d/b/a, "FedEx Express")

FedEx Ground and FedEx Home Delivery

Self-Insured Employers Safety Study Carriers/Cartage/Transport & Delivery

Company	Sentinel Transportation, LLC	UPS	UPS Ground Freight, INC	FedEx SmartPost	Federal Express Corporation (d/b/a, "FedEx Express)	FedEX Ground and FedEx Home Delivery
Approximate Number of WV Employees	36 Employees	1073 Employees	90 Employees	192 Employees	277 Employees (as of 3/31/2010)	78 Employees
Is there a Written Safety and Loss Program for Employees in Place?	Yes	Yes, the UPS Comprehensive Health & Safety Process (CHSP)	Yes	Yes, FedEx Ground and FedEx Home Delivery have Workright and Dock Safety	Yes	Yes, FedEx Ground and FedEx Home Delivery have Workright and Dock Safety
Major Components of the Program	Sentinel safety principles and policies, safety procedures and precautions, proper PPE, reporting of safety hazards, reporting and investigation of safety failures, consequences of non-compliance, safety recognition programs, etc.	Personal Value, Management Commitment & Employee Involvement, Worksite Analysis, Hazard Prevention and Control and Safety Education and Training	Safety Committees and Employee Involvement; Recognition (Personal Behavior); Training and Demonstrations; Incident Investigation and Follow-up; Unannounced Observations; Worksite Analysis; and Defensive Driving	Workright is a program that consists of four modules. 1. Awareness, Presentation, Body Movement, Athleticism, Slips and Falls, Injury Prevention, Control, and Stop and Think. 2. Safety Observation Review 3. Safety Guidelines 4. Stretch Program designed specifically for FedEx employees All FedEx Ground employees are required to watch the dock Safety Video BCSA - Business Control Self Assessment. This is a program to ensure compliance through the performance of internal audits	FedEx Express has an extensive safety program consisting of safety awareness, training, health and wellness, accident injury/investigation and reporting, facility safety inspection and recordkeeping	Workright is a program that consists of four modules. 1. Awareness, Presentation, Body Movement, Athleticism, Slips and Falls, Injury Prevention, Control, and Stop and Think. 2. Safety Observation Review 3. Safety Guidelines 4. Stretch Program designed specifically for FedEx employees All FedEx Ground employees are required to watch the dock Safety Video BCSA - Business Control Self Assessment. This is a program to ensure compliance through the performance of internal audits
Top 3 to 5 Programs in Place to Achieve Compliance	1. Injury Prevention 2. Safe Driving 3. Chemical Safety 4. Hazardous Materials Safety 5. Fatigue Management	1. Hazardous Communication Program 2. Personal Protection Equipment Program 3. Respirator Protection Program 4. Hearing Protection Program	See Above	See Above	See previous response.	See Above

Company	Sentinel Transportation, LLC	UPS	UPS Ground Freight, INC	FedEx SmartPost	Federal Express Corporation (d/b/a, "FedEx Express)	FedEX Ground and FedEx Home Delivery
Is the Written Safety Program Enforced?	Safety procedure violations are addressed with discipline. Failure to follow safety procedures and policies is the largest category of terminations in the company	Yes through Internal UPS Comprehensive Self Evaluations, local safety Quicklook audits and Corporate CSE audits through and outside agency named Keter Consultants	There is a formal process for corrective action for individuals and audits for each operation	Yes, the employee safety guidelines documents states the requirements to comply with federal, state and company safety requirements. FedEx management has responsibility of enforcing safety program and violations of basic safety methods requires management action and as necessary disciplinary action up to and including termination	FedEx Express has the appropriate training and programs in place necessary to promote safety among its employees	Yes, the employee safety guidelines documents states the requirements to comply with federal, state and company safety requirements. FedEx management has responsibility of enforcing safety program and violations of basic safety methods requires management action and as necessary disciplinary action up to and including termination
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes	Yes, they are located on CHSP safety boards and safety tips are posted and distributed in designated safety areas	Yes	Yes, the safety policy is posted in the FedEx SmartPost Hubs to reflect both Management and workforce responsibilities for safety	Yes	Yes
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes	Yes, Senior Management meets monthly to review programs	Yes, monthly	Yes	Yes	Yes
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes, includes pre-employment, random, for cause and post safety failure	Yes, there is a Random Drug Pool for CDL, UPS Reasonable Cause testing, UPS Fitness for Duty Protocol, Pre-Employment and Post Accident testing	Yes, employees are covered by collective bargaining and company policies	Yes, there is a written policy that addresses required drug testing for salaried non-exempt and exempt employees including random drug testing where permitted by law	Yes, FedEx Express has a federally approved alcohol and drug-testing program	Yes, there is a written policy that addresses required drug testing for salaried non-exempt and exempt employees including random drug testing where permitted by law

Company	Sentinel Transportation, LLC	UPS	UPS Ground Freight, INC	FedEx SmartPost	Federal Express Corporation (d/b/a, "FedEx Express)	FedEX Ground and FedEx Home Delivery
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	Safety performance is a conditions of continued employment. All managers receive a variable compensation component that is heavily weighted to the safety performance of the company and their business segment. All hourly employees receive a variable compensation component that is heavily weighted to the safety performance of the company and their business segment. All hourly employees receive a variable compensation award that grows with each successive safe year.	Yes, there are numerous recognition programs including the UPS Circle of Honor Program, UPS Mechanic Safety Program and daily, weekly and monthly recognition programs as well	Yes, each management person has safety indices in their performance review	No, the safety program is a requirement. Additionally, FedEx SmartPost locations recognize and celebrate achievement of safety goals with cook-outs and similar activities	FedEx Express has the appropriate training and programs in place necessary to promote safety among its employees including a wide variety of safety incentive programs. Local management and field safety specialists may conduct their own programs, contests, incentives etc so these are not identical throughout the company	No, the safety program is a requirement. Additionally, FXG and HD locations recognize and celebrate achievement of safety goals with cook-outs and similar activities
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	Yes, See Above	Yes, all discipline is handled through the Collective Bargaining Agreement that includes safety training, procedures and methods	Yes, as well as collective bargaining agreements	Yes	Yes	Yes
Do you have Safety Committees at the Workplace that Meet Regularly?	Yes	Yes, each UPS operation has a CHSP safety committee that meets at least monthly	Yes, monthly at a minimum	Yes, Safety Committees are made up of managers and dock workers that meet once a month	Yes	Yes, Safety Committees are made up of managers and dock workers that meet once a month
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes	Yes, there are 2 manages, the District Health and Safety Manager and the District CHSP Manager, along with numerous other full-time safety personnel	Yes	Currently, PGH Safety overlooks all safety programs	Yes, FedEx Express Corporate Safety Department oversees the company's safety program	FXG and HD have assigned safety professionals for their Regions/Districts to support and ensure Safety Program compliance.

Company	Sentinel Transportation, LLC	UPS	UPS Ground Freight, INC	FedEx SmartPost	Federal Express Corporation (d/b/a, "FedEx Express)	FedEX Ground and FedEx Home Delivery
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Complete safety and environmental assessment is completed every three years	Yes, UPS analyzes safety historical data yearly and occupational safety observations are performed at a minimum monthly for each work area. Facility audits are conducted yearly and update the Concern Logs as needed.	Every Six Months	Yes, the Post Facility Inspection Report is completed once every quarter	Yes, FedEx has the appropriate training and programs in place necessary to promote safety among its employees and routinely reviews operations and practices to ensure continue compliance with all applicable occupational safety and health regulations	Yes, the Facility Inspection Report is completed once every quarter
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	Action items are added to a tracking list at headquarters and resolved	The occupational safety observations are reviewed with the workforce the day following the survey. Any possible safety at risk items are documented and abated on the concern logs. Appreciative/Constructive feedback is given directly to the employees observed immediately	Yes, unannounced external audits	There is an abatement list on the last page of the form that is completed	See previous response.	There is an abatement list on the last page of the form that is completed
Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?	Have ADA job descriptions and treating physician forms that allow the medical professional to stipulate what light duty tasks can be safely performed by injured employees. Terminal managers coordinate light duty with the contracted medical clinic at their location	Yes, as detailed in the UPS Injured Employee Procedure and Collective Bargaining Agreements. The UPS Temporary Alternate Work program is utilized as a means to assist injured employees to return to work in a gradual capacity. The Business Manager at each facility is directly involved. UPS also utilizes RTW tools from the WV RTW Kit, that was suggested years ago by the state's Loss Prevention branch.	Yes, they work with employees and medical providers to identify Temporary Alternate Work which is tracked, ranked and rated	Yes, there is a transitional RTW process that is intended to provide injured employees temporary meaningful work and to assist in the healing process	Yes and it is utilized through communications and training	Yes, there is a transitional RTW process that is intended to provide injured employees temporary meaningful work and to assist in the healing process

Company	Sentinel Transportation, LLC	UPS	UPS Ground Freight, INC	FedEx SmartPost	Federal Express Corporation (d/b/a, "FedEx Express)	FedEX Ground and FedEx Home Delivery
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	Terminal and Regional Operations Managers are help accountable for costs of workers' compensation payments, sick pay and light duty pay	UPS "BEAR"- this is an internal cost accounting feature that creates incentive for Managers to return injured works back to work by using hypothetical charges called "BEAR" dollars. If an injured worker remains out of work totally, the internal charge is higher than if an injured worker was on Light Duty.	Yes, it is a metric used in performance evaluations	Yes, workers on transitional RTW are not counted in productivity numbers	FedEx Express has the appropriate training and programs in place necessary to promote safety among its employees	Yes, workers on transitional RTW are not counted in productivity numbers
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	Yes	Yes	Yes	Yes	FedEx Express has an extensive safety program consisting of safety awareness, training, health and wellness, accident injury/investigation and reporting, facility safety inspection and recordkeeping	Yes
Is All Training Mandatory?	Yes	Yes	Yes	Yes	Yes	Yes
Are Written Manuals Used? If so, Please Describe.	Written safety-training manuals include a general manual, commercial driver manual, shop safety manual, product specific safety manuals. This is supplemented by interactive computer based training and regular classroom and hands on safety-training meetings	Yes, the UPS Designated Responder program, Hazardous Communication Program, Lockout and Conveyor Securing Program, Damaged Materials Program, Crisis Management Program, Safe Work Methods Program, etc.	Yes, Haz-Com, Lockout, PPE, Respiratory, Safe Work Methods, Defensive Driving, and Emergency Response Plan	Training is accomplished through video, manuals and online instruction	Depends on the job position	Training is accomplished through video, manuals and online instruction

Company	Sentinel Transportation, LLC	UPS	UPS Ground Freight, INC	FedEx SmartPost	Federal Express Corporation (d/b/a, "FedEx Express)	FedEX Ground and FedEx Home Delivery
Please Describe the Type and Length of Initial Training to New Employees	Length of training depends on level of previous experience. Generally the classroom and interactive computer training will take most of the first week of working. Operators handling high hazard products may undergo classroom training of an additional week and supervised hands-on training for two to six additional weeks.	All new employees receive an extensive blend of both classroom and hands on training for their first six weeks. The training stresses the importance of proper safe work methods, hazardous material training, powered equipment training and conveyor securing.	Employees go through a month long training process facilitated by a mentor that addresses compliance requirements and specific workplace hazards. The training is both classroom and hands on.	Employees go through an orientation process. Pre-employment includes a dock tour, code of conduct and employee information packet. Day one consists of Dock Safety training, hazardous communication and injury reporting procedures. All other training is received as needed and documented	FedEx Express has the appropriate training and programs in place necessary to promote safety among its employees	Employees go through an orientation process. Pre-employment includes a dock tour, code of conduct and employee information packet. Day one consists of Dock Safety training, hazardous communication and injury reporting procedures. All other training is received as needed and documented
Please Describe the Type and Length of Initial Training to Current Employees	Regular mandatory safety-training meetings plus a refresher of interactive computer training modules make up annual classroom and supervised hands-on refresher training.	Retraining consists of a minimum of 1 hour classroom training and one day work with management	Compliance requirements are addressed and follow up training is used periodically as a follow up	Retraining occurs in the form of monthly structured safety meetings. The topics are usually required by Corporate, OSHA and/or DOT.	See previous response.	Retraining occurs in the form of monthly structured safety meetings. The topics are usually required by Corporate, OSHA and/or DOT.
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Yes	Yes, monthly inspections of SCBA units, monthly emergency lighting and monthly extinguisher inspections	Yes, it is part of the work site analysis and assessment	Yes, additionally, PPE assessments are performed to determine if there is a need for particular PPE, then it is provided to the employee	FedEx Express complies with all applicable occupational safety regulations regarding PPE	Yes, additionally, PPE assessments are performed to determine if there is a need for particular PPE, then it is provided to the employee
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes	Yes, regular inspections are monthly emergency lighting, internal UPS CSE audits, UPS yard procedures protocol and annual egress training.	Yes, it is part of the work site analysis and assessment	Yes	FedEx Express complies with all applicable occupational safety regulations regarding access, egress and lighting	Yes

Company	Sentinel Transportation, LLC	UPS	UPS Ground Freight, INC	FedEx SmartPost	Federal Express Corporation (d/b/a, "FedEx Express)	FedEX Ground and FedEx Home Delivery
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	All vehicles, pumps, compressors, blowers, etc. are inspected daily by the operators prior and at the end of each use and periodically as part of a routine preventive maintenance program. Any defects discovered are resolved or equipment is taken out of service.	Yes, UPS conveyor Securing and Guarding inspections are completed twice daily.	Yes, it is part of the work site analysis and assessment	Yes	FedEx Express complies with all applicable occupational safety regulations regarding machine guarding, etc.	Yes
Is there a Program in Place to Address Emergency Preparedness?	Written emergency response program is updated annually and employees participate in drills to address various emergency scenarios. There is also a written security plan.	Yes	Yes, it is part of the work site analysis and assessment. Drills are conducted periodically	Yes	Yes	Yes
Have you Been Certified by an International Standards Organization?	No	UPS has numerous safety programs that exceed the ISO standards	No	Yes	N/A	Yes
Do you Undergo any Regular Internal or External Safety Audits?	Managers and supervisors review driving behavior audit reports and equipment inspection forms daily. US and state DOT enforcement agents stop and inspect trucks on the roadside over 1000 times per year and document results that must be reviewed and acknowledged by managers and supervisors. Customers audit employee safety practices whenever Sentinel is operating on their property. Comprehensive safety and compliance audits are performed at lease once every three years.	Yes, UPS conducts internal CSE audits performed by region and district Health and Safety auditors. Additionally, Keter Consultants perform external safety audits	Yes, there is an audit process consistent with Sarbanes Oxley protocols	Yes, every department, Hub, satellite is subject to an internal audit. These internal audits are performed on a monthly basis and based on compliance with established safety procedures	Internal and external audits are performed however all information concerning internal and any external audit is confidential and proprietary to FedEx Express and would have to b obtained from the applicable agency or entity conducting the audit.	Yes, every department, Hub, satellite is subject to an internal audit. These internal audits are performed on a monthly basis and based on compliance with established safety procedures
Contact Person	Rick Preston Sentinel Transportation, LLC	Steve Katch UPS Mid Atlantic Safety Manager	Todd Bradon UPS Ground Freight, INC	Riley Milligan FedEx SmartPost	Federal Express Corporation	Michael Evers FedEx Ground and FedEx Home Delivery

HOTELS/ INNS/ RESORTS

HOTELS / INNS / RESORTS

Marriott Int. & Residence Inn by Marriott

The Greenbrier

Snowshoe Mountain, Inc.

Self-Insured Employers Safety Study

Hotels/Inns/Resorts

Company	Marriott Int. & Residence Inn by Marriott	The Greenbrier	Snowshoe Mountain, Inc.
Approximate Number of WV Employees	190 employees	1200 employees	1300 seasonal; 400-500 year round
Is there a Written Safety and Loss Program for Employees in Place?	Yes	Yes.	Yes.
Major Components of the Program	Dept. JSA's Lifting, wet floors, transporting heavy objects, driving, emergency procedures, basic safe work practices.	Emergency Action Plan, respiratory protection, hazardous energy, chemical control.	Not answered
Top 3 to 5 Programs in Place to Achieve Compliance	Bloodborne Pathogens; Lift; Lockout/Tagout	See above.	Not answered
Is the Written Safety Program Enforced?	Yes, 7 loss prevention officers; reports unsafe work habits and conditions to Hotel Management.	Yes.	Yes; weekly, monthly and annual reviews and bi-weekly walk through
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes.	Yes.	No. Intranet for employees.
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes. Monthly and yearly	Yes.	Yes.
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes, test all applicants prior to hiring.	Yes. Pre-employment.	Yes. Pre-employment and random testing.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	No.	Yes.--Recognition Certificate	No.
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	Yes.	Yes.	Yes.
Do you have Safety Committees at the Workplace that Meet Regularly?	Yes, quarterly	Yes.	Yes. Twice a month

Company	Marriott Int. & Residence Inn by Marriott	The Greenbrier	Snowshoe Mountain, Inc.
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes--7 LP Officers; 1 Chief of LP	no. Several individuals share those duties.	Yes.
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Yes Bi-monthly.	Yes every 2-3 years	No.
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	Yes Audits/inspection are given to Chief of LP and he addresses any issues	Review with affected personnel	Not answered
Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?	Yes, HR handles it; light duty utilization be rolling silver wear, answering phones, office tasks. Yes. HR monitors.	Yes, managed by the Director of Health and Medical. Program does not allow modified or light duty. Yes. Counseling and use of 3rd part workers compensation administrator.	Yes
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	No.	No.	No.
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	Yes.	Yes.	Yes
Is All Training Mandatory?	Yes.	Yes.	Yes.
Are Written Manuals Used? If so, Please Describe.	Yes.. Written out in the Marriot Job Safety Analysis.	Yes-Hotel Safety by Coastal Training	Yes.
Please Describe the Type and Length of Initial Training to New Employees	Associates go through an 8 hour orientation class then at least 1-4 weeks of training. Depending upon position.	Varies greatly, based on duties, hazards of specific department.	New Hire orientation
Please Describe the Type and Length of Initial Training to Current Employees	Yearly Bloodborne pathogens, etc. 2 hour courses.	Based on job duties/exposure; on the job, some classroom training.	Retraining orientation.

Company	Marriott Int. & Residence Inn by Marriott	The Greenbrier	Snowshoe Mountain, Inc.
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Yes, inspect for proper use.	Yes. Inspection is periodically conducted by management	Yes. Walk throughs
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes, Loss prevention does daily patrols	Yes.	Yes, walk throughs and system call Tiscor
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Yes, Eng. Has a monthly PM sheet and maintains all equipment.	Yes, Periodic inspection and routine maintenance.	Yes. Safety Committee makes sure that managers are getting the machines properly inspected.
Is there a Program in Place to Address Emergency Preparedness?	Yes. Quarterly fire drill.	Yes. Written Emergency Action Plan.	Yes, emergency preparedness plan.
Have you Been Certified by an International Standards Organization?	no.	No.	No.
Do you Undergo any Regular Internal or External Safety Audits?	Yes. Bi-monthly safety audit. Bi-yearly inspection and owners conduct a yearly fire/safety inspection.	Yes. Periodic Internal audits are performed as well as occasional external audits.	Annually snowshoe has external safety audits completed by insurance company.
Contact Person	Kenneth D. King Marriot Int. & Residence Inn by Marriot	E.S. Hanger, Jr. The Greenbrier	Lori Warner Snowshoe Mountain, Inc

INSURERS

INSURERS

TAB 1:

Chartis Casualty Company (AIG)

The Hartford Insurance Group

BrickStreet Mutual Insurance Company

Liberty Mutual Insurance Group

Zurich American Insurance Company

TAB 2:

ACE Group of Insurance Companies

Erie Insurance Group

The Travelers Companies, Inc.

FirstComp Insurance Company (FCIC)

Chubb Group of Insurance Companies

INSURERS - TAB 1

Insurers Safety Study

Company	Chartis Casualty Company (AIG)	The Hartford Insurance Group	BrickStreet Mutual Insurance Company	Liberty Mutual Insurance Group	Zurich American Insurance Company
Approximate number of WV insureds	In 2009, Chartis wrote 800 workers' compensation policies	2853 WV workers compensation policies	Approximately 23,000	Insurer requested this information be kept confidential	392 insureds
Approximate amount of WV workers compensation premium dollar	Chartis reported a combine earned written premium in 2009 for WC of just over \$24 million	The WV premiums on these policies is \$6,370,121	Approximately \$270,000,000	\$8.15 Mil	\$6,167,886.00
Are safety and loss programs and initiatives offered to WV insured employers?	Chartis provides a full range of safety and loss programs including risk assessments, industrial hygiene and industrial health services, training, accident analysis of casual injury factors and other appropriate services including safety videos, literature and internet-based Global Loss Prevention Inc.'s Risk Tool System for loss prevention management	Yes, a wide variety of loss prevention services, tailored to the needs of the client and to underwriting requirements is offered. These services might include safety committee training, property loss prevention, ergonomic loss prevention or industrial hygiene consulting services	Yes, a wide array of safety and loss services are offered. From onsite to web based, including an extensive safety video library is available to all active policyholders. Assistance is provided with the development of safety programs, return to work programs, accident investigation, industrial hygiene and ergonomic services. A variety of formalized training is provided including OSHA 10 and OSHA 30 hour construction and general industry, as well as National Safety Council certified defensive driving courses. Specialized training is also provided in proper lifting techniques, for lift training and healthcare related training. Online services are also provided through the Safety Source program	Yes, the following loss control services are available to WV insureds: 1. Loss Control Resource Catalog - safety video/ DVD rentals, literature, signs, posters, etc. 2. SafetyNet Website - resource support available through customer portal 3. Training Seminars and Webinars 4. Onsite Loss Control Advisory Services 5. Toll-Free Technical Support line - Loss Control Consulting Center	Zurich offers safety and loss control support to WV employers via on-site visits, telephone consultation, Webinars and E-tools. The type and extent of support provided typically depends on coverage provided and customer needs.

Company	Chartis Casualty Company (AIG)	The Hartford Insurance Group	BrickStreet Mutual Insurance Company	Liberty Mutual Insurance Group	Zurich American Insurance Company
<p>Is there a unit dedicated solely to safety and loss whose services are offered to WV insured employers?</p>	<p>Chartis provides safety and loss control services to WV employer via Global Loss Prevent, Inc., a Chartis company providing risk engineering services in Property, Casualty, Environment, Transportation, Construction and Healthcare</p>	<p>There is a dedicated Loss Prevention Organization. The northern portion of WV is serviced by the PA loss control team while the southern portion is serviced by the VA loss control team. There are usually half a dozen representatives from both offices who may visit a WV client</p>	<p>BrickStreet employs a staff of 17 full time Safety Specialists dedicated to providing safety services to policyholders, one of which is an Industrial Hygienist. They are OSHA certified trainers and most hold advanced degrees such as ARM, CSHM, CIH, and CSP</p>	<p>The Loss Control Advisory Services structure utilizes Service Directors that are assigned to oversee the services provided by field consultants to customers in WV</p>	<p>No</p>
<p>What criteria is used to determine whether to offer debits or credits to a WV employer pursuant to the NCCI scheduled rating plan? Please specify for each of the following categories in the scheduled rating plan:</p> <ol style="list-style-type: none"> 1. Premises 2. Medical facilities 3. Safety devices 4. Employees - selection, training, supervision 5. Management - safety organization 	<p>Underwriters rely upon a multitude of subjective criteria when evaluating whether and to what extent they will offer debits or credits when underwriting an account. In general, the underwrite will consider any and all information learned in connection with the premium audit, information provided by the broker or insured as well as information from public sources such as the insured's website. The underwriters are not restricted to specific criteria, rather they are guided by the principles of schedule rating. The underwrite will consider specific and verifiable information that necessitates adjustment of the pricing of the risk due to risk characteristics which are not reflected in the experience modification</p>	<ol style="list-style-type: none"> 1. Premises - Housekeeping, condition of equipment, emergency evacuation routes, ventilation, lighting and type of structure 2. Medical Facilities - Access to emergency medical facilities nearby or onsite 3. Safety Devices - Material handling equipment, formalized lockout tagout program in place, machine guarding, personal protective devices available, utilized and maintained 4. Employees (selection, training, supervision) - Formalized employee selection procedures, employee turnover, employee supervision and use of leased employees 5. Management (safety organization) - Formalized accident investigation program, formalized safety committee and formalized return to work programs 	<p>BrickStreet utilizes an analysis of the policyholders premises condition care and upkeep, whether there are medical facilities on site, or nearby, any safety systems the policyholder may have to mitigate injury such as "lock-out tag-out" procedures, PPE being provided, if the environment is safe from debris, noise or other hazards, if the employees are properly trained, if there is pre-employment drug screening or other pre employment initiatives to ensure properly qualified and trained employees, if they are properly supervised and expected to maintain a safe attitude and work environment, if the company management is committed to providing and encouraging a safe work environment, if there is a formal safety program, RTW program and other safety initiatives in place and are they effective. This is not a comprehensive list of the criteria which go into the schedule rating analysis as there are many more items specific to particular industries which factor into the review</p>	<ol style="list-style-type: none"> 1. Premises - Access physical conditions, workplace design and workflow. Rate on a relative scale of good to poor 2. Medical facilities - Evaluate proximity to facilities, availability of on-site first aid. Rate on a scale of good to poor 3. Safety devices - Assess availability of appropriate PPE, enforcement of usage, safety devices appropriate for operations, controls for manual material handling exposure. Rate on a scale of good to poor 4. Employee (selection, training, supervision) - Evaluate company criteria and adherence to it. Rate on scale of good to poor 5. Management (safety organization) - Evaluate management commitment, enforcement, disaster planning, timely reporting and recordkeeping. Rate on scale of good to poor 	<p>All answers are "relative to other risks in the same classification"</p> <ol style="list-style-type: none"> 1. Premises - How effectively are hazards controlled on the premises 2. Medical facilities - Are employees trained and have available the appropriate equipment to handle emergencies; utilization of managed care concepts 3. Effectiveness and appropriateness of machinery and safety equipment 4. Employees (selection, training supervision) - Does the employer have a program where they select, train and retain employees who are most likely to avoid injuries and return to work if they do have an injury 5. Management (safety organization) - Effectiveness of safety and return-to-work programs and active management involvement in these programs

Company	Chartis Casualty Company (AIG)	The Hartford Insurance Group	BrickStreet Mutual Insurance Company	Liberty Mutual Insurance Group	Zurich American Insurance Company
Are regular safety audits offered to WV insured employers? Are these audits utilized in determining whether to apply a credit or debit under scheduled rating?	Regular on-site safety audits are provided based on underwriting and insured requests and specific service plans and areas of emphasis are determined jointly with insured	The Loss Control Organization only visits clients at the direction of underwriters and agents. Direct client requests for service are always vetted through the underwriting department. Loss control surveys are utilized, when available, in evaluating risk and determining appropriate schedule rating amounts	BrickStreet Safety Specialists provide on-site inspections, RTW programs, safety programs, accident investigations, industrial hygiene evaluations and ergonomic services, all of which may help the underwriter in their determination of schedule rating	Yes, this could be initiated by the WV insured or Liberty Mutual Underwriting	Safety audits are provided to some policyholders. Audits are less likely done when the policyholder is relatively small, is in a non-hazardous classification or has a favorable loss experience. Application of schedule rating factors is determined during the underwriting process. Schedule rating factors are influenced by the results of a safety audit
Is it taken into account whether an employer has a drug and alcohol testing program in determining whether to apply a credit or debit under scheduled rating?	Since there is currently no Drug Free Workplace Credit rating program in place in WV, underwriters are free to take an employer's drug and alcohol testing program into account when considering application of credit or debit schedule modification	In jurisdictions where a drug and alcohol testing credit is not available, such a program will be reflected in the application of a schedule credit	Drug and alcohol testing is taken into account however, in combination with the overall risk characteristics looking at all of the schedule rating criteria as a whole	Yes	The existence of an effective drug or alcohol testing program is considered in determining the appropriate schedule rating factor
Is it taken into account whether an insured employer has become certified by an International Safety Organization (ISO) in determining whether to apply a credit or debit under scheduled rating?	An individual underwriter may consider an insured's ISO certification when determining whether to apply schedule rating modification. However, there is no guideline in place for underwriters to assign specific schedule rating criterion based on an insured's ISO certification or lack thereof	Such certification is reflected in the application of a schedule credit	Yes, again with the overall risk characteristics looking at all of the schedule rating criteria as a whole	Yes	Yes, however the most credible information is provided by risk engineering reports/on-site inspections
How many WV insured employers regularly utilize the safety and loss programs and initiatives offered? What amount of premium dollar does this represent?	Chartis has approximately 800 insured employers representing \$24 million in premium.	In 2009, 52 different employers were surveyed. The average account written in WV multiplied by the 52 accounts surveyed results in a total premium estimate of \$116,105	All policyholders have access to safety services, however there is to a way to determine which policy holders utilize which services as a whole.	60 onsite consultations and 119 telephone consultations were provided to WV customers. These accounts represent approximately \$1.3 mil in premium.	In 2009, Zurich provided services 189 times to 96 different customers involving 109 different customer locations. These numbers do not include Zurich customers serviced by outside services (i.e. captive programs). This resulted in \$2,124,760

Company	Chartis Casualty Company (AIG)	The Hartford Insurance Group	BrickStreet Mutual Insurance Company	Liberty Mutual Insurance Group	Zurich American Insurance Company
What specific program and initiative is most commonly utilized?	The most commonly utilized service offering is the GLP Risk Tool System	Ergonomic workstation assessments and lifting techniques, safety planning, slip/trips and falls and accident investigations are the most common	On-site visits, video library, web based material and training programs are most commonly used	The toll-free telephonic consulting center is popular with policyholders to provide a quick solution to a problem. Support with compliance questions are common requests.	On-site visits, loss evaluation, training/guidance is most common
How many WV insured employers engage in the safety audit process offered? What amount of premium dollar does this represent?	2009 - 194 employers/ \$9M in premium 2010 - 131 employers/ \$7M in premium	In 2009, 52 different employers were surveyed. The average account written in WV multiplied by the 52 accounts surveyed results in a total premium estimate of \$116,105	Do not have this specific data	Data not available	This data is not tracked
Generally speaking, how do WV insured employers compare regarding effective use of safety and loss programs?	WV insured employers are consistent with insured employers in other states regarding their use of safety and loss programs	On average there is no major difference in the way WV clients use services or handle their own safety and loss prevention issues	It is the sense of BrickStreet that those employers who are focused on safety and who utilize their safety services generally have a safer workplace	Data not available	This data is not tracked
Any suggestions of what WV could do in order to encourage its employers to engage in more safety and loss programs and initiatives?	WV may wish to consider rating plan and incentive programs offered in other states. For example, most states offer a Drug Free Workplace Program where an insured will receive credit for having a structured program in place. Another similar program is the Workplace Safety Program which provides a credit to employers that enroll in a state mandated program to enhance safety in the workplace. The experience rating plan could be adjusted by something like the mandatory All Risk Adjustment Program used in MA to apply an additional surcharge on top of any experience modification debit and using that increased revenue to reduce rates for all other employers	The State Department of Labor may want to investigate more serious workplace injuries, in terms of corrective actions the employers should take to make sure that type of accident does not reoccur	Although the OIC website is informative, possibly including links or other useful information of state sponsored initiatives employers could utilize under the workers compensation tab of the website might be helpful. Keeping awareness of safety in front of employers is the key. Most employers are focused on their business and insurance is not generally their expertise. Therefore the more assistance with helping raise awareness hopefully will collectively encourage or promote a safer workplace	Remind employers to network with their insurance provider for assistance with loss control support	Encourage employers to work with their insurance carriers to determine the most effective way to reduce losses since the insurance carrier is uniquely qualified to provide expert loss control advice and services, specific to the needs of each insured's business
Contact Person	Melissa Kerns Chartis Casualty Company	Jeff Behem and Karyn Gross Loss Control Field Managers The Hartford Financial Services Group	Ken Howard Director of Underwriting Operations BrickStreet Mutual Insurance Company	Robert Mindock Operations Support Manager Liberty Mutual Group	Donna Durham Zurich American Insurance Company

INSURERS - TAB 2

Insurers Safety Study Continued					
Company	ACE Group of Insurance Companies	Erie Insurance Group	The Travelers Companies, INC	FirstComp Insurance Company (FCIC)	Chubb Group of Insurance Companies
Approximate number of WV insureds	411 insureds	1202 insureds	1567 workers compensation policyholders currently in WV. This includes all writing companies owed and/or managed by The Travelers Companies, INC	690 insureds	262 policies
Approximate amount of WV workers compensation premium dollar	\$17,190,585.00	\$4,215,536.00	Currently have \$12,677,620 in workers compensation written premium in WV	\$2,525,994.99	\$2,317,713.00

Company	ACE Group of Insurance Companies	Erie Insurance Group	The Travelers Companies, INC	FirstComp Insurance Company (FCIC)	Chubb Group of Insurance Companies
<p>Are safety and loss programs and initiatives offered to WV insured employers?</p>	<p>All ACE policyholders have access to the resources of Global Risk Control Services unit of ACE. GRCS provides an array of accident prevention services to the policyholders. The services included but not limited to are, on-site, Ergonomic, industrial hygiene surveys, environmental assessments, loss trend and causal analyses, etc.</p>	<p>Dedicated team of ERIE employees offer customized service with on-site consultation to identify, evaluate and control hazards that could lead to accidents. Customized service plans to establish risk management objectives with training activities aimed at achieving objectives. Loss evaluation to identify root cause of accidents; accident investigation and on-line and instructor lead safety programs provided at no cost to clients</p>	<p>Travelers Risk Control Division offers a variety of safety and loss control services to WV policyholders. A website is offered with over 1500 safety and health related resources and tools. There is also an AIHA accredited Industrial Hygiene laboratory. Safety and Health training services, on-site surveys, consultations, Industrial Hygiene testing/monitoring, ergonomic assessments and training, post injury management assistance, safety newsletters for customers and many other services are offered. Also, Travelers has alliances with many vendors that provide safety and health services and products, that are available to policyholders</p>	<p>Pursuant to the Managing General Agent agreement, FirstComp Underwriters Group, INC. is the servicing entity for FirstComp Insurance Company and provides these services on behalf of FCIC. Safety programs and other safety materials are available regardless of premium size or class and includes: sample safety programs; materials to evaluate and comply with OSHA; safety video library; over 200 toolbox safety meeting sheets; self-inspection checklists; assistance with development of RTW; claims development; drug-free workplace guidance and other similar programs. On-site assessments within the state are completed by a third party, Insurance and Safety Services (ISS), who receives assignments from the FirstComp loss control department. Personnel from the FirstComp loss control department are also available by telephone or e-mail to assist with any questions that insured's may have in the continued development of their safety and health programs</p>	<p>Yes, Loss Control Services division is available to assist policyholders with their accident prevention programs. Available services can include the following services as merited: Workers compensation risk management reviews; accident investigation training for supervisors; ergonomic risk assessment and program consultation; industrial hygiene services; workers compensation loss analysis; access to safety and health fact sheets; safety program assessment and consultation; safety training resources</p>
<p>Is there a unit dedicated solely to safety and loss whose services are offered to WV insured employers?</p>	<p>GRCS is staffed with 100+ highly technical and qualified consultants and a network of 500+ affiliates providing loss prevention services in all 50 US States plus Europe, Asia and the rest of the world. The consultants are domiciled throughout the country and service policyholders. Based on the service need of the WV policyholder, a competent consultant provides the services</p>	<p>ERIE Employees dedicated to loss control: Two senior loss control consultants located in WV and two in Pennsylvania and one Maryland senior loss control consultants to handle the northern and eastern panhandle areas of the state. One Industrial Hygienist on staff for consultation. Two rehabilitation nurses licensed for WV to monitor medical treatment of severe claims</p>	<p>Yes, Travelers Risk Control Division is the department dedicated to assisting in the prevention of losses to policyholders. Currently there are approximately 762 employees in the Risk Control Department. There are two Risk Control Consultants located in WV and have other consultants and specialists in surrounding areas that can provide additional services to WV policyholders when needed</p>	<p>No</p>	<p>Loss Control Services division provides WV policyholders with requested and appropriate services. At this time there is not any LCS staff stationed in WV. The Pittsburg office services WV policyholders</p>

Company	ACE Group of Insurance Companies	Erie Insurance Group	The Travelers Companies, INC	FirstComp Insurance Company (FCIC)	Chubb Group of Insurance Companies
<p>What criteria is used to determine whether to offer debits or credits to a WV employer pursuant to the NCCI scheduled rating plan? Please specify for each of the following categories in the scheduled rating plan:</p> <ol style="list-style-type: none"> 1. Premises 2. Medical facilities 3. Safety devices 4. Employees - selection, training, supervision 5. Management - safety organization 	<p>No set criteria has been established. The debits or credits are determined based on the individual underwriter's assessment of the risk</p>	<ol style="list-style-type: none"> 1. Premises - working environment; ventilation equipment, condition of equipment 2. Medical facilities - availability of medical facilities within reasonable distance; trained employees for first response; emergency procedures in place 3. Safety devices - as required by industry; fall protection program/equipment/training; PPE provided and employees trained in use; machine guarding; lockout/tag out program as required 4. Employees (selection, training, supervision) - Applications; apprentice program; skilled or unskilled labor; ratio of employees to supervisor/manager; turnover rates of labor 5. Management (safety organization) - Management supportive and engaged in safety program and efforts; work rules in place and enforced. Claims promptly reported; cooperative with claims handling and RTW programs 	<p>Travelers has filed and gained approval for a proprietary schedule rating product. Since the NCCI plan is not used, a response cannot be given</p>	<ol style="list-style-type: none"> 1. Premises - Is the location suitable for the occupancy; does it expose employees to unusual or unexpected hazards; is housekeeping and maintenance appropriate 2. Medical facilities - Are appropriate emergency medical services available to the business operation; employees trained in first aid/CPR; first aid supplies/kits properly supplied and readily available 3. Safety devices - Is appropriate PPE available, properly used and maintained; if machinery is operated have appropriate guards or other devices been installed and used; are appropriate maintenance procedures followed 4. Employees (selection, training, supervision) - application and selection process; formal orientation and training program; supervisors experienced and readily available; documentation for employee training; disciplinary procedures; all operations properly supervised 5. Management (safety organization) - Is there a written safety program that address hazards that the employee are exposed; are regular safety meetings conducted; is there a safety committee; is required training completed based on the scope of operations; have procedures been developed for reporting claims, accident investigation and assisting injured employees in the RTW 	<ol style="list-style-type: none"> 1. Premises - The adequacy of the premises for its current use, protection systems such as sprinklers or fire detection, life safety systems, fire doors and walls, etc. 2. Medical facilities - access to emergency rooms, hospitals, trauma centers and EMTs, availability of occupational or other physicians in the area 3. Safety devices - engineering and protection controls such as machine guarding, enclosure of robotic equipment, ventilation systems, proximity sensors 4. Employees (selection, training, supervision) - Job descriptions and safety analyses, on the job training, supervision, hazard analysis and employee access to safety training and safety data such as Hazard Communication data 5. Management (safety organizations) - Formal and informal methods a company uses to manage employee safety and health as evidenced by safety committees, accident investigations, safety and health policies, safety incentive and recognition programs, job safety analysis, employee safety observations

Company	ACE Group of Insurance Companies	Erie Insurance Group	The Travelers Companies, INC	FirstComp Insurance Company (FCIC)	Chubb Group of Insurance Companies
<p>Are regular safety audits offered to WV insured employers? Are these audits utilized in determining whether to apply a credit or debit under scheduled rating?</p>	<p>All ACE policyholders have access to the resources of Global Risk Control Services unit of ACE. GRCS provides an array of accident prevention services to the policyholders.</p>	<p>All current and proposed workers' compensation clients have availability to loss control safety audits at no charge. Results of these safety surveys/audits are used by underwriting staff in determining credits or debits</p>	<p>Loss control surveys are provided to WV insureds. A notice is sent to all Travelers WV workers compensation policyholders in their initial and renewal policy packages that describes the Risk Control services to insureds. The notice is also found on the Risk Control customer website. Information used for schedule rating comes from a variety of sources, one of which may be the internal Risk Control surveys. The internal Risk Control services are also used to determine insurability based on underwriting guidelines</p>	<p>No</p>	<p>LCS risk engineers conduct initial "underwriting surveys" which is designed to identify the most common hazards of the employer and assess the level and adequacy of controls. Based on the size, type and loss experience, the underwriter may order a loss control survey. Not every account submitted is surveyed. The survey report comments on the safety program, practices and policies of the company as well as the loss history. The loss control report as well as other information from the producer or policyholder provides support for the underwriter's actions</p>
<p>Is it taken into account whether an employer has a drug and alcohol testing program in determining whether to apply a credit or debit under scheduled rating?</p>	<p>This would be determined by the underwriter's analysis of drug and/or alcohol plan as presented by the policyholder</p>	<p>Yes, if they meet the eligibility criteria for a drug free workplace, ERIE applies the 5% premium credit</p>	<p>No, it is not one of the perimeters of the proprietary plan</p>	<p>No</p>	<p>The loss control report includes the topic of drug and alcohol prevention and testing programs. If an employer instituted a program, it is asked about the basis for the program and how it is managed. If such a program exists and follows state and/or federal guidelines then it is reported to the underwriter who can factor it into their rating process. It is not required of policyholders to institute a Drug Free Workplace program</p>
<p>Is it taken into account whether an insured employer has become certified by an International Safety Organization (ISO) in determining whether to apply a credit or debit under scheduled rating?</p>	<p>This determination would be included in the underwriter's analysis of risk and add support to the amount of schedule rating applied</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>A policyholder is not required to become certified. If a policy holder has an ISO certified management program it is noted in the report. ISO certifications for quality, environment, information security and OHSAS certification reflect well on employers.</p>

Company	ACE Group of Insurance Companies	Erie Insurance Group	The Travelers Companies, INC	FirstComp Insurance Company (FCIC)	Chubb Group of Insurance Companies
How many WV insured employers regularly utilize the safety and loss programs and initiatives offered? What amount of premium dollar does this represent?	In 2009, 42 surveys were conducted	Approximately 120 clients regularly utilized some or all of the safety programs. The estimated premium for these clients is approximately \$1,000,000.	Travelers is currently tracking usage of three of their major areas of risk control services that are provided to insureds. Records indicate that only 1 workers' compensation policyholder has accessed the Risk Control website to date. As for life Safety Academy class, 13 different policyholders attended one or more of the five classes that have been held in WV. 3 policyholders attended webinars. While the Risk Control services provided at the request of insureds is below 1% of total premium, Travelers does conduct many on-site risk control surveys at the request of the underwriting department.	WV employers are provided safety and health materials/programs on a regular basis either through their agent or direct contact with insured management or employees. Written records of these contacts are made in each account file but the number of employers and amount of premium dollar can not be retrieved from the recordkeeping system.	Presently there are 4 policyholders with locations in WV that are receiving ongoing loss control services for workers compensation. These 4 policyholders would represent approximately 50% of the WV manual premium
What specific program and initiative is most commonly utilized?	Onsite, industrial hygiene and environmental surveys were most utilized	Fall protection; safety program development; compliance with OSHA regulations; drivers safety training; and PPE use most common	See Above	Sample safety programs, training materials and safety video information are most common	Loss Control Services
How many WV insured employers engage in the safety audit process offered? What amount of premium dollar does this represent?	See answer above. The services are rendered on a "need" basis. Premium dollars are not tracked	There were 491 safety audit/surveys conducted in the past 12 months for workers' compensation insured employers by ERIE. These surveys include in most cases a physical on site visit of the working conditions or job site, review of management controls, existing safety programs in effect, claims review and recommendations for improvement. Estimated premium for these clients \$2,400,000	See Above	Onsite surveys were completed at 7 WV policyholders over the past year. This represents a total written premium of \$662,941	In the past 12 months, 12 different WV workers compensation policyholders have been surveyed and provided with loss control services. These policyholders would represent approximately 55% of the premium

Company	ACE Group of Insurance Companies	Erie Insurance Group	The Travelers Companies, INC	FirstComp Insurance Company (FCIC)	Chubb Group of Insurance Companies
Generally speaking, how do WV insured employers compare regarding effective use of safety and loss programs	Utilization of the loss prevention services in WV is approximately the same as in other states	Oral and written recommendations are provided to clients which are followed up by loss control consultants within 60-90 days to get a progress report and offer additional assistance. The loss control services are offered to all clients, regardless of size and many of the small businesses take advantage of the services	According to the Risk Control management team responsible for WV, there are 3 areas that seem to be receiving more questions and/or making more recommendations with respect to WV workers compensation policyholders vs. workers compensation policyholders in other states. These include: 1. Return to Work/Post Injury Management Issues 2. Formalization of safety and health programs (many programs are not in formal, written format) 3. Understanding the importance of safety and risk control and the affects they can have on their insurance	The employers assisted in WV compare favorable regarding their safety and health programs with those in the other 30 states where FirstComp provides coverage. The main business focus is small and medium sized businesses, which typically have the desire to create a safe workplace but lack the knowledge or resources to develop specific plans. The resources that were identified previously are readily available to assist	There is no evidence that indicates that WV employers are more or less likely to utilize loss control services. WV producers and policyholders have access to the same level of loss control services as customers in all other states
Any suggestions of what WV could do in order to encourage its employers to engage in more safety and loss programs and initiatives?	None	Educate the employers on the benefits of safety and how it can positively affect the premiums they are paying for their workers' compensation premiums	None	A number of states offer premium credits or incentives for the development and verification of various safety and health programs including: safety committees, a drug-free workplace, and safety programs that meet specific guidelines; these programs not only encourage safety and health development but may have a significant effect on the frequency and severity of accidents	Having access to state agency websites for safety and health guidance. When this information is free and provides checklists, training and hazard assessment resources, it gets utilized. Also, seminars and workshops hosted by state labor, workers compensation or health and safety agencies are beneficial.
Contact Person	Steve Kreider ACE Group of Insurance Companies	Joyce West Erie Insurance Group	Not Answered	Kim Coonrod Loss Control Manager FirstComp Insurance Company	Mike Heembrock Loss Control Services Chubb Group Ins. Co.

MANUFACTURING

MANUFACTURING

TAB 1:

Severstal Wheeling, Inc.

Royal Vendors, Inc.

Huntington Alloys Corporation

Ball Metal Food Container Corp.

TAB 2:

General Motors, LLC

The Homer Laughlin China Co.

Columbia West Virginia Corporation

Century Aluminum of WV, Inc.

JELD-WEN, Inc.

PPG Industries, Natrium WV Facility

TAB 3:

E. I. DuPont de Nemours & Company, Washington Works

Goodrich Corporation

Guardian Fiberglass

Toyota Motor Manufacturing, West Virginia

Alliant Techsystems, Inc.

TAB 4:

Pepsi Beverage Company

Kingsford Manufacturing Company

SWVA, Inc.

MANUFACTURING - TAB 1

Self-Insured Employers Safety Study Manufacturing				
Company	Severstal Wheeling, Inc.	Royal Vendors, Inc.	Huntington Alloys Corporation	Ball Metal Food Container Corp.
Approximate Number of WV Employees	800 employees	300 employees		330 employees
Is there a Written Safety and Loss Program for Employees in Place?	Yes.	Yes.	Yes.	Ball has multiple written safety programs and tracks, on a monthly basis, the cost of workplace injuries.
Major Components of the Program	The safety and Loss Program includes multiple provisions for problems associated with business.	Lockout/Tagout; Bloodborne Pathogen; respiratory; Hazardous communication; hearing conservation; powered industrial truck	Lockout Tag Out Confined Space, Haz Comm, PPE, Hearing Conservation, Fire Prevention, Emergency Preparedness, Respiratory Protection, Fall Protection, Mobile Equipment Hand Safety.	The safety program primarily focuses on ensuring the plant safety programs comply with Occupational Health and Safety Administration requirements. The programs include the specific compliance requirements and assigns responsibility for compliance with the various programs.

Company	Severstal Wheeling, Inc.	Royal Vendors, Inc.	Huntington Alloys Corporation	Ball Metal Food Container Corp.
<p>Top 3 to 5 Programs in Place to Achieve Compliance</p>	<p>a. Noise Studies to determine hearing conservation programs. B. Quarterly air monitoring to determine the amount of benzene soluble fraction of total particulate matter on the coke oven batteries. C. Annual benzene monitoring in the By-Products Area. D. Asbestos and lead monitoring programs.</p>	<p>1. Respiratory Protection (Prevent potentially harmful exposures to airborne contaminants); 2. Hearing Conservation (comply with OSHA); 3. Hazardous communication (to protect health of employees, to provide employees with the necessary information, complying with OSHA).</p>	<p>Lockout Tag out- addresses proper procedures for attaining zero energy state for equipment This addresses electrical, mechanical, hydraulic, pneumatic, and stored energy. Hearing Conservation- addresses proper engineering, environmental, and PPE controls to address noise in the workplace. This addresses Occupational Hearing Loss. Confined Space- addresses proper procedures for entry into a confined space. Includes hazard mitigation, hazard awareness, proper sampling, and permitting. This program addresses confined space entry hazards.</p>	<p>Ball has approximately 18 programs which have specific applicability to Ball operations. The following programs are the programs most critical to our ability to minimize the potential for injury. Machine guarding — The program outlines specific machine guarding requirements and/or establishes alternative procedures which allow employees to work safely on manufacturing equipment. The programs defines what hazards must be guarded. Over the last five years, Ball has dedicated substantial resources to meet the guarding requirements as established in the ANSI B-II standard which requires the installation of interlocking devices which shut the machine down in the event a guard is opened while the equipment is running.</p> <ul style="list-style-type: none"> • Lockout/tagout — The program outlines specific requirements for deenergizing equipment so as to eliminate the potential for accidental equipment start-up and/or potential energy that could remain after equipment is shut-off. • Hazard Communication — The program seeks to educate personnel on the specific hazards associated with the chemistry used in the manufacturing process. As required by OSHA, employees have 24 hour access to material safety data sheets. • Personal Protective Equipment — This program defines what PPE is required in the plant. Typically, PPE requirements include; hearing protection, eye protections, cut resistant gloves, cut resistant sleeves and steel toed shoes.

Company	Severstal Wheeling, Inc.	Royal Vendors, Inc.	Huntington Alloys Corporation	Ball Metal Food Container Corp.
Is the Written Safety Program Enforced?	Yes, training and discipline if necessary.	Yes, continuous observation and monitoring by team leads and upper management. Mandatory monthly reports/audits; random audits by safety managers.	Yes, progressive discipline	All Metal Food and Household plants have established Safety Rules." The Safety Rules define how discipline is to be administered in the event an employee violates one of the rules. Disciplinary actions can range from verbal warning to termination.
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes.	Yes	Yes.	The plant has a safety board containing; Days Away Rate/Total Recordable Rate, Injury Illness Summary, Corporate Safety Report Safety Committee members, Safety Committee Meeting minutes, Plant Managers letter on commitment to safety, Hearing Conservation Program, OSHA Log, Lead & Asbestos location survey and Awareness.
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes.	Yes	Yes, Monthly	Safety program status is reviewed monthly with senior management In addition to reviewing safety status, management reviews first aid, near misses and property damage incidents. The plant has also implemented a behavior-based safety program which focuses on monitoring and correcting behaviors that could lead to accidents.
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes. All employees are tested prior to employment, at return to work physicals, and annual mobile equipment operator's physicals. Employees are also tested if involved in serious incidents such as mobile equipment accidents.	Yes, all prospective employees must pass a post-offer drug screen as a condition. Additionally, policy states that drug test may be requested if there is reasonable cause to believe that employee is under the influence, a work-related accident occurs, or at random.	Yes, employees are tested due to reasonable suspicion whether it be an error in coordination or judgment could likely have contributed to an accident Also, if the company has reasonable good faith objective suspicion to believe the individual employee is under the influence of alcohol or drugs while in the workplace.	Yes. Ball has a drug and alcohol testing policy. Prior to employment, candidates are subject to drug and alcohol testing. Post employment, employees involved in recordable incidents are screened for drug and alcohol use.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	No.	No. Employees are required by policy to follow all safety procedures. Safety is the responsibility of all employees including all plant hourly and upper management personnel.	No.	No.

Company	Severstal Wheeling, Inc.	Royal Vendors, Inc.	Huntington Alloys Corporation	Ball Metal Food Container Corp.
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	Yes.	Yes	Yes.	All Metal Food and Household plants have established 'Safety Rules.' The Safety Rules define how discipline is to be administered in the event an employee violates one of the rules. Disciplinary actions can range from verbal warning to termination.
Do you have Safety Committees at the Workplace that Meet Regularly?	Each division has its own safety committee that meets at least monthly.	Although we do not have "safety committees," we do provide safety suggestion boxes in the plant to allow employees the ability to anonymously or otherwise offer suggestions. Additionally, we encourage an open-door policy that allows employees to communicate suggestions/concerns on a constant, ongoing basis.	Yes, weekly and monthly	Yes. The plant has monthly safety committee meeting. Minutes are posted for all employees to read and the names of committee members' are also posted.
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes.	Joint responsibility between HR and Operations Management.	No.	No. The plant has two human resource managers who are responsible for development and maintenance of the health and safety program.
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Safety audits are conducted at least monthly by the division safety committees and any safety issue are tracked until completed.	Yes, Daily, weekly and monthly audits	Yes, annually	Yes: The plant has completed Job Hazard Analysis for its machinery and equipment.
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	Yes. The program is part of the union management contract, and the company does have at least one employee that is tasked with overseeing this program.	The safety manager is to be notified immediately of any issues for immediate resolution.	Yes, action items are assigned and management must sign off they are completed and re-audited. Audited are reviewed in S,H, & E Steering committee meetings held monthly.	The survey is reviewed yearly by the HR Manager and review dates are noted on the survey.

Company	Severstal Wheeling, Inc.	Royal Vendors, Inc.	Huntington Alloys Corporation	Ball Metal Food Container Corp.
<p>Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?</p>	<p>The USW contract dictates the program.</p>	<p>Yes, injured employee is given paperwork to be submitted to the treating physician. Lthis paperwork includes a notice to the physician explaining we support an early RTW into transitional duty for all employees. We believe that the sooner an employee is returned into a supportive and safe work environment, the sooner the employee's recovery will be... if an employee is capable of doing any work at all, including less than a full day at work, we will attempt to provide transitional duty accommodations. It also includes "Medical Capabilities Form" that must be completed and approved by the manager in charge of safety before the employee returns to work. Employees are given work that accommodates all restrictions and made aware they are not to complete any work outside of their restrictions. The responsibility then lies with the empolyee to work within their restrictions. The team lead, the operations manager/s will monitor the employee to assure they are working within their restrictions and that hte employee is comfortable in doing so.</p>	<p>Yes, Modified Duty program is an agreement between company and employee that provides work for injured workers on a temporary basis(30 day Max) to transition them back to full duty. Yes, all employees on modified duty as well as safety and departmental management must sign off that they will abide by the restrictions imposed by the physician.</p>	<p>Yes. The company has a program whereby employees that are injured on the job can return to light or modified duty if the work is available, Responsibility for the return-to-work effort is the responsibility of the plant HR managers. The return-to-work program is actively utilized by management and employees. Quarterly, personnel at the corporate office meet to discuss the return-to-work status of employees who were injured on the job. This information is also reviewed by senior operations management to promote timely return to work.</p>
<p>Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?</p>	<p>Same as above.</p>	<p>Royal Vendors, Inc. has a clearly stated policy that working safely is a condition of employment. Our incentive is to keep our employees safe, and to prevent further aggravation of an injury.</p>	<p>Yes, employees receive full pay for returning to work under the modified duty program and management receives labor for job that are not historically bid in jobs.</p>	<p>No.</p>
<p>Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?</p>	<p>The company has a safety training program in place. The training begins with the new hire training program and continues throughout their career in the company. The company has a Job Safety Analysis (JSA) and a Lockout (LTP) program that trains the employee on specific jobs along with the use a pre-job assessment when JSA's/LTP have not been developed.</p>	<p>Yes.</p>	<p>Yes.</p>	<p>The initial and recurring training programs cover known workplace hazards. Employees are trained annually on machine guarding, emergency preparedness.</p>
<p>Is All Training Mandatory?</p>	<p>Yes.</p>	<p>Yes.</p>	<p>Yes.</p>	<p>Yes.</p>

Company	Severstal Wheeling, Inc.	Royal Vendors, Inc.	Huntington Alloys Corporation	Ball Metal Food Container Corp.
Are Written Manuals Used? If so, Please Describe.	Classroom training.	Various methods of delivery are used for presentation such as hand outs, Powerpoint, video and lecture.	Yes, Job Safety analysis, Work Center Manuals, and Departmental orientation training.	No.
Please Describe the Type and Length of Initial Training to New Employees	The initial hire training lasts a minimum of 8 hours depending on the job or division the employee(s) are assigned to. The training utilizes both classroom and on the job experiences. Workplace hazards, corporate safety policies/requirements, state/federal requirements, etc, are included in the safety training.	Employees are required to completed the following before entering the plant for duty: PowerPOint presentation, Review of policies regarding Equal Opportunity, Anti-Harassment & Discrimination, Jenvironmental Policy, Security, Safety and Health, Workplace Violence, Drug Testing, Production Work Rules, and written safety policies with signature of receipt and understanding. Address proper PPE, Forklift Safety, Machine Safeguarding, bloodborne Pathogens, proper lifting, hearing conservation, hazardous cmunication, jproper use of ladders, lockout tagout, fire/fire extinguishers, general safety hazards, reporting of incidents, accidents, and injuries. Checklist to be reviewed with respective team leads. Must initial each item as it is reviewed by the team lead, and if they are asked to initial an item that is not covered they are to refuse and notify the manager responsible for safety immediately. Join their team lead for a walk through of the plant and their area to review: primary and secondary escape routes, where to meet outside the building when evacuated, location of escape maps,location of MSDA book, its use and what chemicals they will be using, review of the Emergency Action PLan, DWI, issuance and training on PPE, which they must demonstrate, proper lifting, reiterate all injuries must be reported, sheet metal crane and hazard, identify and explain where and how to safely cross the assembly line. Takes approximately 3-4 hours.	Training usually is 5 days for labor force. This training includes 3 days classroom training and 2 days hands on safety training for fire, crane and fork truck. Class room training addresses all mandatory requirements under OSHA and additional industry specific hazards. After initial training employees are sent to their lob assignments where they learn the specific requirements of their job and all applicable work place hazard training for that department This training can be as little as one day up to six weeks. Supervisory training consists of 2-3 days dependent on area of responsibility. Includes all applicable OSHA required training as well as specific training concerning supervisory personnel.	New employees receive classroom and on-the job training. The training provided does address all the workplace hazards associated with the industry. Training on a particular job is typically hands-on.

Company	Severstal Wheeling, Inc.	Royal Vendors, Inc.	Huntington Alloys Corporation	Ball Metal Food Container Corp.
Please Describe the Type and Length of Initial Training to Current Employees	Same as above.	Employees are constantly monitored and trained on the job as needed. Trainings are mandatory. Variety of methods. Length and frequency of the program depends upon the topics covered. Required to retrain. Same types of training including First Aid/CPR, Emergency Procedures, etc.	Retraining is done on a monthly basis and covers all OSHA required training topics and industry specific hazards such as Acids and arc flash hazards.	Plant personnel are budgeted to spend 20 hours per year per employee. The training provided can be a mix of general awareness and authorized (hands-on) with either the supervisor and/or a certified trainer. The amount and type of training received is contingent upon the job description. The retraining addresses all workplace hazards applicable to the industry. The various hazards addressed could be; control of hazardous energy, operating machinery safely and working around hazardous chemicals
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Yes, regularly inspected and replaced when necessary.	Yes.	Yes, supervision is responsible for replacing worn or defective equipment that is brought to them or they see is in need of replacement. In house store room is stocked with all necessary safety equipment.	Ball provides personal protection equipment appropriate to the hazards found in the plant. Plant supervision/management is responsible for ensuring that employees have and utilize the required personal protective equipment. There is no formal inspection program. The HR Manager in Plant 20 conducts biweekly inspections in conjunction with the maintenance and production supervisors.
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes.	Yes.	Yes, Preventive maintenance tickets are issued to inspect, replace and repair lighting on a scheduled system.	Appropriate access and egress to the facility is maintained in accordance with fire code and FMGlobal (insurance carrier) requirements. The plant has a program to periodically inspect and maintain access and egress lighting. Plant employees do routine documented inspections of egress lighting.

Company	Severstal Wheeling, Inc.	Royal Vendors, Inc.	Huntington Alloys Corporation	Ball Metal Food Container Corp.
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Yes. Required to be inspected by personnel.	Multiple layers are in place to inspect, guard, maintain, and operate machines. Employees are instructed during new hire orientation that they are to inspect all tools/machines before use. If any tool/machine is found to be damaged or suspect they are to refrain from using the equipment until checked and corrected. Checks on machinery are performed by maintenance personnel and the person in charge of safety. All employees are responsible for being observant and aware of any dangers.	Yes, daily start up sheets, auditing, and preventive maintenance work tickets.	Office equipment is not guarded but may undergo routine servicing to ensure it is operating properly. Production equipment is mostly guarded in accordance with OSHA and/or ANSI B-li guarding requirements. The plant maintains procedures and/or work instructions to periodically review machine guarding and maintenance requirements .
Is there a Program in Place to Address Emergency Preparedness?	Yes.	Yes. Escape routes; Accounting for employees; medical dutues; means of reporting fires. Alarm systems; evacuation, training, written plan.	Annual evacuation drills , annual review of emergency preparedness plan, annual touring of local emergency personnel to identify hazards that they may encounter.	Yes. The plant has an Emergency Contingency Plan which outlines specific procedures for addressing the types of emergencies that could occur at the facility.
Have you Been Certified by an International Standards Organization?	Yes. ISO 9001	Yes ISO 2000	Yes, Nadcap MTL: 9001: 2008; Nadcap NDT 17025; ASME Section III NCA 3800	No. Ball is in the process of implementing programs that would substantially satisfy the requirements of ISO 14001 and CHSAS 18001.
Do you Undergo any Regular Internal or External Safety Audits?	Yes, Refer to Answer #15.	Yes. Continuous internal safety audits. Company has invited the state SHARPE program to the facility for safety inspections.	Internal auditing on a departmental level by safety teams and annual audits by insurance and Plant Safety steering committee.	Yes. The plant undergoes a corporate EHS assessment every three years. The assessment consists of approximately 800 questions which cover both EHS compliance and management system elements.
Contact Person	Mr. Tim Rogers, Severstal Wheeling, Inc., 1134 Market Street, Wheeling, WV 26003	Charity Fleming, 426 Industrial Blvd, hearnesville, WV 25430	Mark E. Porter Safety, Health, and Environmental Specialist Huntington Alloys 3200 Riverside Drive Huntington, WV 25705	Joette Bailey Keown; Director Environmental Health and Safety; 9300 W. 108th Circle, Broomfield, CO 80021; 303.460.5433.

MANUFACTURING - TAB 2

Self-Insured Employers Safety Study Manufacturing Continued

Company	General Motors, LLC	The Homer Laughlin China Co.	Columbia West Virginia Corporation	Century Aluminum of WV, INC	JELD-WEN, Inc.	PPG Industries, Natrium WV Facility
Approximate Number of WV Employees	100 employees	943 employees	213 employees	20	73 employees	525 employees
Is there a Written Safety and Loss Program for Employees in Place?	Yes	Yes.	Yes.	Yes	Yes.	Yes.
Major Components of the Program	Noise, Air quality, hazardous chemicals, fall hazard, lockout	Safe practices, Housekeeping, hazards, fire prevention	PPE, Hearing Conservation, Hazards, Emergency Response, Lockout, Powered Vehicles, Confined Spaces		OSHA, S&H , Ergonomics, incident investigation, safety committee, smoke-free, visitor, snow and ice control	Hazard communication, respiratory protection, ergonomics, training, lockout/tagout, hearing conservation, confined space, hot work, electrical safety
Top 3 to 5 Programs in Place to Achieve Compliance	Noise and Air quality surveys. Use, storage, Labeling and clean up of all hazardous chemicals. Lockout	See above	Behavior Based Safety process	1. Hearing Conservation 2. PPE 3. Hazard Identification	Powered Industrial Trucks; Control of Hazardous Energy, PPE	Lockout/tagout procedure, confined space, hot work, hazard communication, management of change.

Company	General Motors, LLC	The Homer Laughlin China Co.	Columbia West Virginia Corporation	Century Aluminum of WV, INC	JELD-WEN, Inc.	PPG Industries, Natrium WV Facility
Is the Written Safety Program Enforced?	Yes, United Auto Workers. Periodic self-review.	Yes.	Yes. Violation can receive up to termination.	Through auditing and progressive discipline	Yes, trained. 3 step disciplinary policy.	Yes, facility disciplinary process
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes.	No.	Yes.	Yes	No.	Yes.
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes, monthly and weekly	No.	Yes. Monthly	Yes	Yes.	Yes, monthly.
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes, new hires are tested. Employee assistance program is subject to random unannounced drug testing	Yes.	Yes, Columbia Forest Product's program	If employees use drugs or alcohol they are terminated. Employees can be tested if there is reason to suspect abuse. If positive test, have opportunity to receive rehab. Following rehab, they are subject to random testing for remainder of employment. If positive test second time then terminated.	Yes--post-offer/pre-employment random, post-accident, and for-cause testing.	Yes, provisions for pre-employment, random, and reasonable belief screenings.

Company	General Motors, LLC	The Homer Laughlin China Co.	Columbia West Virginia Corporation	Century Aluminum of WV, INC	JELD-WEN, Inc.	PPG Industries, Natrium WV Facility
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	No.	No.	Yes, attendance bonus.	Annual performance salary increases and bonuses are partially dependant on safety performance for management. The bargaining unit is recognized through various programs that include retail gift cards	No.	No.
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	Yes.	Yes.	Yes	Yes	Yes.	Yes.
Do you have Safety Committees at the Workplace that Meet Regularly?	Yes.	Yes, monthly	Yes monthly	Yes	Yes.	Yes.
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes. Union and Management	Yes.	No, but there is a full-time Behavior Based Safety Facilitator.	Yes	No.	Yes.
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Yes. Weekly.	Yes, annually unless a change in the work area	Yes. All areas evaluated for LOTO. Job Safety Analysis were performed at one time.	Yes, surveys are repeated if the process or equipment changes or if a near miss or incident occurs	Yes. Quarterly	Yes. Routinely
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	Yes. Concerns and observations are listed and assigned. Posted in work areas and tracked weekly.	Yes, fix or change all safety issues		Action items are complied and assigned with designated completion dates. Action items are followed electronically until all are complete	Deficiencies are identified and entered into an electronic database. Tracked.	It depends the specific activity. Some assessment action items are tracked in electronic database.

Company	General Motors, LLC	The Homer Laughlin China Co.	Columbia West Virginia Corporation	Century Aluminum of WV, INC	JELD-WEN, Inc.	PPG Industries, Natrium WV Facility
Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?	Yes, the UAW/GM ADAPT program. Review restrictions on employees and also review on medical leave. The ADAPT program is audited by General Motors.	Yes have a full time workman's comp case manager. Yes.	Yes. Light duty is limited due to the nature of our jobs. Work with physician to understand restrictions. Yes, coordinated with HR and physician's directives.	Yes. When the plant was operational, they employed a full time nurse case manager who directed the process on a case specific asis while communicating with the employee's physician	Yes, General Manager typically manages this. Doctor's recommendation before being allowed back to work. Yes, Employees are not allowed back without a medical recommendation.	No. Has an established RTW process that makes every effort to reasonably accommodate work restrictions. Disability management team that meets bi-weekly.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	No.	No.	No.	No	No.	No.
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	Yes.	Yes	Yes.	Yes	Yes.	Yes. Routinely
Is All Training Mandatory?	Yes.	Yes	Yes	Yes	Yes.	Yes.
Are Written Manuals Used? If so, Please Describe.	Yes. Safety department and OSHA guidelines	Yes, depends on topic. Powerpoint presentations.	Videos and Procedures	Yes, a written training manual is provided to each new employee.	Yes. Differing formats by topic.	Yes. Training material is available in various formats.

Company	General Motors, LLC	The Homer Laughlin China Co.	Columbia West Virginia Corporation	Century Aluminum of WV, INC	JELD-WEN, Inc.	PPG Industries, Natrium WV Facility
Please Describe the Type and Length of Initial Training to New Employees	Classroom training on all topics above; approximately 4-8 hours.	Yes, new employee orientation (1/2 hour training) on the job training.	Harassment, spill prevention, proper physical techniques, PPE, vehicles, haz com, Bloodborne pathogens, LOTO, fire safety, confined space, and bbs training. 16 hours.	Each new employee receives one week of classroom training and 90 days of on-the-job training and evaluation.	4 hours of formal training, supervised on the job training. Frequency of checks decreases as they prove knowledge and ability.	Training scope, content and duration is dependent upon job. Week of initial training. OSHA, specific jobs.
Please Describe the Type and Length of Initial Training to Current Employees	Annual retraining. Last up to an hour in duration.	Annual classroom training	Same training as above with exception of bbs training. 7 hours. Annual training: LOTO, hearing conservation, haz mat.	Current employees receive 1-2 hours of classroom training monthly.	30 minutes of formal safety training per month.	Retraining is based on curriculum.
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Yes.	Yes.	Yes. BBS process. Weekly observations.	Yes, preshift safety meetings and inspections ensure this	Yes, Yes.	Yes, supervisors are required to recognize situations and take actions.
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes.	Yes.	Yes. Monthly audit.	Yes, all emergency lighting and lit signage is inspected monthly and weekly housekeeping audits	Yes, Yes.	Yes.

Company	General Motors, LLC	The Homer Laughlin China Co.	Columbia West Virginia Corporation	Century Aluminum of WV, INC	JELD-WEN, Inc.	PPG Industries, Natrium WV Facility
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Yes, machines are on a scheduled maintenance process.	Yes.	Yes. Monthly audit.	Yes. There is a written machine guarding program that is consistent with OSHA requirements	Yes.	Yes, electronic maintenance system.
Is there a Program in Place to Address Emergency Preparedness?	Yes, Practice addressing emergencies	Yes Emergency Evacuation program.	Yes. Emergency response program	Yes, the program addresses evacuation and mustering locations, as well as storm shelters	Yes, emergency preparedness written program which includes procedures.	Yes, NIMS compliant emergency response plan.
Have you Been Certified by an International Standards Organization?	No.	No.	Yes, ISO: 9001:2008	No	No.	Yes, ISO: 9000
Do you Undergo any Regular Internal or External Safety Audits?	Yes, weekly Safety Observation Tours. Yearly audit.	Yes, WV division of Labor annual OSHA voluntary inspection.	Yes, safety committee and bbs process internal audits. WV department of labor conduct voluntary OSHA compliance audits.	Yes, internal audits are conducted weekly by all management employees. Additionally, an outside audit consultant is used who audits the facilities against OSHA standards	Yes, surveys once per quarter.	Yes, facility conducts in house audits and corporate audit is every 3 years.
Contact Person	Dick Boyce, GM Customer Care and Aftersales, 608 Caperton Blvd., Martinsburg, WV	James Savina, Safety & Environmental Manager, 672 Fiesta Drive, Newell, WV 26050	Dave Hacker, Chris Groves, Liz Key, 242 Callahan Rd, Cragsville, WV 26205; Kathy Fitzgerald 7900 Triad Center Drive, Ste 200, Greensboro, NC 27409	Jeff VanMatre Century Aluminum of WV, INC	Elaine Dunham, Insurance Specialist II, risk Management Administration. P.O. Box 1329, 3922 Lakeport Blvd., Klamath Falls, OR 97601	R.J. Feldmeier, PPG Industries, P.O. Box 191, New Martinsville, WV 26155

MANUFACTURING - TAB 3

Self-Insured Employers Safety Study Manufacturing Continued

Company	E. I. DuPont de Nemours & Company, Washington Works	Goodrich Corporation	Guardian Fiberglass	Toyota Motor Manufacturing, West Virginia	Alliant Techsystems, Inc.
Approximate Number of WV Employees	1900 employees; 1450 Washington Works; 450 Belle Works	342 employees	111 employees	1,100 employees	570 employees
Is there a Written Safety and Loss Program for Employees in Place?	Yes, we have written safety policies and procedures for all employees. We also have procedures and testing for respirable dust, NARF's and noise.	Yes.	Yes	Yes.	Yes.
Major Components of the Program	We require employees to meet all safety policies and procedures as a job requirement. These policies and procedures are reviewed on a periodic basis to maintain effectiveness and compliance with all current State and Federal guidelines. We conduct annual audiograms for those individuals who meet criteria per OSHA guidelines. Areas are audited for compliance to OSHA standards by both internal and external personnel. We conduct routine safety meetings and provide additional safety training on many work place hazards, cranes, rigging, fork-truck operation and other routine tasks.	Respiratory, Hazard Communication, Noise, Lockout/Tagout, Confined Space, Environmental, Emergency Action Plan, PPE	Hearing Conservation addresses mandatory use of hearing protection on production floor, mandatory dual hearing protection on the hot end. Respirator Policy addresses times when respirators are mandatory. Industrial Hygiene survey data is used to update and revise policies.	Hearing Conservation, Chemical Safety, HazComm, Ergonomics, Communications	Safety, Hazard, permits, PPE, Emergency, loss, vehicle, performance.

Company	E. I. DuPont de Nemours & Company, Washington Works	Goodrich Corporation	Guardian Fiberglass	Toyota Motor Manufacturing, West Virginia	Alliant Techsystems, Inc.
Top 3 to 5 Programs in Place to Achieve Compliance	We conduct routine safety meeting to prevent employee injuries. We monitor our OSHA injury frequency for all employees, our goal is zero. As stated above we conduct annual audiograms for those impacted employees in hearing protection required areas. We have a cross functional safety team that presents ideas to improve safety and address employee concerns. We participate in local community meetings (CAPS or LEPC's) to address community concerns as well as employee issues. We have on site medical staff and fire brigades to assist with incident and injury mitigation.	Hazard Communication, this program address our chemical use as to proper handling, PPE, labeling, MSDS, etc Respiratory Program, this program address the usage of respirators, where they are needed, care of the respirator, and hazards to look for when wearing the respirator Noise Program — this program address the noise areas of the facility, the proper way to wearing hearing protection, audiometric testing.	Hearing Conservation Policy, Respirator Policy, Industrial Hygiene Survey	Lockout; ergonomics; risk assessments	Safety, Health and Loss Prevention; Hazards; PPE
Is the Written Safety Program Enforced?	Yes, employees are trained in all aspects of safety and occupational health and can be disciplined up to and including separation for violation of stated policies and procedures.	Yes, through constant reminders at start up meetings, all employee meetings, tool box talks, and the progressive discipline process.	Employees not following programs could be issued a negative entry in their file. We also have in place a progressive discipline program to include disciplinary action up to and including termination. Safety check sheets, monthly safety training, supervisors completing "safety walks" every morning.	Through handbook and standard-consistent safety enforcement matrix	Yes. Workforce, disciplinary action.
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes, basic principles being all injuries, incidents and illnesses are preventable.	Yes	Yes and also in safety manual.	Yes	Yes.

Company	E. I. DuPont de Nemours & Company, Washington Works	Goodrich Corporation	Guardian Fiberglass	Toyota Motor Manufacturing, West Virginia	Alliant Techsystems, Inc.
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes, our site senior leadership address safety and loss programs quarterly.	Yes	Yes	Yes monthly	Yes.
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes, we have a written site policy for drug screening. This program is a random drug screening for employees in safety sensitivity roles. The testing is conducted by trained registered nurses for alcohol; urinalysis is done by an off-site certified lab for various illicit drugs. The program is then monitored by our contract site physicians.	Yes, we are a FAA certified location which makes us have a certified program. We have a random pool for safety sensitive employees which is the computer generates a candidate for testing. If the employee tests positive they are removed from work and meet with an SAP and follow all the requirements they stipulate for recovery and return to work and then return to work and test negative. They are then placed in testing for 60 months to ensure they remain compliant. If they do not choose this option they will be terminated. All other employees can be tested for reasonable suspicion, and accidents. They same consequences apply to this group as does the safety sensitive employees. Any employee testing positive twice for either drugs or alcohol will be terminated.	a. Yes, all new hires (prior to hire) are given a 5-panel drug screen b. Any employee involved in a forklift accident are given a drug and alcohol screen c. Any employee seeking medical attention due to a work related accident are given a drug and alcohol screen; d. An employee may be asked to submit to random (periodic, unannounced) testing for a given period of time following an incident of reasonable suspicion. self disclosure or other for-cause reasons. e. Any new hire that test positive would not be offered employment f. Any existing employee testing positive could be ground for termination. g Any employee refusing to agree to the testing is a violation of the policy and grounds for termination	we have a no tolerance policy. Testing can and will be administered.	Yes. Suspicious behavior checklist. HR and Management review.

Company	E. I. DuPont de Nemours & Company, Washington Works	Goodrich Corporation	Guardian Fiberglass	Toyota Motor Manufacturing, West Virginia	Alliant Techsystems, Inc.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	Yes, both exempt and non-exempt employees participate in various incentive based programs for safety loss prevention. Most notable is our Corporate "Board of Directors" safety award program which we just received for 2010. These programs are both monetary and prized based per our Corporate guidelines.	No.	Safety contests (such as reaching a designated milestone, we would give out t-shirts, hold cookouts, pizza party etc).	KIP: OSHA rate, Lost-time rate and combined severity Day Rate that affects tm bonus.	Yes. Safety Performance is part of the weight into year-end value sharing incentives
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	Yes, the progress discipline process moves from verbal, written corrective, probationary and ultimately separation of employment.	Yes.	Yes	Yes	Yes.
Do you have Safety Committees at the Workplace that Meet Regularly?	Yes, we have area safety teams, a site safety team SMART, (safety motivation and resource team), and a site staff team which meet, weekly, monthly and quarterly as designed.	Yes, we have a committee that meets monthly	Yes. Meet about safety issues as they occur. Safety training is held monthly.	Yes	Yes.
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes. At the Washington Works site we have 6 full time resources dedicated to various S&OH roles. At the Belle site we have 4 full time resources with assistance from several others in various roles.	Yes, Chris Bennett, EHS Coordinator	Yes	Yes. 3 employees	Yes.

Company	E. I. DuPont de Nemours & Company, Washington Works	Goodrich Corporation	Guardian Fiberglass	Toyota Motor Manufacturing, West Virginia	Alliant Techsystems, Inc.
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Yes, safety surveys are completed annual by a multi-functional team.	Job Safety Analysis and Risk Assessments have been completed for all work areas in the facility. They are reviewed every 3 years if no change in the work area has occurred, if a change has occurred in the work area the JSA and Risk Assessment are updated accordingly.	Yes, and updated when/if process changes or due to an accident.	Risk assessments are completed and checked annually	Yes. Area Health and Safety Teams' responsibilities.
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	Issues are tracked via an electronic spreadsheet with completion dates and verification process for follow-up on the next audit.	Based on the risk score associated with the issue, the higher scoring (most severe) issues are addressed first and then we move on down through the next highest scoring issues until completed. This process is a quick moving process so that employees are not put in hazardous situations.	HR is responsible for insuring issues reflected in the surveys	Prioritized by quantifiable risk score, posted and tracked until complete. Audit to confirm.	Safety reviews are part of the continuous process of all Safety Teams.

Company	E. I. DuPont de Nemours & Company, Washington Works	Goodrich Corporation	Guardian Fiberglass	Toyota Motor Manufacturing, West Virginia	Alliant Techsystems, Inc.
<p>Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?</p>	<p>Yes, we have a professionally staffed medical facility on site. The medical director (who is a licensed Medical Doctor) in consultation with the employee's attending physician will write specific instructions on any restrictions to full duties. We then match these to available restricted, modified or light duty work. Yes, our medical staff reviews each employee disability record to determine appropriate return to work criteria. A Case Management meeting is scheduled between Medical staff, HR and supervision to determine appropriate duties for return to work (no confidential medical information is discussed).</p>	<p>We do not have a written return to work policy but we do incorporate a return to work policy when employees are injured. Physicians are informed we do have a return to work program and can accommodate most restrictions and from that we place the employee in job that will comply with restrictions. We do not have a written return to work program but the return to work program is understood by management and employees and is utilized at the facility. All employees are informed as well as local physicians that Goodrich has a return to work program and based on work restrictions given by the physician we can accommodate most restrictions.</p>	<p>We accommodate work restrictions for each employee. HR Manager is responsible.</p>	<p>Yes, if occupational, all restrictions must be doctor written. Total of 90 calendar days for restrictions-lost. All tm's returning from Dr. must have written documentation with them. Yes required to be used or team member is sent home.</p>	<p>Yes. Administered through our Medical department and Plant physician. If the restrictions can be accommodated, the individual is returned to work.</p>

Company	E. I. DuPont de Nemours & Company, Washington Works	Goodrich Corporation	Guardian Fiberglass	Toyota Motor Manufacturing, West Virginia	Alliant Techsystems, Inc.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	Because our short term disability benefit includes up to 6 months of full pay, we constantly monitor progress to assure return as soon as medically possible. In addition, we have found that appropriate return as soon as possible actually aids the healing process. The incentive to the employee is that paid disability ends if the employee refuses prescribed restricted, modified or light duty work. The incentive to management is to minimize the hours off per employee because the employee is needed to complete the crew to meet production needs and minimize overtime costs.	No.	Loss control awards.	Yes, affect all TM's KPI	No.
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	Yes, we provide both initial training and refresher training for employees and supervisors in all the items listed above.	Yes.	Yes	Yes	Yes.
Is All Training Mandatory?	Per OSHA guidelines and per job requirements	Yes.	Yes	Yes	Yes.

Company	E. I. DuPont de Nemours & Company, Washington Works	Goodrich Corporation	Guardian Fiberglass	Toyota Motor Manufacturing, West Virginia	Alliant Techsystems, Inc.
Are Written Manuals Used? If so, Please Describe.	We have a full-time employee staffed training group. They have developed Training Manuals based on JTA5 & ODs (Job Task Analyses and written Operating Directions)	No.	Policies and procedures are used during the monthly training.	No. Powerpoint.	Powerpoint or CDS. Quizzes
Please Describe the Type and Length of Initial Training to New Employees	New employees receive 5 weeks of site orientation training including Classroom, exercises and hands-on simulation. Orientation covers OSHA regulatory training, DuPont safety training and standards, Foundational process technology training, and transferable skill training per their position assignment.	New employees get new hire safety orientation in the classroom and lasts for approximately 2 hours which goes over the emergency action plan and evacuation procedures; hazard communication which goes over the chemical hazards they may be exposed to and the proper handling of the chemicals, PPE they need, MSDS locations and how to read them, labeling of the chemicals and where to find the proper HMIS label; General plant safety rules; Bloodborne pathogens awareness; ergonomics awareness; disposal of hazardous waste. The on the job training under supervision goes on for a minimum of approximately 3 weeks before they are allowed to work unsupervised and this training puts into practice all the safety information given in the safety orientation as well as safety orientation to the department. No retraining on the job is done, but we do have mandatory annual safety trainings that cover what is learned in new hire safety orientation.	Hearing Conservation, Respirator, Confined Space, Hazardous Communication, Lock Out Tag Out, Safe Lifting, Heat Stress, Building Evacuation, Fire Extinguisher Training, 1 Aid training, Forklift Training. Training is conducted both in classroom setting and 'hands on training" when applicable.	One week long; 3 week work condition course. Safety Orientation reviews all materials (8 Hours).	New Hire orientation. All safety issues.

Company	E. I. DuPont de Nemours & Company, Washington Works	Goodrich Corporation	Guardian Fiberglass	Toyota Motor Manufacturing, West Virginia	Alliant Techsystems, Inc.
Please Describe the Type and Length of Initial Training to Current Employees	Once assigned to a position, employees are assigned a qualification manual of the position specific tasks and a workplace trainer They work with the workplace trainer to complete the manual, then they are given a pre-test to access knowledge, followed by a hands-on skill demonstration complete by their direct supervisor. Employees are retrained per current OSHA refresher standards and on position specific job per DuPont® PSM 3 year refresher cycle.	Current employees get a minimum of 1 hour classroom safety training per month. These are our annual trainings such as Hazard communication, bloodborne pathogens awareness, ergonomics, drug and alcohol awareness. lockout/tagout awareness, confined space awareness, etc. Current employees also receive some on the job refresher training as need throughout the year. The trainings identify hazards such as but not limited to chemical, electrical, thermal, and PPE.	Each month a designated topic is reviewed to include administering a test to all employees This training is mandatory. Any time a policy or procedure changes employees are given the newly revised policy and the change(s) are reviewed in either monthly department meetings or a daily pre-shift briefings/meetings.	Retraining is done on an annual basis by schedule so February is and always will be lockout month.	annual retraining is provided for certain topics. 30-90 minutes.
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Yes, we provide ANSI standard safety toe shoes, safety glasses, hard hats, cotton or Nomex* fire retardant garments per job classification. Safety PPE is inspected annually and replaced as needed or sooner if deemed necessary by the employee with supervisory approval.	Yes, all employees that need PPE have been given PPE and have access to new PPE as needed. Supervisors ensure that PPE is being utilized and being donned correctly.	Yes and inspect for use	Yes, evaluate through Job hazard analysis and risk assessments.	Yes. Identified during the new material assessment. Require inspection of PPE prior to donning such to perform a workplace function.

Company	E. I. DuPont de Nemours & Company, Washington Works	Goodrich Corporation	Guardian Fiberglass	Toyota Motor Manufacturing, West Virginia	Alliant Techsystems, Inc.
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes, we provide multiple entrances and exits to our site via turnstiles with electronic card readers for security. Emergency lighting is inspected annually and monitored by all employees and repaired per standard work orders by site maintenance on a routine basis.	Yes, we have many access and egress points throughout the facility and all are well marked and lighted. All evacuation routes and throughout the facility have emergency lighting.. Our emergency lighting system is tested monthly for readiness and access and egress doors are checked daily to ensure they are not blocked.	Yes, we provide access & egress to the facility with emergency lighting. Periodic inspection is conducted to ensure properly maintained. In addition 2 drills per year are held.	Yes, facilities manages this and we have backup power	Yes. Standards such as BOCA, NFPA, OSHA.
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Yes, we have a corporate standard (S44G) which we comply with for proper machine guarding. We utilized our site maintenance teams to annual check and verify machine guards are in place and in good working condition.	Yes, we have TPM events on all events that happen regularly and all machines are inspected regularly for safety. Our office equipment is leased and the leasing company regularly inspects and does maintenance on the machines.	Daily PM's are conducted on machines and equipments	Yes, facilities manages this and we have backup power	Yes. Standard. Items identified receive priority for repair.
Is there a Program in Place to Address Emergency Preparedness?	Yes, we utilize our site procedure, S&OH 510 for emergency preparedness. We maintain an internal fire brigade team which includes a minimum of 12 employees, with a new Pierce 2000gpm fire pumper, Dry Chemical powder truck and foam trailer along with our site ambulance for personal emergencies on site. We also conduct drills with our local volunteer fire departments and maintain open communication with law enforcement and local hospitals. We also actively participate on both the Wood County, WV and Washington County, Ohio LEPC's.	Yes, we have procedure ENS 10 which is specific for emergency preparedness. This procedure explains what to do, evacuation routes, gathering points when exit from the facility is necessary. It gives guidance on whom to call and information needed if a chemical spill occurs. It also gives guidance on what to do and who to contact in we have an industrial incident and outside agencies need to be notified.	Yes, emergency procedures addressed yearly	Emergency Response Plan	Yes. General Operating Procedure.

Company	E. I. DuPont de Nemours & Company, Washington Works	Goodrich Corporation	Guardian Fiberglass	Toyota Motor Manufacturing, West Virginia	Alliant Techsystems, Inc.
Have you Been Certified by an International Standards Organization?	Yes, the site has various businesses certified under ISO quality registrations, ISO-9000, and environmental registration under 1S014001. We are also a member of the American Chemical Council and participate in their RCMS program.	The Goodrich facility is ISO 9001 certified as well as NADCAP certified.	No	ISO 14001 and working on ISO 18001	No. Modeled after the proposed ISO safety standard. Maintain certification to AS 9100
Do you Undergo any Regular Internal or External Safety Audits?	Yes, we annually, Yes, all processes of the plant go through various internal audits both from site personnel and corporate resources from Wilmington, DE. These audits will be for process safety management, fire and safety audits, emergency preparedness, industrial hygiene and numerous other internal reviews of safety systems.	Yes, we undergo a minimum of 2 audits per year. The first in an ENS management systems audit which audits all program and procedures, and the second is a compliance audit using Dakota software. We also go under a hill corporate EHS audit every 3 years.	a. Daily safety tours b. Various inspection sheets c. Yearly loss control audit both by corporate and yearly internal plant audits d. Review of any and all near misses as they occur e. Review of any and all accidents	Through ISO, yes. Internal then eventually external.	Bi-monthly safety audits from Safety Specialist. Semi-annual conducted by our customers.
Contact Person	William A. Boyle, II Site SHE Manager E. I. DuPont P.O. Box 1217 Washington, WV 26181 Phone: 304-863-4262	Christopher A. Bennett, EHS Coordinator HC75 Box 1 Stringtown Road Union, WV 24983	Cindy Stegmaier	John Blaney	Karen L. Weakley, Director, Safety, Environmental, Health & Security, 210 State Route 956, Rocket Center, WV 26726

MANUFACTURING - TAB 4

Self-Insured Employers Safety Study Manufacturing Continued

Company	Pepsi Beverage Company	Kingsford Manufacturing Company	SWVA, Inc.
Approximate Number of WV Employees	620 employees	109 employees	450 employees
Is there a Written Safety and Loss Program for Employees in Place?	Yes.	Yes, the Kingsford Manufacturing Company has a written safety and loss program. For dust and noise, there is a respiratory protection and hearing conservation program and training is provided to employees on an annual basis. Additionally, hearing tests and fit tests are performed annually as well.	Yes
Major Components of the Program	Driving, lifting, hazard communication	<p>a. Vision Statement and Expectations</p> <p>b. Mandatory Training, including Corporate and plant refresher and new hire orientation and the following OSHA programs, Hazard Communication, Blood Born Pathogens, Confined Space Entry (select individuals), Electrical Safety, Lock Out Tag Out, FTO recertification (only those that drive fork Hfts), How to wear PPE, Hearing Conservation, CPR (select individuals), First Aid (select individuals), Fall Protection, Proper Lifting, Right to Know, Fire Extinguisher training, DOT Hazmat (select individuals), Storm Water Pollution Prevention, Hazardous Waste Program Management, Oil & Hazardous Substance Spill Notification, and Spill Prevention and Response Plans.</p> <p>c. Monitoring (Dust, Solvent, Hearing, Paint Containing Lead, etc) — Dust monitoring is performed quarterly based on area. For Lead Paint, before the company grinds, welds, or cuts, we test the paint (by sending it to an outside lab) to see if it contains lead, and then employees wear the appropriate PPE if required.</p> <p>d. Enforcement</p>	PPE, Fall Prevention, Lockout/Tagout/Tryout, confined space, hazard communication, hearing conservation.

Company	Pepsi Beverage Company	Kingsford Manufacturing Company	SWVA, Inc.
Top 3 to 5 Programs in Place to Achieve Compliance	Human Tech Training; Professional Athlete (taking care of your body); OSHA annual training; Bloodborne Pathogens	<p>The top programs that are in place are:</p> <p>i. STOP Safety Observations Program — this is a program that is a behavior based safety process that identifies and corrects “at risk” or unsafe behaviors. It has broad based employee support and participation, a system that analyzes, tracks and communicates safety observation data and trends in the data, and includes a problem solving process to eliminate root causes of “at risk” or unsafe behaviors. Any issues that are identified are reviewed at the monthly department team meetings.</p> <p>n. Training — we have mandatory training for new hires and for current employees. This training is tracked in a dedicated training computer system and we have a Training & Qualification pillar owner employee who conducts, coordinates and monitors the training. This is audited every month.</p> <p>iii. “Life Safety Issues” policy that names seven areas that if the policy and/or procedure for a named area is not followed, then the minimum punishment is a suspension, and termination of employment can result. These violations are reviewed by corporate management. This addresses enforcement and expectations.</p>	Lockout/Tagout/Tryout (prevents potential injury); PPE; Confined space (prevents employees from being injured while working in areas that are not designed for continuous human occupancy).
Is the Written Safety Program Enforced?	Yes. Disciplinary Process; internal audits; 30 day orientation program	Yes, the written safety and loss program is enforced thru several systems. First, it is enforced thru each employee being involved in the STOP Safety Observation program and looking to correct issues. Each employee is required to perform a minimum of three STOP observations per month. This is tracked each month, and if an employee fails to perform the observations, he is subject to discipline. Each employee, both hourly and salaried, has annual written evaluations that always include a rating and comments on safety performance and their commitment to safety. We also have monthly safety committee meetings and monthly department meetings to reinforce the program, and use progressive discipline and the corporate “Life Safety Issues” policy that also has discipline associated with its violation. We have monthly department audits, semiannual audits and bi-annual audits to confirm that the program is being followed.	Yes; training, written warnings, termination
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes.	Yes, the guiding principles are posted on the lunch room bulletin boards near the time clocks and on two video monitors in the plant where all employees see it daily. These guiding principles are signed by the Plant Manager.	no. 40 page safety policy distributed to each employee.
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes meeting annually to review all policies; there is a first quarter meeting with all managers.	Yes, senior (plant) management meets at least once a year to review the safety and loss program. We do this during an off site meeting in the summer before the beginning of our fiscal year. All members of management and a select group of hourly employees are involved in this review.	No. Policy is reviewed frequently to ensure its effectiveness.

Company	Pepsi Beverage Company	Kingsford Manufacturing Company	SWVA, Inc.
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes. Follow all DOT standards for testing.	Yes, we have a written drug and alcohol testing policy. AN prospective new employees must pass a physical exam, which includes a drug test. AN temporary employees that will work for more than 3 days must also pass a drug test. If the company has a reasonable suspicion that an employee is using illegal drugs/alcohol, or under the influence of them, then the employee may be tested to determine fitness for work. Refusal to undergo any test or a confirmed positive test could result in termination of employment. The company provides an Employee Assistance Program, which offers professional evaluation, counseling and referral services to help deal with drug and/or alcohol related problems.	Yes. Provide all employees a safe work environment. Deter abuse, reduce the frequency of occupation injuries; An employee may contact Co. and request a leave of absence for substance abuse treatment so long as the employee seeks the leave of absence prior to being identified b the Company for testing and so long as there is no other requested leave for such causes in the five year period prior to the request. Paid short term disability during their absence. Talks about insurance and behavior after rehabilitation.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	National driving program for reduction of frequency and lost days.	No, there are no physical or monetary incentives provided to managers or employees for reviewing and implementing the safety and loss program.	No.
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	Yes.	Yes, we have a progressive discipline policy to address violations of the safety and loss program. In addition, there is a corporate driven program named the "Life Safety Issues" policy that names seven areas that if the policy is not followed, then the minimum punishment is a suspension, and termination of employment can result. These violations are reviewed by corporate management.	Yes
Do you have Safety Committees at the Workplace that Meet Regularly?	Yes.	We have monthly safety committee meetings, and each department is represented at the meeting as is management. The meeting minutes are posted on the bulletin boards, and are reviewed at the next monthly department meetings.	Yes this committee meets monthly and consists of both management and bargaining unit employees.
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes.	We have one full time employee dedicated to oversight of our safety and environmental programs. His title is the Safety and Environmental Pillar Owner".	Yes.

Company	Pepsi Beverage Company	Kingsford Manufacturing Company	SWVA, Inc.
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Yes. Monthly inspection for all work areas.	We have completed safety surveys for each work area and each area is evaluated for occupational safety. Each month, the department safety representative and the department manager conduct a written safety survey for their department. The Safety Pillar Owner, with the department manager and department safety representative, conducts a written safety survey audit (using a standard checklist) of each department on a semi-annual basis and those reports are sent to all members of the plant's management team. In addition, there is a bi-annual Peer Safety audit that performs the same audit function, but with people from the outside the facility.	Yes Reviewed yearly and if a change in equipment has occurred, a review will be conducted at that time.
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	An action plan is created and sent to corporate office with 30 days of the audit.	above.	Yes. Employee training will be used to address issues found in the survey.
Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?	Transitional duty program. 90 days of jobs that will help the employee return to full duty. Yes. The safety manager is in charge of the program.	Yes, the company has a written RTW program and it is actively utilized by management and employees for work related injuries only. All employees who are injured away from work cannot return to work until they are evaluated by their doctors as return to duty--no restrictions. The plant HR Manager is the single point of accountability for this program and works with the injured employee, their doctor, and the employee's department manager to offer appropriate restricted, modified or light duty work. The plant manager reviews the status of any injured worker on a regular basis.	No, no RTW program. Yes, RTW Manager.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	No.	No.	No.
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	Yes. Annually. Tracked	Yes.	Yes.
Is All Training Mandatory?	Yes	Yes. And the Training and Qualification pillar owner tracks all training, and follows up to ensure it is completed in a timely manner.	Yes.
Are Written Manuals Used? If so, Please Describe.	Training DVDs and written materials.	All training is in a written format, but not in a manual. We have notebooks that have the training material in it, along with training outlines, but use overhead projectors, video tapes, DVD discs as well as hands on instruction for the training.	No, Training is conducted through the use of handouts, DVDs, and Powerpoint presentations.

Company	Pepsi Beverage Company	Kingsford Manufacturing Company	SWVA, Inc.
<p>Please Describe the Type and Length of Initial Training to New Employees</p>	<p>Part training is classroom and other is on hand training. There is a 30 day and a 90 day observation of new hire.</p>	<p>New employees spend their first five or six days in classroom training before they step foot in the manufacturing facility. Those first five or six days are all classroom training and administrative in nature. The training includes such topics as the Vision Statement, policies, procedures, fork truck training, housekeeping standards, mandatory OSHA training, and STOP training. Next, the new employee has hands on training for confined space, first aid, CPR, and mask fit test, and qualifies on a fork truck. Following the completion of all required training outside of the department, the new employee is teamed up with a trained trainer in the appropriate department, on the appropriate crew. The trainer, the new employee and the Training and Qualification pillar owner meet to review the department and job specific training, show where the job aids and job instruction breakdowns are, and discuss the training and review schedule. The trainer works directly with the new employee, and they meet weekly with the Training and Qualification pillar owner to discuss progress, answer questions and get feedback. The process is that the trainer works with the new employee on one piece of equipment, and qualifies them on it (including safety requirements) before moving to a new piece of equipment. New employees typically take at least three months before they are qualified in their job and can do their job on their own. Some of the workplace hazards addressed in the training are: lock out tag out, electrical safety, fork truck safety, fall protection, hearing conservation, slips & falls, and PPE.</p>	<p>Safety Training generally lasts in the area of 4-6 hours upon initial hiring. Items included are the entire Safety Policy and other general safety practices that have been mentioned previously. On the job training continues for employees for several months.</p>
<p>Please Describe the Type and Length of Initial Training to Current Employees</p>	<p>Same.</p>	<p>Current employees receive classroom training for the mandatory (OSHA, corporate, and plant) training each month, for an approximate total of 40 hours a year of classroom training. They also receive classroom, and hands on refresher training on fire extinguisher use, confined space, first aid, CPR, and mask fit testing, among other items. In addition, the employees receive hands on refresher training thru the Training and Qualification pillar owner and the team trainers on the hazards in their department on an annual bases on such things as but not limited to lock out tag out, electrical safety, fork truck safety, fall protection, hearing conservation, slips & calls, and PPE.</p>	<p>Retraining on hand safety, mobile equipment hazards, lockout/tagout, hazard communications, heat stress, PPE, respiratory protection, crane/slings/rigging, welding and burning, hearing conservation, fire prevention, fall protection and confined space entry is done annually.</p>
<p>Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?</p>	<p>Yes. Employees can request PPE. There is a monthly inspection.</p>	<p>Yes, the company provides appropriate personal protection equipment to employees, including hard hats, safety glasses, and lock out locks. Additionally, employees are reimbursed for steel toed boots. Depending on the position, some employees are issued a welding face mask, gloves, shirt top, and electrical safety gear (gloves, face shield, cotton jump suit). All equipment is inspected for serviceability and proper use during the monthly department safety surveys, and is verified that it is being properly utilized thru the STOP Safety Observation program.</p>	<p>Yes PPE. Employee inspects during every shift. Condition of employment to wear PPE.</p>

Company	Pepsi Beverage Company	Kingsford Manufacturing Company	SWVA, Inc.
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	All facilities have emergency exits, lighting and plans.	Yes, the company provides appropriate access and egress to the facility, including proper emergency lighting. Each emergency Light is on a computerized preventative maintenance inspection list, which is performed by a member of the maintenance department. The results and status of this is reviewed at the monthly safety committee meetings. Inspection of access and egress and lighting are inspected at monthly department safety surveys, semi-annual safety audits, the bi-annual Peer safety audit; results are reported to all members of management team. Signs are posted.	Yes.
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Most of the equipment in a location is on a PM schedule with outside contractors.	Yes, all machines (including office equipment) are properly inspected, guarded, maintained and operated. This is also inspected during the monthly department safety surveys	Yes--All equipment is checked monthly according to preventive maintenance schedules.
Is there a Program in Place to Address Emergency Preparedness?	Yes. Who to call, what to do, who is in charge.	Yes, there are programs in place to address emergency preparedness. e. Emergency Evacuation Plan — The Emergency Evacuation plan is the framework for all the other plans listed below. f. Fire Prevention & Emergency Plan — The plan includes the Fire Prevention program, what to do should a fire occur (actions, responsibilities, evacuation, roll call), training requirements, fire emergency action plan, and has numerous attachments such as emergency phone numbers, routes and equipment, warning lights, etc. g. Flood Evacuation Plan — The plan includes a description of what to do if a flood is possible, steps to take before a flood, when and how the various gates and pumps are to be used, what to do should a flood occur (actions, responsibilities, evacuation, roll call), and training requirements. h. Tornado Evacuation Plan — The plan includes a description of what to do if a tornado is possible, steps to take if there is a sighting or radio confirmation of a tornado, what to do should a tornado occur (actions, roll call), and training requirements. Chlorine Gas Alert Evacuation Plan (Beryl Site only due to the paper mill) - While the company does not use chlorine in its WV operations, the Beryl Site is next to a large paper mill, which uses chlorine in their operation. The Chlorine Gas Alert Evacuation Plan describes the action plan, evacuation signal, the all clear signal, the reporting process, as well as several attachments such as training, gas alert flow chart, emergency phone numbers, evacuation route, etc. Additionally, employees are trained on hazardous chemical spill clean up once a year using a video tape and lecture.	Yes- process of updating our posting in the plant with a completion scheduled at the end of May 2010. Reviewed annually after that.
Have you Been Certified by an International Standards Organization?	No.	No.	Yes ISO 2001;2008

Company	Pepsi Beverage Company	Kingsford Manufacturing Company	SWVA, Inc.
Do you Undergo any Regular Internal or External Safety Audits?	Yes, corporate office hires a 3rd party to perform an OSHA & DOT inspection.	Yes, we undergo regular internal and external safety audits. Each month, the department safety representative and the department manager conduct a written safety survey for their department. The Safety Pillar Owner, with the department manager and department safety representative, conducts a written safety survey audit of each department on a semi-annual basis and those reports are sent to all members of the plant's management team. In addition, the plant undergoes a three day Peer Safety Audit every two years. The audit is performed by safety representatives from other company plants, and also has representatives from the corporate Health, Safety and Environmental department. The results of the peer audit are given to the corporate Director of Manufacturing and any findings are documented and require regular follow up until resolved.	Yes--internal safety audits conducted by both management and bargaining unit teams at very least, monthly.
Contact Person	Mike Montgomery, 500 Southern Highway, Mineral Wells, WV 26150	Bill Wheeler, Highway 219, Parsons, WV 26287	Chris Artrip, Environmental, Health & Safety, SWVA, Inc., P.O. Box 2547, Huntington, WV 25726

MEDICAL

MEDICAL

HealthSouth Corporation

St. Mary's Medical Center

Heartland Employment Services, LLC

Wheeling Hospital

Charleston Area Medical Center, Inc.

Self-Insured Employers Safety Study Medical

Company	HealthSouth Corporation	St. Mary's Medical Center	Heartland Employment Services, LLC	Wheeling Hospital	Charleston Area Medical Center, INC
Approximate Number of WV Employees	820 employees (as of 3/31/2010)	1772 employees	1061 employees	2300 employees	6475 employees
Is there a Written Safety and Loss Program for Employees in Place?	Yes	Yes	Yes	Yes, has the seven Joint Commission Management plans, with the associated protection policies	Yes
Major Components of the Program	Vehicle Safety, Musculoskeletal Injury Prevention, Bloodborne Pathogens and OPIM Exposure Control, Hazardous Communication, TB Exposure Control, Violence Prevention Program, Safe Patient Handling, Biomedical Waste Control.	Emergency Management, Utility Management, Hazardous Materials, Life Safety, Medical Equipment Management, and Security	Safety Training; Safety Committees; Safety Awareness and Wellness Programs; Loss Control and Department Safety Inspection Checklists; Lift Injury Prevention System Program; and Method-Oriented Safety Thinking (M.O.S.T.)	Life Safety; Environment of Care; Safety Management; Hazardous Materials and Waste Management; Security Management; Medical Equipment Management; Utilities Management	Comprehensive plan including provisions for strain/sprain injuries, bloodborne pathogens, hazardous materials, noise, asbestos, etc. Each program address the purpose, responsibility, scope, risk reduction strategies, education/training, monitoring and evaluation and are designed to meet OSHA and Joint Commission Requirements
Top 3 to 5 Programs in Place to Achieve Compliance	Please see Above	1. Medical Equipment Program 2. Emergency Management 3. Life Safety 4. Safety Management Plan	Please see above	Please see above	1. Ergonomics: Strain/Sprain reduction 2. Bloodborne pathogen exposure reduction 3. Hearing protection 4. Respiratory protection

Company	HealthSouth Corporation	St. Mary's Medical Center	Heartland Employment Services, LLC	Wheeling Hospital	Charleston Area Medical Center, INC
Is the Written Safety Program Enforced?	Yes, It is the responsibility of the local administration to enforce all safety and loss programs.	Yes by the Environment of Safety Committee, Safety Officer, Management staff is empowered to correct any issues they are aware of. The staff member can call an anonymous 7400 hotline to leave any questions regarding safety problems if they choose not to directly address the issue with management	The company monitors location compliance through physical visits to the location by the area safety manager and other operations consultants and through information provided to the corporate office showing compliance	Audit and Review under the Hospital Safety Committee, adopted through the hospital Medical Dental Staff Bylaws	Program is enforced by management with the support of Safety. Managers evaluate each even for compliance and follow up with employees
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes	Safety program is posted on-line which all staff members have access	Posting of Safety Committee Meeting Minutes are posted in employee break room bulletin boards and do identify key issues. The company Employee Handbook (provided to each employee) provides the company stance on employee and patient safety as well	Each unit or department have a designated EOC Safety Bulletin Board, which have essential safety and emergency response information	No, safety manual is consistently available
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	The National Director of Risk Management for the Corporation reviews Risk Management policies periodically or as needed based on legislative and/or environmental changes and the needs of the program.	Yes, the vice-president of operations is a member on the committee who submits to the Board of review of programs quarterly and annually	Yes, at a minimum annually but usually happens on a quarterly basis	Once a year the Director of Safety, through the hospital safety committee files a yearly Environment of Care Report, based upon the seven major components. It benchmarks the safety goals and objectives along with statistical data. This data is then sent to Senior Management and the Board as part of annual reports	Yes, annual safety report is provided to hospital leadership and Board of Trustees
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes	Yes, reasonable suspicion testing may be undertaken when the medical center has reason to believe that an employee is in violation of the policy based on unusual, unexplained behavior in the work environment	Yes, there is post-offer and reasonable suspicion/probable cause drug and alcohol testing policies created at the inception of the drug test program (June 2003) and reviewed at least annually	Yes, the policy addresses the definition of "drugs", what constitutes a policy violation, reasons for testing employees, administrative procedures and an explanation of the employee assistance program	Yes, the written policy for drug screening includes pre-employment screening and "for cause" screening through Employee Health

Company	HealthSouth Corporation	St. Mary's Medical Center	Heartland Employment Services, LLC	Wheeling Hospital	Charleston Area Medical Center, INC
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	HealthSouth Corporation has a national incentive program each quarter to promote employee safety. At the end of each quarter, different safety/loss criteria are reviewed and either a group of hospitals or a single hospital is awarded for their efforts in employee safety	No	No, only recognition for working safely	Currently there are no safety incentive programs in place	Yes, compliance with safety program is included in annual evaluation for both managers and employees
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	There is a progressive disciplinary HR policy for violations of a policy	Yes, it is the philosophy of SMMC to follow a progressive corrective action on employees that are in violation of medical center policies, rules, and/or standards, including but not limited to St.Mary's Standards of Conduct	Yes, located in the company Employee Handbook	The hospital does have a Progressive Corrective Action Policy which covers discipline for safety violations	Yes
Do you have Safety Committees at the Workplace that Meet Regularly?	Yes	Yes, Environment of Care Meetings	Yes, monthly safety committee meetings	Hospital Safety Committee meets bi-monthly. Hospital Emergency Preparedness Committee meets bi-monthly	Yes, safety committee meets monthly
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	No	Yes, Director of Safety and Security	Yes	Yes	Yes, a safety manager
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Each hospital is responsible for a site specific safety program to include safety inspections	Yes, overall general safety surveys are done of clinical areas two times a year, non-clinical areas once a year	Yes, Department-specific checklists are to be completed monthly and reviewed by the safety committee	Formal Environment of Care/Safety walkthroughs are conducted at least monthly or more frequent based upon issues	Yes, safety surveys are conducted annually
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	Not answered	Yes, issues are discussed in the Environment of Care Meeting monthly and recommendations are made to senior management	Not answered	All surveys are addressed and reported to the hospital safety committee	Findings are followed up by management and both findings and corrective actions are reviewed by the Safety committee

Company	HealthSouth Corporation	St. Mary's Medical Center	Heartland Employment Services, LLC	Wheeling Hospital	Charleston Area Medical Center, INC
<p>Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?</p>	<p>Yes. It is the policy of HealthSouth to provide temporary modified duty for work related injuries. Modified duty is made immediately available and tasks are formulated to comply with the employee's abilities assessed by the treating physician. In most circumstances, modified duty will be available from the date of the injury until the employee returns to full duty or until the employee reaches a point of maximum medical improvement, permanent and stationary, etc. Modified duty work may be available for employees on a temporary basis while recovering from a work-related accident. Each hospital's RTW program is managed by that location's Human Resources Director. The HRDs work closely with all employees who are injured on the job and are in constant communication with the injured employees, the claims adjusters and the treating doctors to ensure they are providing modified duty jobs within the restrictions as prescribed by the treating physicians. Further a report is submitted from the local hospitals to the corporate each week listing out all employees who are currently on modified duty or lost time to ensure focus on that group</p>	<p>Yes. St. Mary's works with each employee and his/her medical provider and to facilitate the employee's return to work as soon as safely possible. The RTW program is utilized by management and staff. There is a position delegated for the workers compensation issues in the Human Resources Department and that person monitors the restrictions and positions that the staff member on modified duty holds</p>	<p>Yes. Coordination of a return-to-work program is handled by the human resources manager. The program is open to all employees but as a general rule limits the number of employees permitted to utilize the program to five percent of the employees at the location</p>	<p>The Fitness for Duty Policy addresses these issues. All employees who return to work for any occupational injury or illness are evaluated by the Corporate Health Department before released. Employees with an occupational injury who are returned to work by Corporate Health with some type of restriction are accommodated based on those restrictions. All restrictions are handled by the Human Resources Department in coordination with the employee's manager</p>	<p>Yes, transitional duty program is managed by a nurse practitioner "Transitional duty coordinator." The program allows for restricted, modified and light duty assignment. Each case is individually managed by the Coordinator, evaluating the employee, developing an individualized plan and implementing with management support. Each employee is referred to the Coordinator by Employee Health. This program is actively monitored and reported to the Safety Committee</p>

Company	HealthSouth Corporation	St. Mary's Medical Center	Heartland Employment Services, LLC	Wheeling Hospital	Charleston Area Medical Center, INC
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	HealthSouth has a national incentive program each quarter to promote employee safety. At the end of each quarter, different safety/loss criteria are reviewed and either a group of hospitals or a single hospital is awarded for their efforts in employee safety. Some of the criteria that may be taken into consideration when awarding a hospital and their employees may be their modified duty or lost time days	The incentive in using the RTW program is that the employee becomes available faster to earn a fully earning capacity	No	No	Yes, hourly rate for employees assigned to transitional duty are not charged to the department
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	Yes	Yes	Yes	Training is mandatory and provided on the Life Safety Code and Emergency Management. There is also workplace training such as forklift as well	Yes, all staff receive initial "new hire" orientation; ongoing education at their worksite; and annual review of safety practices. The educational program includes general safety, fire safety, emergency response, working with machines, proper ergonomics and physical techniques and violence in the workplace
Is All Training Mandatory?	Yes	Yes	The majority of training is mandatory. Monthly emergency response drills are on every shift but if the individual isn't working, he/she doesn't participate. However, new hire and annual training cover this topic and both of those are mandatory	Yes	Training for new hires and annual in-services are mandatory

Company	HealthSouth Corporation	St. Mary's Medical Center	Heartland Employment Services, LLC	Wheeling Hospital	Charleston Area Medical Center, INC
Are Written Manuals Used? If so, Please Describe.	Methods of training tools vary and are determined by job type	There are manuals available online if needed, however the majority of the training is done on-line through a training system	Yes and hands on training for some courses such as how to use a fire extinguisher	Written materials are used when doing other parts of the workplace training	Written training manuals are used by departments for specific information
Please Describe the Type and Length of Initial Training to New Employees	Due to the nature of patient lifting and transfers, HealthSouth focuses on Musculoskeletal and Back Injury Prevention with employees	New Employees depending on the position they are hired for have between 14-38 hours of training. The 14 hrs is general orientation that all staff is required to participate in. All hours after that are mainly for the clinical personnel. Clinical personnel are required to attend a skills day to cover ergonomic issues	General Orientation is 65 minutes and focuses on accident prevention and includes safety committee, accident/incident reporting, at-the-time-of-injury packet, etc. Following general orientation there is detailed training is followed up through job-specific training which can last 3-5 days depending on the job duties	Each new employee receives initial training in: Emergency Response; Fire/Life Safety/MSDS. Other training is provided by individual departments based upon position held.	New hire orientation provides a 3 hour overview; department specific training varies depending on the hazards in the specific environment
Please Describe the Type and Length of Initial Training to Current Employees	Retraining is specific depending on the nature of the injury, hazard and job. For HealthSouth employees, the greatest risk of injury is with patient handling. In the even of an injury, employees must go back through the Back Injury Prevention if they are injured on the job. It is roughly one hour in the classroom and working with a physical therapist on proper body mechanics	Current employees are required yearly to do on-line training modules which would take 2-8 hours depend on their job description. The 2 hour training would be for non-clinical areas. Also clinical personnel are required to attend a skills day to cover ergonomic issues.	All employees receive annual online mandatory in-services: Bloodborne pathogens (16 min); Electrical safety (11 min); Emergency Response (21 min; monthly fire and disaster drill training also); Fire Protection (11 min) followed by fire extinguisher training (15-20min); Hazard Communication (10min); Handing Sharps and Neddlesticks (10 min); and Infection Control (20 min)	The training listed above is done through departmental in-service education. Forklift training is provided every 3 years	Annual review of the comprehensive safety program is accomplished by interactive computer program, testing and documentation of successful completion for all employees

Company	HealthSouth Corporation	St. Mary's Medical Center	Heartland Employment Services, LLC	Wheeling Hospital	Charleston Area Medical Center, INC
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Yes	Yes	Yes, it is covered in department-specific checklists, reviewed at safety committee meetings, discussed in Quality Assessment and Assurance monthly meetings	Yes, department managers routinely check their designated areas to make sure that protective equipment is available and being used. Safety Management also inspects the area on a scheduled basis	Yes, appropriate PPE is provided in each work area. Evaluation of use is accomplished by audits, observation and review of reported events
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes	Yes, the director of facility operations has the responsibility of making sure regular inspection is maintained	Yes, managed by the facility operations department and documented in the Life Safety Code Documentation Manual with regular inspection. Employees are instructed to report issues to their supervisor or maintenance	The Life Safety Code is strictly adhered to and the hospital has a full inspection walkthrough by the WV Fire Marshall's office annually. Additionally, Environment of Care rounds are completed on a scheduled basis to identify and correct any potential areas of concern	Yes, access and egress including emergency lighting are provided and maintained
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Yes	Bio-Medical Department inspects and maintains all equipment in all clinical areas. Facility Operations handles all non-clinical equipment. The IS department maintains computers	Yes, managed by the facility operations department and reviewed at safety committee through monthly department-specific inspections. Employees are instructed to report issues to their supervisor or maintenance	Through scheduled Environment of Care rounds, all equipment is inspected for proper operation, electrical code adherence, along with maintenance and cleaning. Documentation is kept on file	Yes, all machines are reviewed for safety prior to purchase; reports of problems with equipment are managed by clinical engineering and maintenance. Reports of problems with machines/equipment are reported to safety

Company	HealthSouth Corporation	St. Mary's Medical Center	Heartland Employment Services, LLC	Wheeling Hospital	Charleston Area Medical Center, INC
Is there a Program in Place to Address Emergency Preparedness?	Yes, each hospital has their own site specific emergency preparedness plan	Yes	Yes, it cover various types of emergencies, every shift every month participates in fire/disaster drills as well as missing resident drills and all employees are required to take the online annual in-service on emergency response	Hospital has a formal Emergency Preparedness Committee that meets bi-monthly and has at least one full scale activation drill per year. Meeting minutes are kept	Yes
Have you Been Certified by an International Standards Organization?	No	No	No	No	CAMC complies with ISO standards
Do you Undergo any Regular Internal or External Safety Audits?	Joint Commission Survey per hospital every three years and individual safety audits are done internally at each site	Yes, there are internal safety audits; Joint Commission safety audits and CMS survey	Yes, internally at the location, area safety manager and facility operations and externally through OSHA inspections (not a regular basis)	Yes, through the hospital safety committee, safety audits are preformed and reported to the committee	Yes, safety audits are done regularly by management and safety. Hospitals are audited by the Joint Commission with a strong focus on safety- generally every 3 years
Contact Person	Karen Turpin HealthSouth Corporation	Marilyn Wilkes & Jack Vital St. Mary's Medical Center	Kathy Hutchison Director, Safety and HR Operations HCR ManorCare	John Sebring Safety Director Wheeling Hospital	Mary Caldwell and Lillian Morris Charleston Area Medical Center, INC

MINING

MINING

TAB 1:

Aracoma Coal Company, Inc.

U.S. Silica Company

Alex Energy, Inc.

Spartan Mining Company, Inc.

Mettiki Coal WV, LLC

Patriot Coal (On Behalf of Subsidiaries)

TAB 2:

Highland Mining Company

Performance Coal Company

CONSOL Energy Inc. (On Behalf of Subsidiaries)

Kingston Mining, Inc.

Rockspring Development, Inc.

Amfire, LLC

MINING - TAB 1

Self-Insured Employers Safety Study Mining

Company	Aracoma Coal Company, INC	U.S. Silica Company	Alex Energy, INC	Spartan Mining Company, INC.	Mettiki Coal WV, LLC	Patriot Coal (On Behalf of Subsidiaries)
Approximate Number of WV Employees	Not Stated	150 employees	Not Stated	Not Stated	190 employees	Eastern Associated Coal - 810 Rivers Edge Mining- 80 Pine Ridge Coal Co- 285 Appalachia Mine Services - 60
Is there a Written Safety and Loss Program for Employees in Place?	Yes and in addition, Aracoma has also adopted the Massey Energy S-1 Guidelines	Yes	Yes and in addition, Alex Energy has also adopted the Massey Energy S-1 Guidelines	Yes and in addition, Spartan has also adopted the Massey Energy S-1 Guidelines	Yes	Yes, the written safety process is called S.T.A.R. (Safety & Training for Accident Reduction)
Major Components of the Program	The Individual Safety Plan addresses miner training, accident prevention, mentoring, safety communications, personal safety protection and safety compliance. The S-1 guidelines address specific issues with respect to different types of mining and reflect best practices in safety.	Machine Guarding, hazard recognition, housekeeping, fall protection, electrical safety, mobile equipment safety, confine space entry, fire safety, hearing conservation, respiratory protection and first aid & CPR	The Individual Safety Plan addresses miner training, accident prevention, mentoring, safety communications, personal safety protection and safety compliance. The S-1 guidelines address specific issues with respect to different types of mining and reflect best practices in safety.	The Individual Safety Plan addresses miner training, accident prevention, mentoring, safety communications, personal safety protection and safety compliance. The S-1 guidelines address specific issues with respect to different types of mining and reflect best practices in safety.	The Comprehensive Safety Plan includes a safety policy, policy regarding personal safety protective equipment, training and accident reporting and investigation	In addition to the STAR process, they are governed by and comply with 30 CFR Part 47 HazCom standards requiring identifying, training and protection from health issues
Top 3 to 5 Programs in Place to Achieve Compliance	<ol style="list-style-type: none"> 1. Accident Prevention 2. Smoke Room Training Facility 3. Shelter Training Facility 4. Raymond Program (provides incentives for members to work safe) 5. Quarterly S-1 Audits (helps identify hazards) 	<ol style="list-style-type: none"> 1. Hazard Recognition (educates workers to identify hazards and initiate immediate corrective action) 2. Machine Guarding (guards all recognized pinch points from inadvertent contact) 3. Health Program 	<ol style="list-style-type: none"> 1. Accident Prevention 2. Quarterly S-1 Audits (helps identify hazards) 3. Raymond Program (provides incentives for members to work safe) 	<ol style="list-style-type: none"> 1. Accident Prevention 2. Smoke Room Training Facility 3. Shelter Training Facility 4. Raymond Program (provides incentives for members to work safe) 5. Quarterly S-1 Audits (helps identify hazards) 	<ol style="list-style-type: none"> 1. Roof Control Plan 2. Ventilation Plan 3. Program of Instruction (evacuation and fire fighting instructions) 4. Dust Sampling 5. Noise Sampling 6. Hazard Communication Program 7. Emergency Response Plan 	<ol style="list-style-type: none"> 1. Comprehensive Training 2. Audits & Inspections 3. Operation driven, specific governance (w/ Corporate oversight) 4. Investigation Standards 5. Corporate Audits

Company	Aracoma Coal Company, INC	U.S. Silica Company	Alex Energy, INC	Spartan Mining Company, INC.	Mettiki Coal WV, LLC	Patriot Coal (On Behalf of Subsidiaries)
Is the Written Safety Program Enforced?	Yes. Disciplinary Action, including discharge, may be implemented for failing to follow safety rules and guidelines.	Yes, all employees are trained to the programs and the existing management system enforces the program through observation for compliance.	Yes. Disciplinary Action, including discharge, may be implemented for failing to follow safety rules and guidelines.	Yes. Disciplinary Action, including discharge, may be implemented for failing to follow safety rules and guidelines.	Yes, it is mandated by state and/or federal regulation and company policy	In addition to a structured, corrective retraining, the STAR process has built-in provisions for disciplinary actions up to and including discharge.
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes. There are posters and stickers posted at various locations at the Worksite.	No, Employees are provided a personal copy of the program	Yes. There are posters and stickers posted at various locations at the Worksite	Yes. There are posters and stickers posted at various locations at the Worksite	Yes, it is posted on the mine bulletin board	The process is in written form and distributed during training. The policies and safety vision statement are posted.
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes. On a monthly basis, Aracoma participates in the Safety Development Group which consists of management, safety and operations personnel from the various resource groups. At that time, relevant safety issues are discussed and safety practices developed.	Yes	Yes. On a monthly basis, Alex Energy participates in the Safety Development Group which consists of management, safety and operations personnel from the various resource groups. At that time, relevant safety issues are discussed and safety practices developed.	Yes. On a monthly basis, Spartan participates in the Safety Development Group which consists of management, safety and operations personnel from the various resource groups. At that time, relevant safety issues are discussed and safety practices developed.	Yes, the state requires annual review of the program with all employees	Senior Management meets bi-monthly and gives direction and oversight to the various mine/plant/operations activities. The Central Safety Team acts as counsel for the various teams and conducts audits to insure consistency and effectiveness. Operational performance is tracked monthly and is distributed throughout the company.
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes. Aracoma prohibits the use of drugs or alcohol. All company members are subject to drug and alcohol testing when: 1. Reasonable cause exists to believe an employee has reported to work under the influence 2. An employee is involved in an accident 3. An employee has agreed as a result of disciplinary or employment issues 4. A random test	Yes. US Silica enforces a drug and alcohol free workplace. The program consists of pre-placement, post accident	Yes. Alex Energy prohibits the use of drugs or alcohol. All company members are subject to drug and alcohol testing when: 1. Reasonable cause exists to believe an employee has reported to work under the influence 2. An employee is involved in an accident 3. An employee has agreed as a result of disciplinary or employment issues 4. A random test	Yes. Spartan prohibits the use of drugs or alcohol. All company members are subject to drug and alcohol testing when: 1. Reasonable cause exists to believe an employee has reported to work under the influence 2. An employee is involved in an accident 3. An employee has agreed as a result of disciplinary or employment issues 4. A random test	Yes, Testing is done for all persons prior to employment and there is an Alcohol and Drug Abuse Policy in Place.	Yes, there is a testing program that is both random and for cause. The program is handled by a licensed or certified DOT vendor

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Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	Yes, members participate in the Raymond Program where workers receive points based on working accident free for set periods. The points can be exchanged for various items such as camping equipment, sporting goods, etc. Management can receive monetary performance bonuses which is based on a reduction in accidents and violations.	There are incentive programs designed toward meeting established goals that are determined periodically.	Yes, members participate in the Raymond Program where workers receive points based on working accident free for set periods. The points can be exchanged for various items such as camping equipment, sporting goods, etc. Management can receive monetary performance bonuses which is based on a reduction in accidents and violations.	Yes, members participate in the Raymond Program where workers receive points based on working accident free for set periods. The points can be exchanged for various items such as camping equipment, sporting goods, etc. Management can receive monetary performance bonuses which is based on a reduction in accidents and violations.	No	The respective operations have some type of Incentive Award in place to recognize superior performance in Safety & Compliance. The range of awards varies from monetary to gifts/awards.
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	No. Discipline is determined on a case-by-case basis and is not progressive in all cases.	Yes	No. Discipline is determined on a case-by-case basis and is not progressive in all cases.	No. Discipline is determined on a case-by-case basis and is not progressive in all cases.	Yes, the Employee Handbook	Yes, within the STAR process, the various operations have progressive disciplinary programs that run from verbal to suspension with intent to discharge.
Do you have Safety Committees at the Workplace that Meet Regularly?	Yes. All members meet weekly to discuss relevant safety topics.	Yes	Yes. All members meet weekly to discuss relevant safety topics.	Yes. All members meet weekly to discuss relevant safety topics.	Yes, a Safety Department/Mine Management Team	Yes, the STAR process, Mine Safety Teams and at represented operations, Safety Committees meet monthly.
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes. Aracoma has a Safety Director and a Safety Technician	Yes, both at the corporate and plant levels	Yes. Alex Energy has a Safety Director	Yes. Spartan has a Safety Director and Safety Technician	Yes	Yes, all Patriot Operations have a structured Safety Department, reporting to the Senior Manager over the operation

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Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Yes. At least once a quarter, if not more often, a safety audit is performed.	Yes, periodically or as conditions change.	Yes. At least once a quarter, if not more often, a safety audit is performed.	Yes. At least once a quarter, if not more often, a safety audit is performed	Yes, Regular "Behavioral Observations" of employees and review of "Safe Job Standards" for performing tasks underground. Inspections are completed every quarter	The STAR process audits are on-going and continually review the operation's trends and activities. Each operation maintains the data collected from the audits and uses this information to target problem areas. Processes are changed or developed to eliminate identified issues.
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	Yes. A copy of any deficiencies is given to management and they have one week to correct deficiencies. If a deficiency is determined to be hazardous, it is correct immediately while the audit team is on site.	Not stated	Yes. A copy of any deficiencies is given to management and they have one week to correct deficiencies. If a deficiency is determined to be hazardous, it is correct immediately while the audit team is on site.	Yes. A copy of any deficiencies is given to management and they have one week to correct deficiencies. If a deficiency is determined to be hazardous, it is correct immediately while the audit team is on site.	Hazardous conditions are immediately corrected when found. Information is discussed with individual employees or as a group during daily safety meetings	See Above
Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?	No. This is determined on a case by case basis depending on whether there is restricted, modified or light duty work available.	Yes, US Silica's program encourages management to identify transitional work activities for injured workers to enable them to maintain continuous employment.	No. This is determined on a case by case basis depending on whether there is restricted, modified or light duty work available.	No. This is determined on a case by case basis depending on whether there is restricted, modified or light duty work available.	Yes, Company policy requires employees to have a full release to return to work after having an on the job injury requiring medical attention	Primarily, because of the nature of the business, a full duty release is required. In some situations modified return to work within an established time frame based on the medical restrictions provided may be allowed. Each case is reviewed by local management for potential use of the program
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	No	Yes, all fees associated with injury and illness are charged back to the responsible department. The incentive is to meet or exceed budget.	No	No	No the policy is mandatory	No special incentives over and above the opportunity for the injured employee to maintain a higher pay benefit by working in the workplace.

Company	Aracoma Coal Company, INC	U.S. Silica Company	Alex Energy, INC	Spartan Mining Company, INC.	Mettiki Coal WV, LLC	Patriot Coal (On Behalf of Subsidiaries)
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	Yes, Aracoma trains employees for all workplace hazards including but not limited to, working with machines, proper ergonomics, proper physical techniques (such as lifting), ingress and egress to the facility, emergency preparedness and violence in the workplace.	Yes. The training program is driven by MSHA. It is a very comprehensive training standard that applies to all workers and includes new hire training of 24 hours, annual refresher training 8 hour minimum, job task training in the health and safety aspects of tasks assigned as well as visitors, vendors and customers visiting the facility.	Yes, Alex Energy trains employees for all workplace hazards including but not limited to, working with machines, proper ergonomics, proper physical techniques (such as lifting), ingress and egress to the facility, emergency preparedness and violence in the workplace.	Yes, Spartan trains employees for all workplace hazards including but not limited to, working with machines, proper ergonomics, proper physical techniques (such as lifting), ingress and egress to the facility, emergency preparedness and violence in the workplace.	Yes	Patriot Coal operates and maintains a full time staff working at a state of the art training center that offers both safety & technical training for employees. The center conducts both mandatory and discretionary, Safety & skill development training.
Is All Training Mandatory?	Yes	Yes	Yes	Yes	Yes	There is Mandatory and discretionary training
Are Written Manuals Used? If so, Please Describe.	Yes, depending on the type of class being conducted. In electrical training classes, handouts are used which include safety guidelines, approved testing devices, etc. Training also consists of videos.	Yes	Yes, depending on the type of class being conducted. During annual retraining, handouts on brake checks are provided. Training also consists of videos.	Yes, depending on the type of class being conducted. In electrical training classes, handouts are used which include safety guidelines, approved testing devices, etc. Training also consists of videos	Yes, Equipment and plan specific material is used	All programs have written training materials and manuals that are issued for training. Handouts, visuals, power-point presentations are re-enforced with hands-on or field studies
Please Describe the Type and Length of Initial Training to New Employees	Initial training consists of a four hour class that addresses and identifies hazards in the workplace.	New Hire training is 24 hours	Initial training consists of a four hour class that addresses and identifies hazards in the workplace.	Initial training consists of a four hour class that addresses and identifies hazards in the workplace	New miners are given training with site specific information pertaining to the hazards miners may be exposed to and a mine tour to point out potential hazards.	Not Stated
Please Describe the Type and Length of Initial Training to Current Employees	Retraining is performed every year. The retraining class averages eight to nine hours. The training is along the same lines and the initial training but it goes into greater detail	Annual refresher training is for a minimum of 8 hours	Retraining is performed every year. The retraining class averages about eight hours. The training is along the same lines as the initial training but it goes into greater detail	Retraining is performed every year. The retraining class averages eight to nine hours. The training is along the same lines and the initial training but it goes into greater detail	All miners are given 8 hours of annual training that is federally required and 8 hours of annual training that is state required.	Not Stated

Company	Aracoma Coal Company, INC	U.S. Silica Company	Alex Energy, INC	Spartan Mining Company, INC.	Mettiki Coal WV, LLC	Patriot Coal (On Behalf of Subsidiaries)
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Yes	Yes	Yes	Yes	Yes, the company provides: 1. Hand protection 2. Dust respirators 3. Hearing protection 4. Safety Glasses 5. High voltage gloves	All personal protection equipment required by the job is provided to employees, including special PPE required by HazCom
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes	Yes, area workplace inspections are conducted once each working shift	Yes	Yes	Yes	Access/Egress and emergency escape ways are provided as required by MSHA and state law
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Yes, each piece of equipment must be examined prior to start up and each piece of equipment is inspected weekly for problems or defects.	Yes	Yes, each piece of equipment must be examined prior to start up and each piece of equipment is inspected weekly for problems or defects.	Yes, each piece of equipment must be examined prior to start up and each piece of equipment is inspected weekly for problems or defects.	Yes	In addition to the respective agencies' requirements, the equipment/machinery is inspected and maintained.
Is there a Program in Place to Address Emergency Preparedness?	Yes	Yes, annual Crisis Management drills are conducted	Yes	Yes	Yes	All Patriot operations have comprehensive Emergency Response plans that are updated annually and drills are regularly conducted.
Have you Been Certified by an International Standards Organization?	No	Yes	No	No	No	Some of the various Preparation Plants maintain ISO certification

Company	Aracoma Coal Company, INC	U.S. Silica Company	Alex Energy, INC	Spartan Mining Company, INC.	Mettiki Coal WV, LLC	Patriot Coal (On Behalf of Subsidiaries)
Do you Undergo any Regular Internal or External Safety Audits?	Yes. Mine rescue teams perform a quarterly safety audit as a check and balance to the safety audits/surveys performed by Aracoma personnel.	Yes, a minimum of two inspections by the Federal Mine Safety & Health Administration as well as several internal EHS audits	Yes. Mine rescue teams perform a quarterly safety audit as a check and balance to the safety audits/surveys performed by Alex Energy personnel.	Yes. Mine rescue teams perform a quarterly safety audit as a check and balance to the safety audits/surveys performed by Spartan personnel.	Yes, External quarterly inspections by State and Federal (MSHA) inspectors for compliance. Internal safety inspections by the Safety Dept are done on a regular basis and periodic safety audits by corporate safety representatives	Yes, the Central Safety Team regularly conducts audits of the various operations along with periodic property loss inspections by an outside vendor.
Contact Person	Phillip Monroe Massey Coal Services Lewis Sheppard Aracoma Coal Company INC.	Bob Dailey Corporate Manager U.S. Silica Company	Phillip Monroe Massey Coal Services Jason Jude Highland Mining Company	Phillip Moore Massey Coal Services Lewis Sheppard Spartan Mining Company, INC.	Terry Savage Safety Director Mettiki Coal WV	Rob Mead Vice President & Treasurer Patriot Coal

MINING - TAB 2

Self-Insured Employers Safety Study Mining Continued

Company	Highland Mining Company	Performance Coal Company	CONSOL Energy Inc (On Behalf of Subsidiaries)	Kingston Mining, INC	Rockspring Development, INC	Amfire, LLC
Approximate Number of WV Employees	Not Stated	Not Stated	<p>CONSOL Energy Inc - 98 CONSOL of Kentucky, INC - 178 Fola Coal Company - 289 Laurel Run Mining Company - 0 Consolidation Coal Co. - 1702 Consolidation Coal Co. Eastern Region - 618 McElroy Coal Company - 910</p>	223 Employees	430 Employees	731 employees
Is there a Written Safety and Loss Program for Employees in Place?	Yes and in addition, Highland has also adopted the Massey Energy S-1 Guidelines	Yes and in addition, Performance has also adopted the Massey Energy S-1 Guidelines	Yes	Yes	Yes	Yes
Major Components of the Program	The Individual Safety Plan addresses miner training, accident prevention, mentoring, safety communications, personal safety protection and safety compliance. The S-1 guidelines address specific issues with respect to different types of mining and reflect best practices in safety.	The Individual Safety Plan addresses miner training, accident prevention, mentoring, safety communications, personal safety protection and safety compliance. The S-1 guidelines address specific issues with respect to different types of mining and reflect best practices in safety.	The program addresses hearing loss, conservation, fire prevention, accident prevention and dust control	Accidents (lost time, reportable and preventable); Attendance (encourage attendance as to not overwork existing workforce or neglect necessary duties); Compliance (encourage working with state and federal agencies to ensure safe working conditions); and health (dust and notice levels are consistently monitored)	Accidents (lost time, reportable and preventable); Attendance (encourage attendance as to not overwork existing workforce or neglect necessary duties); Compliance (encourage working with state and federal agencies to ensure safe working conditions); and health (dust and notice levels are consistently monitored)	The program addresses work practices/unsafe acts, hazards recognition and avoidance, personal protective equipment, health, accident investigation and employee involvement.

Company	Highland Mining Company	Performance Coal Company	CONSOL Energy Inc (On Behalf of Subsidiaries)	Kingston Mining, INC	Rockspring Development, INC	Amfire, LLC
Top 3 to 5 Programs in Place to Achieve Compliance	<ol style="list-style-type: none"> 1. Accident Prevention 2. Smoke Room Training Facility 3. Shelter Training Facility 4. Raymond Program (provides incentives for members to work safe) 5. Quarterly S-1 Audits (helps identify hazards) 	<ol style="list-style-type: none"> 1. Accident Prevention 2. Smoke Room Training Facility 3. Shelter Training Facility 4. Raymond Program (provides incentives for members to work safe) 5. Quarterly S-1 Audits (helps identify hazards) 	<ol style="list-style-type: none"> 1. SWI 2. Day 2 Training 3. Part 48 Training 4. ACE and 5. Safety Action Program 	<ol style="list-style-type: none"> 1. Safety Observation Program 2. Safety/Attendance Incentive Plan 3. Alcohol and Drug Free Workplace Policy 4. Maintenance Program (ensure quality equipment) 5. Employee Handbook 	<ol style="list-style-type: none"> 1. Safety Observation Program 2. Safety/Attendance Incentive Plan 3. Alcohol and Drug Free Workplace Policy 4. Maintenance Program (ensures quality equipment) 5. Employee Handbook 	<ol style="list-style-type: none"> 1. Employee driven workplace observation process 2. Safety Inspections and Audits 3. New employee training, annual refresher training, task training and regularly scheduled safety meetings
Is the Written Safety Program Enforced?	Yes. Disciplinary Action, including discharge, may be implemented for failing to follow safety rules and guidelines.	Yes. Disciplinary Action, including discharge, may be implemented for failing to follow safety rules and guidelines.	Yes, internal audits and MSHA, as well as state agencies, enforce their provisions.	Yes. The monthly safety bonus is reduced or eliminated to all unsafe workers during the affected period. Safety meetings and job instruction are used to conditions the employee as needed.	Yes. The monthly safety bonus is reduced or eliminated to all unsafe workers during the affected period. Safety meetings and job instruction are used to conditions the employee as needed	The program is reinforced through retraining, safety meetings and incentives. Discipline is implemented when necessary for serious or repeated infractions.
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes. There are posters and stickers posted at various locations at the Worksite.	Yes. There are posters and stickers posted at various locations at the Worksite	Yes	Yes, and is given to each employee when hired.	Yes, and is given to each employee when hired.	Yes
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes. On a monthly basis, Highland participates in the Safety Development Group which consists of management, safety and operations personnel from the various resource groups. At that time, relevant safety issues are discussed and safety practices developed.	Yes. On a monthly basis, Performance participates in the Safety Development Group which consists of management, safety and operations personnel from the various resource groups. At that time, relevant safety issues are discussed and safety practices developed.	Yes, it is more like daily meetings	Yes, each business unit has a continuous improvement coordinator and management meets daily, monthly, quarterly and yearly to discuss various programs and policies.	Yes, each business unit has a continuous improvement coordinator and management meets daily, monthly, quarterly and yearly to discuss various programs and policies.	Meetings of Senior Management, operations level management, safety representatives and employee representative are held monthly

Company	Highland Mining Company	Performance Coal Company	CONSOL Energy Inc (On Behalf of Subsidiaries)	Kingston Mining, INC	Rockspring Development, INC	Amfire, LLC
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes. Highland prohibits the use of drugs or alcohol. All company members are subject to drug and alcohol testing when: 1. Reasonable cause exists to believe an employee has reported to work under the influence 2. An employee is involved in an accident 3. An employee has agreed as a result of disciplinary or employment issues 4. A random test	Yes. Performance prohibits the use of drugs or alcohol. All company members are subject to drug and alcohol testing when: 1. Reasonable cause exists to believe an employee has reported to work under the influence 2. An employee is involved in an accident 3. An employee has agreed as a result of disciplinary or employment issues 4. A random test	Yes, Drug and Alcohol testing is conducted for the following reasons: 1. Reasonable cause to believe an employee is at work or has reported to work under the influence 2. When an employee is involved in an accident and the company has reason to believe drugs or alcohol may have contributed to the accident 3. When an employee is returning to work after an absence of at least six months 4. Random testing	Yes, Kingston has a zero tolerance policy for an employee's use of alcohol; use possession, sale, distribution, manufacture or dispensation of illegal drugs or paraphernalia; and/or misuse of prescription drugs while working for the company or on company property. The company has a confidential program in which an employee may seek professional help before the problem is discovered through random testing and leads to disciplinary action.	Yes, Rockspring Development, INC has a zero tolerance policy for an employee's use of alcohol; use possession, sale, distribution, manufacture or dispensation of illegal drugs or paraphernalia; and/or misuse of prescription drugs while working for the company or on company property. The company has a confidential program in which an employee may seek professional help before the problem is discovered through random testing and leads to disciplinary action.	Yes. Illegal or prescription abused drugs are prohibited. Pre-employment and random drug tests are conducted. Employees found violating the policy are discharged. Employees suspected of being under the influence of alcohol or drugs while on the job are tested. Positive findings result in discharge.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	Yes, members participate in the Raymond Program where workers receive points based on working accident free for set periods. The points can be exchanged for various items such as camping equipment, sporting goods, etc. Management can receive monetary performance bonuses which is based on a reduction in accidents and violations.	Yes, members participate in the Raymond Program where workers receive points based on working accident free for set periods. The points can be exchanged for various items such as camping equipment, sporting goods, etc. Management can receive monetary performance bonuses which is based on a reduction in accidents and violations.	Yes, there is a quarterly safety bonus plan in place that monetarily compensates employees if their respective location is safe and without injuries.	A monthly bonus check is given to each employee that qualifies along with promotional gifts for meeting pre-set goals.	A monthly bonus check is given to each employee that qualifies along with promotional gifts for meeting pre-set goals.	Yes. There is a monetary bonus plan that pays each month for meeting accident and citation targets. Extra incentive is built in for meeting yearly goals. In addition, the appraisal system for management employees has a large safety component.
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	No. Discipline is determined on a case-by-case basis.	No. Discipline is determined on a case-by-case basis and is not progressive in all cases.	Yes	Yes. Verbal Warning, Written Warning, Suspension and then Dismissal if warrantable.	Yes. Verbal Warning, Written Warning, Suspension and then Dismissal if warrantable.	Yes, for serious and/or repetitive infractions.
Do you have Safety Committees at the Workplace that Meet Regularly?	Yes. All members meet weekly to discuss relevant safety topics.	Yes. All members meet weekly to discuss relevant safety topics.	Yes, at locations where the United Mine Workers of America represent the hourly employee for purposes of collective bargaining	Yes	Yes	Yes, in the form of Employee Involvement Groups made up of workforce representatives from each shift as well as top management personnel at the operation.

Company	Highland Mining Company	Performance Coal Company	CONSOL Energy Inc (On Behalf of Subsidiaries)	Kingston Mining, INC	Rockspring Development, INC	Amfire, LLC
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes. Highland has a Safety Director	Yes. Performance has a Safety Director	Yes	Yes, there is a full time safety manager on site	Yes, there is a full time safety manager on site	Yes, a safety manager and a staff
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Yes. At least once a quarter, if not more often, a safety audit is performed.	Yes. At least once a quarter, if not more often, a safety audit is performed	Yes. All underground mine locations conduct surveys and update them on a quarterly basis. All surface mine locations do the same every six months.	Yes. Safety surveys are conducted daily by safety management, operational management and by the workforce itself. The Safety Observation Program has yielded high benefit since it was introduced a few months ago by the Operation's president.	Yes. Safety surveys are conducted daily by safety management, operational management and by the workforce itself. The Safety Observation Program has yielded positive results.	Yes. Job safety analysis, safety inspections and standard operating procedures accomplish this. Reviews are conducted periodically on an as needed basis. Ongoing and continuous evaluations are conducted through employee observation. Observation is recorded anonymously on cards and are reviewed daily and at monthly operation-level meetings. Specific action plans from the observations are developed and monitored for completion.
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	Yes. A copy of any deficiencies is given to management and they have one week to correct deficiencies. If a deficiency is determined to be hazardous, it is correct immediately while the audit team is on site.	Yes. A copy of any deficiencies is given to management and they have one week to correct deficiencies. If a deficiency is determined to be hazardous, it is correct immediately while the audit team is on site.	Yes. All issues are recorded in the Fireboss Book and corrected. Also, the Director-Safety Department does inspections once a year to make sure issues, if any, have been corrected	Not stated	Not Stated	Action plans are developed with specific assignments. The plans are written and monitored for completion

Company	Highland Mining Company	Performance Coal Company	CONSOL Energy Inc (On Behalf of Subsidiaries)	Kingston Mining, INC	Rockspring Development, INC	Amfire, LLC
Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?	No. This is determined on a case by case basis depending on whether there is restricted, modified or light duty work available.	No. This is determined on a case by case basis depending on whether there is restricted, modified or light duty work available.	There is no written return-to-work program; however a program (transitional duty) is in place. The supervisor worker's compensation, black lung and relocation plan, along with the patient's treating physician, the human resource supervisors and the TPA all work together to effectively manage the transitional duty program. Injured employees are returned to transitional duty work, as long as the medical restrictions can be adhered to, at the earliest point they are medically able to return and perform meaningful work.	Kingston has a functional testing program. This assures that anyone returning to work can return to their normal job without any further injuries.	Rockspring has a functional testing program. This assures that anyone returning to work can return to their normal job without any further injuries.	No. These cases are handled on a case-by-case basis by the operation's superintendent in collaboration with the safety and human resources departments.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	No	No	No	No	No	N/A
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	Yes, Highland trains employees for all workplace hazards including but not limited to, working with machines, proper ergonomics, proper physical techniques (such as lifting), ingress and egress to the facility, emergency preparedness and violence in the workplace.	Yes, Performance trains employees for all workplace hazards including but not limited to, working with machines, proper ergonomics, proper physical techniques (such as lifting), ingress and egress to the facility, emergency preparedness and violence in the workplace.	Yes	Yes	Yes	Yes
Is All Training Mandatory?	Yes	Yes	Yes	Yes	Yes	Yes

Company	Highland Mining Company	Performance Coal Company	CONSOL Energy Inc (On Behalf of Subsidiaries)	Kingston Mining, INC	Rockspring Development, INC	Amfire, LLC
Are Written Manuals Used? If so, Please Describe.	Yes, depending on the type of class being conducted. In electrical training classes, handouts are used which include safety guidelines, approved testing devices, etc. Training also consists of videos.	Yes, depending on the type of class being conducted. In electrical training classes, handouts are used which include safety guidelines, approved testing devices, etc. Training also consists of videos	Yes	Yes. Everyone that enters the property is hazard trained. Employees are tasked trained and hazard trained along with annual retraining once a year, as well as a yearly smoke/SCSR training and quarterly fire, water, gas or smoke evacuation drills.	Yes. Everyone that enters the property is hazard trained. Employees are tasked trained and hazard trained along with annual retraining once a year, as well as a yearly smoke/SCSR training and quarterly fire, water, gas or smoke evacuation drills.	Yes. Training plans are required by MSHA for experienced miner training, inexperienced miner training, annual refresher training, task training as well as training on specific emergency procedures and certain safety skills.
Please Describe the Type and Length of Initial Training to New Employees	Initial training consists of a four hour class that addresses and identifies hazards in the workplace.	Initial training consists of a four hour class that addresses and identifies hazards in the workplace	For underground new miners, a minimum of no less than 40 hours (classroom). Hazard training is given before commencement of work duties. For Surface, a minimum of no less than 24 hours (classroom) and have hazard training before commencing work duties.	All underground employees are required to have 80 hours of classroom then hazard trained in actual working conditions on dangers that exist in the workplace. They are also given a mine tour and task trained to the duties to be performed.	All underground employees are required to have 80 hours of classroom then hazard trained in actual working conditions on dangers that exist in the workplace. They are also given a mine tour and task trained to the duties to be performed	New employees that are experienced miners receive between 4 and 8 hours of initial training depending on the level of experience. Those that are not experienced receive a minimum of 40 hours for surface and 80 hours for underground. This is in addition to 4 hours on company related plans and policies. This is followed by on-the-job training in escape ways, machinery operation and hazard recognition.
Please Describe the Type and Length of Initial Training to Current Employees	Retraining is performed every year. The retraining class averages eight to nine hours. The training is along the same lines and the initial training but it goes into greater detail	Retraining is performed every year. The retraining class averages eight to nine hours. The training is along the same lines and the initial training but it goes into greater detail	All miners are given an annual refresher that is for a minimum of 8 hours and all known workplace hazards applicable to their task is addressed.	Task training is done once a year to reinforce the safety procedures needed and lasts a complete cycle to finish the duty. Experienced training is performed by certified instructors to re-emphasize dealing with the dangers of duties performed. Training lasts a minimum of 8 hours. Annual training is also performed in the classroom.	Task training is done once a year to reinforce the safety procedures needed and lasts a complete cycle to finish the duty. Experienced training is performed by certified instructors to re-emphasize dealing with the dangers of duties performed. Training lasts a minimum of 8 hours. Annual training is also performed in the classroom.	An 8 hour annual retraining class is required for all employees. Additional instruction is provided for shelter training and expectations training

Company	Highland Mining Company	Performance Coal Company	CONSOL Energy Inc (On Behalf of Subsidiaries)	Kingston Mining, INC	Rockspring Development, INC	Amfire, LLC
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Yes	Yes	Yes, appropriate personal protection equipment to employees who have the potential for exposure to a workplace hazard is provided and regularly inspected to ensure the equipment is being properly utilized.	Yes. All employees including management are required to wear some form of PPE, employees and management work together in assuring proper safety equipment is being used.	Yes. All employees including management are required to wear some form of PPE, employees and management work together in assuring proper safety equipment is being used.	Personal protective equipment is required and is periodically inspected to ensure it is in good condition and is utilized. This includes hard hat, protective glasses, hearing protection, metacarpal gloves, knee pads, and respirators.
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes	Yes	N/A for underground sites and yes for surface facilities	Yes. Kingston has an environmental crew that takes care of the roads, lighting, signs and reflectors needed to assure safe passage to the facilities.	Yes. Rockspring has an environmental crew that takes care of the roads, lighting, signs and reflectors needed to assure safe passage to the facilities.	Yes, as applied to surface structures/facilities. Underground escape ways are maintained in accordance with strict federal and state standards. Each escape way is inspected at least weekly. Quarterly emergency drills are conducted. Lifelines and emergency shelters and supplies are maintained.
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Yes, each piece of equipment must be examined prior to start up and each piece of equipment is inspected weekly for problems or defects.	Yes, each piece of equipment must be examined prior to start up and each piece of equipment is inspected weekly for problems or defects.	Yes. All underground and surface equipment is inspected weekly and is recorded in a permissibility book. Additionally, all underground equipment is inspected each shift.	Yes. Kingston has a maintenance program, 24 hour security officers and periodic safety exams	Yes. Rockspring has a maintenance program, 24 hour security officers and periodic safety exams	Electrical equipment is subject to a required weekly examination for defects that is recorded. Defects are corrected and documented. Also each operator is required to perform a pre-operation check on each machine to be operated.
Is there a Program in Place to Address Emergency Preparedness?	Yes	Yes	Yes	Yes	Yes	Yes

Company	Highland Mining Company	Performance Coal Company	CONSOL Energy Inc (On Behalf of Subsidiaries)	Kingston Mining, INC	Rockspring Development, INC	Amfire, LLC
Have you Been Certified by an International Standards Organization?	No	No	No	No	No	No
Do you Undergo any Regular Internal or External Safety Audits?	Yes. Mine rescue teams perform a quarterly safety audit as a check and balance to the safety audits/surveys performed by Highland personnel.	Yes. Mine rescue teams perform a quarterly safety audit as a check and balance to the safety audits/surveys performed by Performance personnel.	Yes, Corporate Safety Compliance Audits MSHA Quarterly Audits, State Agency Inspections and Fire Audits.	Random safety audits are performed by Kingston safety and management teams year round. Once a year a risk management team, from an outside source evaluate the condition of the property. Also, once a year, safety and management personnel are brought to the property from other business units inside the parent company to perform a safety audit.	Random safety audits are performed by Rockspring safety and management teams year round. Once a year a risk management team, from an outside source evaluate the condition of the property. Also, once a year, safety and management personnel are brought to the property from other business units inside the parent company to perform a safety audit	Regular safety inspections by safety staff. There is a formal review of practices each month
Contact Person	Phillip Monroe Massey Coal Services Jason Jude Highland Mining Company	Phillip Moore Massey Coal Services Jonah Bowles Performance Coal Company	CNX Center CONSOL Energy	Greg Fernet Kingston Mining, INC.	David Cook Rockspring Development, INC	Donald C. Presley Safety Manager Amfire, LLC

MUNICIPALITIES

MUNICIPALITIES

TAB 1:

City of Wheeling

Wheeling Park Commission

City of Huntington

City of Charleston

TAB 2:

City of Parkersburg

City of Fairmont

Fairmont City Police Department

City of Fairmont Fire Dept.

MUNICIPALITIES - TAB 1

Self-Insured Employers Safety Study Municipalities

Company	City of Wheeling	Wheeling Park Commission	City of Huntington	City of Charleston
Approximate Number of WV Employees	403 employees	702 employees (240 full-time; 462 part-time)	395 employees	825 employees
Is there a Written Safety and Loss Program for Employees in Place?	Yes	Yes	Yes	Yes
Major Components of the Program	Management commitment and employee involvement; worksite analysis; and prevention and control of hazards and unsatisfactory conditions	To provide a safe work environment protected from recognized hazards. Requiring employees to comply with all safety and health regulations whether established by management, the Commission or by federal, state, or local law. Employees should report all observed safety and health violations, potentially unsafe conditions and any accidents resulting in injuries to employees or customers. Employees are encouraged to submit suggestions to their supervisor concerning safety and health matters. Violations of safety rules, regs or procedures results in disciplinary action, up to and including discharge	The city's safety program encompasses all areas of safety encountered by its employees, including proper lifting techniques, appropriate use of PPE, defensive driving skills and working with and around electricity and mechanical equipment	Safety Training, Safety Procedures & Operations, Safety Checking and Corrective Actions
Top 3 to 5 Programs in Place to Achieve Compliance	<ol style="list-style-type: none"> 1. PPE 2. Hand and Power Tool Safety 3. Lifting and Carrying Safety 4. Trenching and Excavating Safety 5. Confined Space Process 	<ol style="list-style-type: none"> 1. Workplace Safety Training 2. Driver's Training 3. Fire Extinguisher/CPR, First Aid & AED Training 4. Equipment Training 5. Chainsaw Safety 6. Ski Lift Operating 7. Tyrollia Binding (fitting appropriate skis) 8. Pesticide Applicator Training 9. Basics of Ride-On and Hand-Held Equipment 10. Blood Borne Pathogens Training 11. Food Service Worker Training 12. Training for intervention procedures/responsible serving) 	<ol style="list-style-type: none"> 1. Lifting techniques 2. PPE 3. Defensive Driving 	<ol style="list-style-type: none"> 1. Monthly training covering associated job safety and procedures 2. Monthly safety committee meetings covering both safety issues and bi-monthly walk thru 3. Vehicle Fleet Policy/Accident Review Board 4. Drug and Alcohol Testing

Company	City of Wheeling	Wheeling Park Commission	City of Huntington	City of Charleston
Is the Written Safety Program Enforced?	Yes, the program is enforced through training and constant awareness initiatives. Use of progressive discipline may be used if deemed appropriate	Yes, through training and monitoring by management; along with supervisor observance and enforcement	Yes. The City of Huntington enforces the Employee Rules and Regulations which outlines progressive discipline for violations	Yes, progressive discipline per civil code
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksites?	Yes, on bulletin boards	Yes	No, however a copy of the safety manual is on field at each location	Yes, various risk management materials are currently posted
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes	Senior Management continually evaluates and discussions take place at bi-weekly meetings. The Safety committee is comprised of there senior mangers and six hourly employees. The committee takes preventative action, as well as post claim action to prevent injuries from occurring. Claims data is maintained and sent to the chief executive officer and vice-president of administration weekly	Yes	Yes, although currently the annual timeframe has expired
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes, the city conducts random, post-accident and reasonable suspicion drug and alcohol testing	Yes, employees are subject to disciplinary action up to and including discharge for violations of this policy and are subject to testing for cause.	Yes, testing is performed pre-employment; randomly; post-accident and for reasonable suspicion	Yes, the policy is based on DOT compliance
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	In 2009 all City of Wheeling employees received a 3% pay increase due to an partially funded by the savings in the workers' comp and general liability insurance programs which is directly linked to the success of the safety and loss initiatives	No	No, however a copy of the safety manual is on field at each location	No
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	Yes	Yes	Yes, progressive discipline for violations is enforced in the Employee Rules and Regulations	Yes, per civil code

Company	City of Wheeling	Wheeling Park Commission	City of Huntington	City of Charleston
Do you have Safety Committees at the Workplace that Meet Regularly?	A management committee consisting of a supervisor from each of the 6 public works divisions, the public works director and the safety coordinator meet at least monthly. The safety coordinator meets with each division employee group at least monthly	Yes, bi-weekly	No, however the Huntington Fire and Police Departments have designated employees to address safety issues	Yes, the committee meets monthly
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes, a full-time Safety Coordinator	There are three senior management employees who share responsibility of the Commissioner's safety program, one of which is the chairperson of the safety committee	Yes, however the position of Safety and Benefits Coordinator is slated for elimination effective June 30, 2010 due to budgetary constraints. In the even this occurs, the City is planning to utilize a consultant for its safety needs	Yes, a safety coordinator for non uniform departments
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Yes, conducted formally on an annual basis and informally on an ongoing basis	Yes, and it varies from daily to semi-annually when they are performed.	Yes, Surveys are completed on an annual basis	Yes. Bi-monthly walk thru inspections are performed by the safety committee
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	Yes, the Safety Coordinator meets with department heads to address any findings and determines corrective action and timeframes	Yes, the chairperson of the safety committee, director of lodge and cottage maintenance, monitors the completion of issues to be addressed by disseminating the information to the appropriate personnel, along with the director of human resources and the director of planning. They are at times addressed during safety meetings as well	Yes. The issues that need to be addressed are furnished to the various department heads for corrective action, and a follow-up is conducted by the Safety and Benefits Coordinator	Not answered
Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?	Yes, if an employee (non-uniformed) is injured, the City of Wheeling will return an injured employee to modified or alternative work (transitional duties) as soon after an injury as possible. The Human Resource Director oversees the program and works directly with the department heads, Comp Services and the injured employee to determine available modified duty work and arrange return-to-work duties	There is a formal and consistent program under the human resources director. The Human Resource Director oversees the program and works directly with the department heads, Comp Services and the injured employee to determine available modified duty work and arrange return-to-work duties	Yes. The Fire and Police Departments have limited light-duty policies in place for civil service employees.	Yes, the RTW program is found in the City's Risk Management Manual. Both the City's Workers Compensation Coordinator & Department Head evaluate the worker's case for possible return

Company	City of Wheeling	Wheeling Park Commission	City of Huntington	City of Charleston
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	In 2009 all City of Wheeling employees received a 3% pay increase due to an partially funded by the savings in the workers' comp and general liability insurance programs which is directly linked to the success of the safety and loss initiatives, which includes the return-to-work program	No	No	No
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	Yes	Yes	Yes	Yes
Is All Training Mandatory?	Yes	Yes	Yes	Yes
Are Written Manuals Used? If so, Please Describe.	Various forms of training tools and resources are used including manuals, handouts, videos, webinars, etc. depending on the specific program being conducted	Yes, if it is internal training, the training manager is responsible for creating the training module with a variety of resources available. The training often includes videos, role playing and tests appropriate for the specific training module	Yes. The city's safety manual is reviewed in the initial training along with the use of safety videos	Yes. The City's safety manual is utilized as one source for training compliance
Please Describe the Type and Length of Initial Training to New Employees	New employees complete safety orientation that normally lasts 1-2 hours. Initial safety training then occurs in departments/divisions where they are working in regards to their job activities and potential workplace hazards. Length of on-the-job training varies according to the workplace hazard.	New employees attend an orientation in human resources prior to commencing their first day of work. The training is then comprised of ten components including a safety quiz	The initial classroom training is approximately 4 hours. The new employee is then placed with experienced workers for on-the-job training with direction from the supervisor.	An approximately 3 hour classroom safety general orientation is conducted for new hires, covering an array of hazards and precautionary measures including PPE use. The employee is then placed with the work crew and supervisor for on-the-job training and monitoring

Company	City of Wheeling	Wheeling Park Commission	City of Huntington	City of Charleston
Please Describe the Type and Length of Initial Training to Current Employees	Industry specific training occurs throughout the year. The Safety Coordinator in 2009 presented 62 safety training meetings covering over 40 different safety topics. All applicable department employees attend these safety programs. In addition, specialized training and refresher training in the Fire and Police Departments are ongoing on a regular and required basis	Drivers Training - 1 hour; Food Service Worker Training - 1 hour; First Aid/CPR/AED - 3 to 4 hours; Fire Extinguisher - 1 1/2 hours; Workplace Safety - 1 1/2 hours; Harassment - 1 hour; Chain Saw - 3 hours; and Horticulture Pesticide 1 1/2 hours.	Monthly safety meetings address all phases of safety, such as proper lifting, defensive driving, etc.	Monthly safety meetings are conducted which entail both classroom and on-the-job retraining, covering the associated hazards for both employee and equipment
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Appropriate PPE is provided and the Safety Coordinator and department heads share oversight responsibility for the program	Yes, management and supervisors monitor continually	Yes	Yes, per OSHA standard
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes. Regular inspection and maintenance is performed by the maintenance staff at each facility and the process is overseen by the applicable building manager	Yes, managers and maintenance monitor through visuals and scheduled reviews	Yes	Yes, monthly inspections are conducted
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Yes. The department heads at each facility are responsible for the safe maintenance and operation of all machines in their areas of responsibility. The Safety Coordinator conducts period safety inspections and machine guarding training to ensure compliance	Supervisors, managers monitor and maintain compliance. The members of the safety committee monitor compliance	Yes, machines are included as part of the safety audits conducted by the Safety and Benefits Coordinator	Yes, these items are addressed by the Safety Committee during bi-monthly walk thru inspections
Is there a Program in Place to Address Emergency Preparedness?	Yes	Yes	Yes	Yes
Have you Been Certified by an International Standards Organization?	The Wheeling Fire Dept is certified by the Insurance Services Offices and is currently rated as a 3	No	No	No

Company	City of Wheeling	Wheeling Park Commission	City of Huntington	City of Charleston
Do you Undergo any Regular Internal or External Safety Audits?	Yes. Safety audits are conducted monthly by the Safety Coordinator. The Human Resources Director and department heads conduct informal walk-through safety inspections on a regular basis. Cincinnati Insurance Company, the cities' loss control insurance carrier, conducts formal safety audits, the last in 2007 and is scheduled another for 2010.	yes, internally it varies from daily to semi-annually. Externally the OIC Safety and Loss Control Specialist and Travelers Insurance Liability Insurance Assessment have conducted audits	Yes. The city is audited by a representative of the Insurance Commissioner's office on an annual basis	Yes, External safety audits are conducted by the City's insurance carrier, Commercial Insurance Services
Contact Person	David J. Denham Human Resources Director City of Wheeling	Karen S. Hess Director/HR Wheeling Park Commission	Bill Perdue Safety and Benefits Coordinator City of Huntington	Tim Campbell Safety Coordinator City of Charleston

MUNICIPALITIES - TAB 2

Self-Insured Employers Safety Study Municipalities Continued

Company	City of Parkersburg	City of Fairmont	Fairmont City Police Department	City of Fairmont Fire Dept.
Approximate Number of WV Employees	300 employees	Not answered	40 employees	41 employees
Is there a Written Safety and Loss Program for Employees in Place?	Not at this time	Yes	No	All written safety issues are addressed through general orders, contracts and personnel policies
Major Components of the Program	N/A	Safety training and ways to reduce injures in the workplace	N/A	Mostly safety issues concerning vehicle and boat operations, fire ground operations and manpower
Top 3 to 5 Programs in Place to Achieve Compliance	N/A	1. Annual CPR 2. Annual Chemical Safety 3. Annual Confined Space Exercise with Rescue Squad	N/A	1. General orders on cell phone usage 2. Driving policies 3. Wearing of high visibility vests 4. Boat Operations 5. Seat Belts 6. Backing Vehicles
Is the Written Safety Program Enforced?	Only the safety committee charter, which has just been developed to help enhance the city's safety.	No	No	Any non-compliance can be punishable by written reprimands, non paid time of work, reduction in rank or dismissal
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes within all offsite shops	Yes	No	All are posted in each fire station and the fire chief's office
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Not at this time	Yes	No	Fire Chief and shift officers meet as necessary to review, upgrade or add as necessary
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes	Yes	Yes, there is a policy on the use of intoxicants	New hires are required to drug test but not annually or on demand

Company	City of Parkersburg	City of Fairmont	Fairmont City Police Department	City of Fairmont Fire Dept.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	No incentives are provided to any City of Parkersburg employee	Lunch and Learns	None	No
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	Yes	Yes	No	Yes
Do you have Safety Committees at the Workplace that Meet Regularly?	It has just been developed	Yes, monthly	No	No
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	No	No	No	All officers oversee the safety of their respective shifts and the training officer assumes the role of safety officer on fire ground
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Yes, completed in June 2008	No	No	No
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	Safety Committee will be addressing survey results	N/A	N/A	N/A
Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?	Yes, the return to work program is coordinated with the Personnel Director and the Workers' Compensation TPA – Wells Fargo	No	No	If an injury occurs on the job, a doctor's slip allowing them to return to work full duty is required
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	No	No	No	No
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	Trainings provided are workplace specific, based on employee functions. The fire and policy departments have the most thorough trainings with full time staff assigned as training officers	Yes	No	Yes, fire service related training

Company	City of Parkersburg	City of Fairmont	Fairmont City Police Department	City of Fairmont Fire Dept.
Is All Training Mandatory?	Yes	Yes	N/A	Yes
Are Written Manuals Used? If so, Please Describe.	Each department has their own training-some written, others hands-on, on-the-job	Sometimes	N/A	Used in certified classes
Please Describe the Type and Length of Initial Training to New Employees	Varies by department	Safety is taught fulltime. Also teach chemical storage, methane monitored, shoring and trenching	N/A	All new hires are required under state law to complete a 6000 hour training program by state code to be completed over a 3 year period
Please Describe the Type and Length of Initial Training to Current Employees	Varies by department	Annual chemical training	N/A	Firefighters receive continuous training throughout their careers
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	The City of Parkersburg provides all necessary PPE to employees who are exposed to potential hazards. Department heads regularly communicate to employees regarding the need for replacement and use	Yes	Yes, although not regularly inspected to ensure proper utilization	Yes
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes, the maintenance department/buildings & grounds regularly inspect emergency lighting in all buildings	Yes	Yes, although not regularly inspected to ensure it is properly maintained	Yes
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Only within individual departments; no formal program in place other than the equipment that there are maintenance agreements on	Yes, 2 year inspections of monitoring equipment	Yes, there is an officer take home vehicle policy	N/A
Is there a Program in Place to Address Emergency Preparedness?	The city serves as the secondary 911 center and are members of the local emergency planning commission. Internally there are fire evacuation signs posted in all departments and buildings	Chemtrec program. If there is an emergency, they are called and they call all emergency management contacts. Gas leak the area is secured and 911 called	No	N/A

Company	City of Parkersburg	City of Fairmont	Fairmont City Police Department	City of Fairmont Fire Dept.
Have you Been Certified by an International Standards Organization?	Yes, and have a current rating of 4. Are awaiting ISO to do analysis to move to a 3	No	No	ISO rated
Do you Undergo any Regular Internal or External Safety Audits?	The City of Parkersburg underwent a complete audit in June 2008. The newly created safety committee will do audits monthly within each department	Internal by the safety committee and externally by their liability insurance company annually.	No	No
Contact Person	Susan Bayles Personnel Director City of Parkersburg	Unknown	Chief Kelly Moran Fairmont City Police Dept	Chief Roger L. Wilson City of Fairmont Fire Dept

RETAIL

RETAIL

TAB 1:

Kmart Corporation

Dolgencorp, Inc.

Family Dollar Stores of West Virginia, Inc.

Wal-Mart Associates, Inc.

TA Operating LLC

TAB 2:

The Bon-Ton Stores, Incorporated

Wendy's/Arby's Group, Inc.

CBOCS, Inc. (Cracker Barrel)

Kroger Limited Partnership

Guardian Glass Company

TAB 3:

Food Lion, LLC; Delhaize America, LLC

Sears Roebuck & Co.

Lowe's Home Centers, Inc.

Macy's Retail Holdings, Inc.

Elder Beerman

RETAIL - TAB 1

Self-Insured Employers Safety Study Retail

Company	Kmart Corporation	Dolgencorp, Inc.	Family Dollar Stores of West Virginia, Inc.	Wal-Mart Associates, Inc.	TA Operating LLC
Approximate Number of WV Employees	1375 employees	1344 employees	637 employees		129 employees
Is there a Written Safety and Loss Program for Employees in Place?	Yes	Yes	Yes.	Yes. The Safety Resource Manual. Although we do not have a written program for dust or noise, there is basic information provided in the PPE section of the Safety Resource Manual. We monitor or test when/if we believe there is a potential problem.	Yes. Written Program.
Major Components of the Program	All OSHA regulatory standards that apply to the units in WVA, including asbestos control, blood borne pathogens, electrical safety, MMHE, Fire Prevention, hazard communication, first aid, recordkeeping, safety teams, etc.	Employee safety requirements, best practices, requirements for a safe and healthful work environment, regulations, compliance, expectations.	Fire Safety, Blood borne Pathogens, Electrical Safety, Hazard Communication, PPE, Safe Lifting, Stacking Merchandise, Store Housekeeping, Use equipment safely (safety cutters, ladders), Handling Accidents, Recall	Associate Access to information; associate accident review form; automotive batteries; back belt guidelines; baler usage; blood borne pathogens; box cutter; cal OSHA; Ergonomics; evacuation guidelines; eye wash station; facility-based sprinkler test; fire extinguishers and suppression systems; floor care; hazard communications; heat related illness information; helium tank guidelines; hot works procedures; ladder safety; lockout tagout process; OSHA 300 Log; People Greeter; PPE; Poison control; pool chemicals; power equipment; powered propane buffer; retaitainment; rooftop guidelines; safe electrical work practices; safe lifting; safe stocking guidelines; safety binder; safety feedback form; safety program; safety team responsibilities; slip, trip, fall guidelines; spill absorbent program; trash compactor.	Employees are provided with a safety handbook and then have various sources available and monthly meetings to discuss safety. Have many different type of employees that each have their own specific safety hazards but in general the programs include things such as ergonomics, PPE, proper housekeeping and hazard communications/chemicals. Each employee is also required to watch a safety DVD and take a test on a yearly basis.

Company	Kmart Corporation	DolgenCorp, Inc.	Family Dollar Stores of West Virginia, Inc.	Wal-Mart Associates, Inc.	TA Operating LLC
Top 3 to 5 Programs in Place to Achieve Compliance	1. Hazard Communication 2. MMHE 3. Blood borne Pathogens 4. Safety Teams (meet on monthly basis to review program) 5. Action Teams (focus on specific safety issues)	1. Material Handling 2. Box Cutter 3. Equipment Handling	1. CARE Calendar (general housekeeping); 2. Accident Reporting; 3. TEAM Safety Program; 4. Blood borne Pathogen; 5. Hazard Communication	1. Safety Action Plans (created to focus on areas of Safety); 2. Safety Teams (this is also incorporated in a WM Policy SA-03); 3. Weekly Safety Playbook Topics (Focus on key areas of areas of Safety and communicated in meetings)	1. Ergonomics (lift properly); 2. PPE; 3. Housekeeping (wet floor signs, etc.); 4. hazard communication (labeling of chemicals)
Is the Written Safety Program Enforced?	Yes, all employees are provided information on the safety rules and associated enforcement during orientation. Throughout the year, employees are trained on select safety rules. Enforcement is a joint effort between the employee's supervisor, Human Resources, and the Employee Services Organization.	Yes. Electronic Signature tracking of monthly training with exception reporting to field management teams, progressive counseling process and tracking for employee accountability.	Yes, through the CARE program. The CARE Program has everyday action items that must be completed by the manager on duty. This includes inspecting equipment to ensure it is safe, checking that aisles are clear, mats lay flat, etc. This program identifies possible hazards throughout the store and requires the manager to evaluate the condition of their store. All hazards found must be corrected immediately. In addition there is a monthly safety tip that must be reviewed with all Team Members. The District Manager, when visiting the store reviews the CARE Program to ensure all items have been completed.	Yes. Workplace Safety Policy PD-35	Policies are enforced. If an employee violates a policy we follow a 4 step disciplinary program.
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes, all units have a Safety Communication board as well as a Labor board with required information.	Yes. A "Safety Communication" poster is at each store location. Monthly safety training is incorporated into this poster as well as compliance information, emergency evacuation information, store map and evacuation assembly areas.	Yes. The CARE Program is kept on a clipboard at the front register area for all Team Members to review. The WV Self Insurance Program is posted on our HR board in the break area of the store.	Yes. Safety topics are posted on the Safety Awareness Center/Information Board which are in visible locations (near time clock). The safety awareness Center and Safety Team Information Center is used to communicate safety information to associates including the store's accident performance, current incentive plan, notes from the last safety meeting, accident prevention tips, etc.	on the bulletin board we have who the safety committee rep is, our monthly safety committee meeting notes, all regulatory posters, an emergency procedures guide and an emergency telephone call list. Also in the general area is a first aid kit, blood borne pathogen kit, MSDS station and required PPE.

Company	Kmart Corporation	Dolgencorp, Inc.	Family Dollar Stores of West Virginia, Inc.	Wal-Mart Associates, Inc.	TA Operating LLC
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes.	Yes. Weekly reporting to senior management and goal tracking quarterly is completed for all divisions of the company.	The Risk Management Team constantly reviews the safety and loss program to ensure the program is effective, sustainable and continually improving. In addition, Risk Management partners quarterly with Senior Management to review safety and loss policies and procedures in the National Safety Advisory Board.	Safety Team Project Managers at Home Office review programs and update as needed. Safety Teams at store level, although not senior management, meet yearly to review accident trends and create Safety Action Plans to improve in Safety areas where addition focus may be needed.	Yes. Senior Management at our home office which is made up of leaders from each department meet monthly to discuss safety issues and how to improve. Reports with safety stats are generated monthly and distributed to all levels of management.
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes. Sears Drug Free Workplace--Sears is committed to the health, safety, and welfare of our employees, their families, and customers. However, abuse of drugs and alcohol continues to be a problem in our communities and in the workplace. This abuse decreases productivity and increases accidents, absenteeism, medical disability costs, and thefts of company property by employees . . . employees may be asked to take a drug and/or alcohol test following an on-the-job accident or when management has reason to believe employees are using or abusing drugs or alcohol in violation of Company policy. Additionally, employees in positions designated as safety-sensitive are subject to random testing, Employees who refuse to be tested or who tamper with a drug test will be discharged	Yes. It is standard operating procedure.	They use drug testing to help ensure that they can provide a safe working environment for all Team Members. All applicants, where allowed by state law, are drug tested as part of Pre-Employment Screening process.	Yes. Alcohol and Drug Abuse Policy PD-16.	Yes. Do random drug testing for all employees. We also require a post accident drug test for any work related incident requiring medical attention.

Company	Kmart Corporation	DolgenCorp, Inc.	Family Dollar Stores of West Virginia, Inc.	Wal-Mart Associates, Inc.	TA Operating LLC
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	No, there are no incentives for implementing the safety program. Store employees may receive a recognition lunch or congratulatory remark from their senior leaders for achieving outstanding safety performance.	Yes. Safety is a metric all management employees have baked into their goals each year. Performance bonuses are tied to safety metrics.	They have recently implemented an incentive program to all stores. Field Management gives out "Thank-You" cards to Team Members who have gone over and above the call of duty. This can include safety and loss items. Once a Team Member receives 5 "Thank-You" cards, a gift certificate is issued to the Team Member.	Stores have "Safety Incentive Programs" which encourage/motivate associates to achieve a great goal. Rewards/prizes are provided based off accident free days. Although the plans must follow the requirements of the Corporate Prizes and Awards Policy PD-72, examples include snacks, mugs, and store-wide cookouts for all associates, etc.	The number of accidents a manager has in the year is on their review. The department also gets charged a dollar amount for each accident. If the entire site goes accident free a credit is given.
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	Yes	Yes	No.	There are Corporate Policies that provide guidance on progressive disciplinary actions (PD-30) and specific to Safety is the Workplace Safety Policies (for management and hourly associates) PD-35.	Yes, use a progressive discipline program for safety violations.
Do you have Safety Committees at the Workplace that Meet Regularly?	Yes	Yes. They are Safety Captains that are responsible to their respective district. The Safety Captains are required to be at each store location under their responsibility twice monthly to review any incidents to employees or customers; review the accident investigation for any incidents that occurred since their last store visit; ensure the monthly training is taking place with signatures by each employee and speaking with store employees to ensure understanding of the monthly safety topic; review the quarterly store manager store audit to ensure compliance with company policies and governmental regulations are being adhered to.	Yes. The stores have monthly safety meetings on topics such as cleaning spills, ladder safety, etc. that are included in the CARE Calendar Program. At corporate, they have a National Safety Advisory Board that consists of Senior Management and Risk Management TEAM Members. this committee meets quarterly.	Yes. Safety Teams.	Yes. Have a safety committee at each site which meets monthly. A representative from each area of the site then takes the information back to their respective employees.

Company	Kmart Corporation	Dolgencorp, Inc.	Family Dollar Stores of West Virginia, Inc.	Wal-Mart Associates, Inc.	TA Operating LLC
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes	Yes- Rick Sumner	Yes.	There are also Regional Safety Managers and Market Asset Protection Managers that have in-depth involvement in Safety initiatives and programs. Each safety team has a management team sponsor and a safety team leader. Often the APC in the store is the management team sponsor. However, the associates in the store that have involvement in the program are not "dedicated" solely to the program. Each of them have other job responsibilities and can only commit a portion/reasonable amount of time to the Safety Program.	Have 2 people whose dedicated job is solely to oversee the safety programs.
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Yes, the work areas are evaluated monthly.	Quarterly Store Manager Audits are completed for each store location.	Safety audits are completed in various stores throughout the year by the Environmental Health & Safety Team. These safety audits evaluate areas in the stores such as sales floors, mop sink, Restrooms, stockroom, outdoors, coolers, equipment, fire safety, electrical safety and behavior items. The store manager evaluates the store based on the CARE program. One or two items are listed as Everyday Action Items on each calendar day. The manager must check these areas in addition to the Action Items that must be checked 3 times a day.	Yes. Call it job safety analysis. Sections are updated as needed on an on-going basis	Each department within an individual site completes a safety checklist on a monthly basis and is brought to the safety committee for discussion and correction.
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	The survey results are entered in a data base which generates action items for addressing issues. The store employees also have the ability to create action items unique to their store to address these issues.	Yes For maintenance issues; a tracking system is in place for ensuring repairs are completed timely. The district Safety Captains review the audits to ensure all issues are addressed and review any noted issues for timely completion.	above	Yes, we implement and/or change or PPE requirements or look to see if the problem can be engineered out first.	issues identified are put into a database and then the expectation is they are corrected as soon as possible and closed out on the database. Senior management reviews this database.

Company	Kmart Corporation	Dolgencorp, Inc.	Family Dollar Stores of West Virginia, Inc.	Wal-Mart Associates, Inc.	TA Operating LLC
<p>Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?</p>	<p>Yes. Executive Summary of the Return to Work Program. Each unit is required to implement the SHC Return to Work Program. The RTW Program is an organized method of bringing employees back to work, within medical restrictions, after an on-the-job injury or illness. Promptly returning an employee to the work environment has been proven to speed the recovery process and reduce related medical and compensation costs. There are three main issues when returning an employee to work: (1) Promote empathy for the employee; (2) communicate with the employee consistently; (3) Inform the employee of his/her return to work options. The goal of the SHC RTW Program is to make alternate/modified duty available to return an employee injured on the job to work as soon as possible. Showing empathy for the employee, providing consistent communication, and clearly communicating RTW options will help ensure a successful RTW</p>	<p>Yes. A labor hour distribution process is in place for store with employees on restricted duty to have their labor hours hit a corporate cost center vs. hitting the stores profit and loss statement. Yes. The RTW Program or Interim Duty Policy for work related injuries is a major focus to the company in keeping our severity rate below the industry average and reducing indemnity payments for compensation claims.</p>	<p>At this point, we don't have a "written" RTW program, although we do have a rough draft of a new Managed Temporary Transitional Duty program. WE do not have a RTW manager at each facility. We currently have Casualty Claim Specialists here at the corporate office that have specific responsibilities including oversight of our TPA and coordinating RTW opportunities at our stores with District Managers. they receive temporary light duty restrictions from our TPA or nurse managers and communicate them to the store supervisors and/or District Managers to explore the potential for a temporary transitional RTW opportunity. Our Casualty Claim Specialists track the team members when they are in this program to make sure they are progressing with their recovery and that RTW position is in a safe and therapeutic environment that will assist with their recovery.</p>	<p>I don't believe there is a policy specific to TAD (Temporary Alternative Duty) but there is documentation specific to the program. This may be addressed in the LOA policies -- Policy PD-58 covers some areas of accommodations. There are numerous documents available that provide guidelines on the TAD program. Available on the CMI page. Utilization of this program is the managers' responsibility.</p>	<p>Yes we have a very extensive RTW Program. Managers are trained to look at the restrictions given by a doctor and trained on how to identify a job anywhere within the site to keep that person at work and financial whole. It is used extensively. Lost time accidents are tracked in great detail to ensure the modified duty program is used.</p>
<p>Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?</p>	<p>Yes, there is a lost work day charge implemented for each day any injured employee misses time from work. The longer the time missed, the more severe the charge.</p>	<p>For management, the labor hours are removed from the stores P&L and for employees, they do not have their salaries reduced by collection wage replacement benefits that are below their average weekly income.</p>	<p>In order to assist the store in providing these opportunities, we do offer temporary payroll assistance to the store when that team member returns to work. The temporary assistance is stopped when the team member reaches full duty and/or when his/her restrictions are no longer temporary.</p>	<p>No.</p>	<p>There is a greater penalty on a review for management that has lost time accidents.</p>

Company	Kmart Corporation	DolgenCorp, Inc.	Family Dollar Stores of West Virginia, Inc.	Wal-Mart Associates, Inc.	TA Operating LLC
<p>Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?</p>	<p>Yes.</p>	<p>Yes. Receive safety orientation video and handbook. Managers use a safety facilitator guide. Management employees are trained via the field training managers.</p>	<p>The TEAM program is the tool that we use for initial training as well as a resource to be used throughout the year. Currently we have hard copies of the TEAM Manual that is kept in a notebook in the manager's office. WE are in the process of launching the TEAM series accessible online. All new Team Members will be required to complete the Team series including the Safety Modules and a safety assessment within their first weeks with the company. Yes. Fire Safety, blood borne Pathogens, Electrical Safety, Hazard Communication, PPE, Safe Lifting, Stacking Merchandise, Store Housekeeping, Use equipment safely (safety cutters, ladders), Handling Accidents, Recalls</p>	<p>There is also training provided in the orientation process. Associate New Hire Checklist-- there is both a general checklist and a department specific checklist. There are emergency Procedure flipcharts located throughout the facility. There is a training DVD that should be shown during Orientation that details the emergency procedures.</p>	<p>Every employee watches a DVD on safety. Specific to work area. 30 minutes long and include many topics including electrical hazards, ergonomics, knife safety, parking lot safety, strangers-violence, hazard communication, PPE, fire safety, machine guarding, lockout/tagout, forklift, accident reporting and more job specific items. They then must take a test on these items. Recorded in computer system so that we know that everyone has done it. They are required to retake this yearly. The managers take this job specific DVD as well but then they also have a management DVD which goes over management's responsibility in safety that also has a test. Then in addition all new general managers must attend an in person safety class to review accident reporting and hazard recognition. all assistant managers and shift leads attend a 2 hour webinar to review the same. All managers are required to retake the in-person or webinar every 2 years.</p>
<p>Is All Training Mandatory?</p>	<p>Yes</p>	<p>Yes</p>	<p>Once the online version is pushed it will be mandatory and we will be able to track compliance.</p>	<p>Yes. Orientation and the Associate New Hire checklists are required to be filled out.</p>	<p>Yes.</p>
<p>Are Written Manuals Used? If so, Please Describe.</p>	<p>Training is conducted either using an online system or using written documentation such as a safety talk.</p>	<p>Yes</p>	<p>Yes.</p>	<p>There are certain positions/job functions that have written training manuals, such as the PLE (powered lifting equipment) guide. Some of the responsibilities that are included in certain job functions may require/reference the use of the reading, understanding, and following the information provided in the manufacturer's training/owner's manual.</p>	<p>Yes.</p>

Company	Kmart Corporation	Dolgencorp, Inc.	Family Dollar Stores of West Virginia, Inc.	Wal-Mart Associates, Inc.	TA Operating LLC
<p>Please Describe the Type and Length of Initial Training to New Employees</p>	<p>General Safety Training orientation is required for all new employees. Then employees are trained on specific topics relating to their job duties. Training length is dependent on the topic being trained on. For example, Blood borne Pathogens Awareness training is approximately 15 minutes, whereas MMHE training is 4 hours.</p>	<p>An orientation video, store employee handbook and store manager review is conducted with each new employee. The video is 30 minutes with interactive pictures and a quiz. All training signatures are captured on the store computer. A score of 100% is required for completion.</p>	<p>Each month, we will have a section of the Team series that will be sent to all Team Members. All Team Members will have to complete the monthly safety module and complete and complete an assessment. Fire Safety, blood borne Pathogens, Electrical Safety, Hazard Communication, PPE, Safe Lifting, Stacking Merchandise, Store Housekeeping, Use equipment safely (safety cutters, ladders), Handling Accidents, Recalls</p>	<p>New Associate Orientation is designed to be an 8 hour program. Paperwork and Policy information are scattered throughout the day as they are relevant to the topic at the time. There is also the New Associate on-boarding process that is a learning plan consisting of a series of activities occurring over approximately the first 90 days after the new associate's start date. training addresses all workplace hazards applicable to the industry.</p>	<p>Every employee watches a DVD on safety. Specific to work area. 30 minutes long and include many topics including electrical hazards, ergonomics, knife safety, parking lot safety, strangers-violence, hazardous communication, PPE, fire safety, machine guarding, lockout/tagout, forklift, accident reporting and more job specific items. They then must take a test on these items. Recorded in computer system so that we know than everyone has done it.</p>
<p>Please Describe the Type and Length of Initial Training to Current Employees</p>	<p>Retraining is based on the job responsibilities of the employees. Each year Sears plans out the compliance and safety training that will be provided to the employees based on job tasks.</p>		<p>above</p>	<p>Policy PD-30 addresses retraining associates if performance or behavior fails to meet company expectations. Associate transfers into different areas of the store may require retraining if the associate lacks the certification required for the position. Training length and type depends on the particular situation and requirements for the job. Some CBL modules require an "annual refresher" and associates must review and take the course annually.</p>	<p>must take a test on these items. Recorded in computer system so that we know that everyone has done it. They are required to retake this yearly. The managers take this job specific DVD as well but then they also have a management DVD which goes over management's responsibility in safety that also has a test. Then in addition all new general managers must attend an in person safety class to review accident reporting and hazard recognition. all assistant managers and shift leads attend a 2 hour webinar to review the same. All managers are required to retake the in-person or webinar every 2 years. Last year was a full-day of in-person training for all our truck service managers and all multi-unit managers on even more detailed hazard recognition and OSHA standards.</p>

Company	Kmart Corporation	Dolgenercorp, Inc.	Family Dollar Stores of West Virginia, Inc.	Wal-Mart Associates, Inc.	TA Operating LLC
<p>Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?</p>	<p>Yes.</p>	<p>Yes. Pep's for our facilities are limited to gloves for Blood borne Pathogen clean-up procedures.</p>	<p>Yes. PPE is provided to Team members if they need to protect their hands, eyes, and torso when job conditions require additional protection from cuts and chemicals. PPE can be obtained from the retail shelves and SKU's are provided as to what PPE is acceptable. In addition, Blood borne Pathogen kits are distributed to all the stores. These kits include a gown, gloves, face mask, and eye shield.</p>	<p>Yes. PPE is available throughout the store and for associates in the job positions that require it. Safety Team Members have rotating weekly functions/tasks that they are required to do which incorporates inspections of various areas/equipments in/outside their store. In addition, there are often Compliance and AP checklists that must be completed and this can be done through Asset Protection Associates or a Manager, depending on the task and what is required.</p>	<p>Yes, we supply the correct PPE. We inspect the availability and condition of the equipment in our monthly safety checklists.</p>
<p>Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?</p>	<p>Yes.</p>	<p>Yes. Quarterly Store Manager Safety Audits.</p>	<p>Yes. The CARE Program has an action item list that is to be completed 3 times a day by the manager on duty. Also discussed in Fire Safety rules.</p>	<p>Yes. this is part of the duties performed by the Safety Team members.</p>	<p>Yes, have appropriate access and egress in the facility including emergency lighting. These items are also on the monthly safety inspection and we have an outside company recheck the emergency lighting, exit signs, fire extinguishers, etc. on a yearly basis.</p>
<p>Are the Machines Properly Inspected, Guarded, Maintained and Operated?</p>	<p>Yes. There are monthly and annual safety inspections that review equipment in the locations.</p>	<p>The machines in our facilities include: computers; cash registers, refrigerators, and freezers which are maintained by the companies Facility Maintenance group. Processes and practices in place for reporting and tracking machine issues.</p>	<p>We have policies in place for electrical panel maintenance and safety such as doors must be closed, 36 inch clearance around panels, all circuits are covered and the panel must be labeled. If a store has a compactor, then all Team Members must be trained on compactor use and how to ensure that guards are in place.</p>	<p>Pre-op checklists are in place where required. No requirements to inspect office equipment.</p>	<p>all machines are inspected and guarded. Again on the monthly checklist the specific equipment in each department is listed to check. IN addition the multi-unit managers have checklists to review these items on a quarterly basis. Have a lockout/tagout kit and training.</p>

Company	Kmart Corporation	Dolgenercorp, Inc.	Family Dollar Stores of West Virginia, Inc.	Wal-Mart Associates, Inc.	TA Operating LLC
Is there a Program in Place to Address Emergency Preparedness?	Yes. The Emergency Planning an response Program provides information on facility emergency planning for severe weather, act of nature such as fire, loss of power, hurricane/tornado, flooding, wildfires, etc.	Emergency preparedness for robberies, structure issues, weather and natural disasters	Yes. The fire safety section of the TEAM safety series discusses emergency evacuation. Team members are encouraged to complete an evacuation drill yearly. In addition, the back of the CARE program has Emergency Reference Items listed. Discusses inclement weather.	Emergency Procedures Manual and Emergency Procedures flipchart. The EP manual is much more in-depth guide to various emergency situations, and the flipcharts are quick-reference tool designed with short action bullet points based on the individual emergency. These flipcharts are posted in numerous locations throughout the facility.	have specific emergency guidelines and charts that hang on the wall. Have a safety committee topic each month and this month is emergency preparedness.
Have you Been Certified by an International Standards Organization?	No.	No.	No.	Unsure	No.
Do you Undergo any Regular Internal or External Safety Audits?	Yes. The company's Internal Audit department conducts regular safety audits in the locations each year.	Quarterly Store Manager Safety Audits are completed at every store location. The safety captains review the audit quarterly and complete an additional audit. Externally, the safety department audits random locations and also Focus Stores (more than 2 incidents in a rolling time frame).	Yes. Internal Safety audits are completed in various stores throughout the year by the Environmental Health & Safety Department. The only external safety audits completed are regulatory inspections.	Yes, Compliance Audits are completed.	Each department does their monthly safety checklist. Multi-unit managers do their safety checklists on a quarterly basis. The safety department does unannounced safety inspections of our sites.
Contact Person	Holly Miranda 3333 Beverly Road; ALL-338A Hoffman Estates, IL 60179	Rick Sumner, Director Insurance & Safety, 100 Mission Ride, Goodlettsville, TN 37072	Lisa Glass, Environmental Health & Safety Specialist, Family Dollar Stores of West Virginia, Inc.; P. O. Box 1017, Charlotte, NC 28201	Laura Wynn, 702 SW 8th Street, Bentonville, AR 72716.	Julie Gerda, Manager of Safety, 24601 Center Ride Road, Westlake, OH 44145

RETAIL - TAB 2

Self-Insured Employers Safety Study Retail Continued

Company	The Bon-Ton Stores, Incorporated	Wendy's/Arby's Group, Inc.	CBOCS, Inc. (Cracker Barrel)	Kroger Limited Partnership	Guardian Glass Company
Approximate Number of WV Employees	(Same 384 as Elder Beerman)	1517 employees	1200 employees	5,022 employees	51 employees
Is there a Written Safety and Loss Program for Employees in Place?	Yes. Comprehensive program that includes emergency guidelines and procedures, OSHA standards, accident prevention, accident reporting and response, reporting a safety concern. It is all available on our company intranet site available to all employees. Because we are a retailer, noise and dust is not usually an issue; however, responding to customer accidents and illnesses are and that is covered in depth in our blood borne pathogens program.	Yes.	Yes.	Yes	Yes.
Major Components of the Program	includes emergency guidelines and procedures, OSHA standards, accident prevention, accident reporting and response, reporting a safety concern.	Hazard identification, hazard prevention, hazard correction, and employee protection are the primary components. The major areas of concern include injuries that result in cuts, burns, and back injuries (material handling and slips and falls.)	Extensive employee training and resource network. Operations, food safety, employee and guest safety, and management skills are some of the major topic areas.	Associate safety, customer safety and OSHA compliance	PPE, Housekeeping, Material Handling/Transport, Glass Handling, Ladders, Lifting, Removing and Installing Tools, Electrical, Fire, Security, Hazcom, Customer Safety, Overhead Storage, Vehicles and Driving, Personal Electronics, Grills, Emergency Action Plans, Restricted Work, Tobacco, Visual Observations, Reporting, Expectations.

Company	The Bon-Ton Stores, Incorporated	Wendy's/Arby's Group, Inc.	CBOCS, Inc. (Cracker Barrel)	Kroger Limited Partnership	Guardian Glass Company
Top 3 to 5 Programs in Place to Achieve Compliance	1. Monthly safety action team meeting that reviews the monthly self-inspection and accidents that occurred in the previous month. 2. A monthly self inspection; 3. OSHA standards including the Bloodborne pathogens standard, hazardous communication standard and the lockout/tagout standard; 4. Emergency procedures including evacuation, weather related emergencies and random threat; 5. Visual/display safety guidelines. Points 3-5 are monitored for compliance in monthly audits.	1. The Identification and correction of hazards through a safety audit program. 2. formal audits completed monthly. 3. all types of hazards addressed. 4. PPE program that addresses cut and burn injuries. Various types of PE is provided, employees are trained via an online course. Compliance is monitored by management. 5. Lifting injuries are addressed through a safety orientation and training program. Also through the use of posters that highlight proper lifting techniques and manager observations.	1. New hire orientation (general); 2. PAR (general safety toward specific jobs); 3. Employee training coordinator program (facilitates training process with management)	1. Store safety committees--each store has store safety committees that meet on a monthly basis to discuss different aspects of safety within each store and the division; 2. Observation program--each store safety committee member, along with store management, are continually observing safe behavior and address safety hazards within the store; 3. OSHA compliance--Kroger is engaged in complying with OSHA requirements and standards within our industry. Each store and safety committee is involved in OSHA compliance.	PPE, Glass Handling, Vehicles and Driving
Is the Written Safety Program Enforced?	Each location is required to submit monthly information regarding the safety audit and the monthly safety action meeting. This information is reviewed for accuracy and compliance.	Disciplinary action is taken as a course of action when policies are not followed. Monthly safety audits also ensure enforcement of program.	Yes. Enforced through day-to-day manager operations and employee evaluations.	Yes. It is enforced at a division and store level by observations by safety committee members, store management, and Kroger associates. Safety committees meet on a monthly basis to address any concerns/issues.	Yes. Each employee read and signed off to acknowledge and all new hires are taken through the program before starting in the workplace. Topics from this program are discussed throughout the year in safety meetings.
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Each location has an area that posts various elements of the safety program. The entire safety program is posted on the company intranet website which every associate has access to. Also, many of our safety policies and programs are in the associate handbook, which all new hirees are given.	Yes. Primary areas of concern are posted on the 60 seconds for safety poster. Monthly safety posters and discussion topics are also provided in all stores.	Yes. All state mandated information is posted for employees to review.	Yes, aspects and principals of the safety program are posted in each department of each store.	Yes.

Company	The Bon-Ton Stores, Incorporated	Wendy's/Arby's Group, Inc.	CBOCS, Inc. (Cracker Barrel)	Kroger Limited Partnership	Guardian Glass Company
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes. At the store level the safety team meets monthly to review safety in their particular building. Quarterly, a corporate safety group meets to review accident data and review the overall program. This consists of senior management of the company	Yes. Loss reports are reviewed on an ongoing basis and action plans are developed as needed for problem restaurants.	Yes. Safety programs, training, and loss data is reviewed on a regular basis.	Yes, Senior management at Kroger meet at least once annually to review the safety program and to address compliance, issues, and its effectiveness.	Yes.
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes. The policy states that if there is reasonable suspicion that an associate's performance is being impaired as a result of the use of controlled substance or alcohol, which may occur either on or off the job, the Company may require associates to undergo testing for alcohol and controlled substances. Where associates refuse such testing they will be subject to disciplinary action, up to and including termination.	We currently do not have a drug/alcohol testing program in place.	Yes. Drug-Free workplace and substance abuse policy.	Kroger has a written program concerning pre-employment and post-accident drug screenings. Use of alcohol, illegal substances or controlled substances without a prescription on company premises are not allowed. If there is suspicion of illegal drug or alcohol use, Kroger has the right to request a drug and alcohol screening.	Yes. Policy describes Guardian policy regarding alcohol and drug abuse on company time, and that employees have the right to work in an alcohol and drug free environment.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	No. However, accident prevention is part of loss prevention and management's responsibilities; in addition, loss prevention management has accident reduction on their annual review.	Contests are often held, with the claim free stores entered into drawings for assorted gift cards.	Yes. Employees are expected to follow all policies as part of their employment.	For every store that is accident free for a fiscal quarter, the store is given \$75 to celebrate the accident free days. Store associates are encouraged to become members of the STAR team and do take ownership of the safety program.	Yes. Safety awards are given to all employees in each location that has achieved zero incidents for the entire year, and awards increase in value as the years of zero incidents increases.
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	There is nothing specific to safety; however, there is a progressive disciplinary policy in place for violations of company policies, and safety would fall into that category.	Yes. This involves coaching, written warnings, final written warnings and termination.	No, we are an at-will employer.	Yes. Kroger has a progressive discipline policy to address violations of the safety and loss program.	Yes. All location managers are held accountable for the completion of safety meetings and failure to do so adversely affects their profitability bonuses and/or employment status. Employees are held accountable through disciplinary consultations and/or employment status.

Company	The Bon-Ton Stores, Incorporated	Wendy's/Arby's Group, Inc.	CBOCS, Inc. (Cracker Barrel)	Kroger Limited Partnership	Guardian Glass Company
Do you have Safety Committees at the Workplace that Meet Regularly?	Yes, it meets monthly, every month but the last quarter of the year.	Each store has a safety Marshall (rep.). This person assists store management with safety. The Marshall attends area safety meetings, and then presents the material at store meetings. The Marshall also conducts general safety audits and reviews with the store general manager.	Yes.	Yes, store safety committees meet at least once on a monthly basis.	Yes.
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	No, however, the Store Manager is ultimately responsible for safety within the building.	Yes. I am the region's safety manager. (Steve Kaplan)	No. We have many home office employees in risk management, loss prevention, human resources, and training involved with employee safety. Combined together, it is more than one FTE.	Yes, Kroger has a Division Safety Manager that is dedicated solely to Kroger's safety program.	Yes.
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	we do not conduct safety surveys for each area, however, we do a safety audit of the entire store monthly.	Yes. General safety audits are completed at least once a period. Audit content is updated as needed.	Yes. Numerous audits completed by a variety of company employees. Throughout the year.	Yes, facility inspections are completed at least every 28 days in conjunction with the store safety committee's monthly meeting.	Yes. Yearly.
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	The monthly audits are reviewed at the monthly safety action team meeting.	The general manager addresses any opportunities that have been identified. The District Manager ensures these are corrected by also reviewing the audits. The DM completes one general safety program audit himself each quarter as part of calibration process with the store.	Yes. Audit results are shared with the district managers and regional vice-presidents.	Yes.	Yes. Continuous improvements are made to address all aspects of job safety.

Company	The Bon-Ton Stores, Incorporated	Wendy's/Arby's Group, Inc.	CBOCS, Inc. (Cracker Barrel)	Kroger Limited Partnership	Guardian Glass Company
Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?	Bon-Ton has no written RTW program. It is Bon-Ton's policy to accommodate Modified/Light Duty RTW. This means that the company will work with the employee and their physician to provide temporary job duties which meet the documented physical restrictions. This is handled through the HR department at each store. Corporately, we have a WC administrator who conducts an annual audit and an annual claim review. WE also have a claims manager who oversees the activities of the WC administrator and litigation process.	A complete RTW policy is available highlighting all the positions within the restaurant. The program is available to physicians and claims adjusters in consultation with restaurant management. The program is coordinated through in-house claim adjusters in consultation with physicians and in store management.	a. Yes. Temporary, transitional duty work may not always be available to all employees. Sole discretion of Cracker Barrel. B. Yes	Yes. Kroger does have a written RTW program. Store management initiates the RTW process with the claim examiner. Kroger also has a corporate RTW Manager that oversees each division's RTW Program. It is an actively utilized program and is monitored corporately to evaluate its utilization.	Yes. WE utilize a job analysis report that we follow to conduct our RTW program. Each location has a manger htat works with the Risk Manager to determine restrictions, modified and/or light duty available at that location. It is based on restrictions and business need. Yes. This program is runa nd monitored by the Guardian Risk Manager
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	No, there are no specific incentives.	no.	The managers' incentive to use the RTW Program is created through our workers' compensation allocation system. Failure to return injured employees may result in a claim cost allocation to the store where the employee was injured.	No.	No.
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	WE provide various types of job safety training. All employees at the new hire orientation are given an overview of the safety program and the OSHA standards. Affected employees are given specific training on safe lifting, hazardous communication training, Bloodborne pathogens training and lockout/tagout training. this is done at the time of their initial assignment. Bloodborne is done annually. Twice a year all locations participate in an emergency preparedness drill where they are trained on what to do in an emergency. Our company has a random threat plan in place which deals with workplace violence. This is reviewed at each location annually.	Yes.	yes. See above safety topics	Yes, Kroger provides both computer-based and on the job training and retraining for all associates, including management. Such hazards include, but are not limited to: slips and falls, proper lifting techniques, food safety and handling, lockout/tagout procedures, etc.	yes. PPE, Housekeeping, Material Handling/Transport, Glass Handling, Ladders, Lifting, Removing and Installing Tools, Electrical, Fire, Security, Hazcom, Customer Safety, Overhead Storage, Vehicles and Driving, Personal Electronics, Grills, Emergency Action Plans, Restricted Work, Tobacco, Visual Observations, Reporting, Expectations.

Company	The Bon-Ton Stores, Incorporated	Wendy's/Arby's Group, Inc.	CBOCS, Inc. (Cracker Barrel)	Kroger Limited Partnership	Guardian Glass Company
Is All Training Mandatory?	Yes (OSHA). Evacuation training is complete for those who are present the day of the drill.	Yes.	Yes for most. Some depending upon job.	Yes.	Yes.
Are Written Manuals Used? If so, Please Describe.	We have written procedures on the company intranet website.	There are written policies that are reviewed, as well as online courses that every employee including managers must view and complete questionnaires.	Most training is on the e-learning platform.	Training includes safety modules that pertain and address workplace hazards applicable to the grocery store industry.	No. Powerpoint and handouts.
Please Describe the Type and Length of Initial Training to New Employees	Each newly hired associate participates in a new hire computer based training program. Within this training is a safety overview. Affected associates in any of the Oshawa standards have additional specific training that includes watching a DVD and in the case of Bloodborne must also take a written exam, and in the case of Lockout must also have hands on training. The length of the training varies depending on the training.	During orientation, the employee receives online training, review written safety documents, and on the job training with direct supervision. The training addresses all workplace hazards within the restaurant. This helps prevent cuts, burns, lifting and other identifiable hazards.	All newly hired employees are required to go through classroom, online and on the job training during the first 2 weeks of employment.	Training is done during the initial training period after hiring. Each training module of the training program varies, along with the type of safety training based on the applicable hazards associated with each specific department in which the associate will and may be working in.	Training is performed by review of company safety policies then on the job training supports these policies. All categories above-mentioned.
Please Describe the Type and Length of Initial Training to Current Employees	Retraining may consist of watching a safety DVD that generally is within 10 minutes of length. The annual retraining of Bloodborne would be approximately 20 minutes.	Each employee receives updated training each year. This covers all aspects of our business including but not limited to slip and fall prevention, burn and cut prevention, proper floor cleaning procedures, proper lifting, hazard communication program etc. This training is both online and through observation by management.	Retraining in the form of Workplace Safety Day 1 and 2 courses occurs after the employee has been with the company more than 30 days. Employees can elect to continue their training in the form of online classes. These courses combined with evaluations allow employees to progress through our employee training program.	Similar to new training.	Topics from the program are discussed throughout the year in bi-monthly safety meetings as meeting topics.
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Yes we do provide PPE for those associates that need it, such as gloves for Receiving and gloves and goggles for visual. There is no specific system in place to ensure they are utilizing the equipment.	Yes. As part of the daily responsibilities of the management team and safety Marshall, PPE is checked, washed, and replaced as needed.	Yes. Numerous audits are completed to ensure the equipment is used	PPE is provided to associates that might have exposure to workplace hazards in the area they are working. PPE may vary depending on the area where work may be performed, and is inspected by the store safety committee during facility inspections at least once every 28 days.	Yes. Topic of at least one yearly safety meeting.

Company	The Bon-Ton Stores, Incorporated	Wendy's/Arby's Group, Inc.	CBOCS, Inc. (Cracker Barrel)	Kroger Limited Partnership	Guardian Glass Company
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes, the majority of our stores have emergency lighting, access and egress is checked monthly and is documented on the safety audit. An outside company conducts an annual inspection of the lighting.	these items are regularly addressed during the general safety audit. Any lights that are identified as not working properly are repaired as needed.	Yes. Numerous audits are completed to ensure access and egress.	Yes. Kroger provides appropriate access and egress to the facility. System in place for regular inspection.	Yes. Topic of at least one yearly safety meeting and subject to yearly 5S internal inspections.
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	There are very few machines in our retail environment. Those that we do have are maintained in that specific department and there is generally one person within that area that would call for repair if it was not operating properly.	There is a safety preventative maintenance program in place that includes regular cleaning and minor repairs. Most repairs are done by a trained technician.	Yes. Numerous audits are completed to ensure machines are operated properly.	Yes, machines are properly inspected, guarded maintained and operated. Machines are inspected at least every 28 days by the store safety committee.	Yes. Topic of at least one yearly safety meeting and subject to yearly 5S internal inspections.
Is there a Program in Place to Address Emergency Preparedness?	Yes. Program and procedure in place for almost all foreseeable emergencies, such as fire, tornado, earthquake, hurricane, workplace violence, bomb threat, hold up, mail safety, and power failure to name a few.	Yes. Emergency Preparedness and evacuation procedures are reviewed annually and employees are instructed through their orientation and Safety training.	yes. Fire safety and emergency evacuations and preparedness.	yes, each store has a Store Evacuation Plan in place in case of emergency. Plans are available at each store and are maintained by store management.	Yes. Topic of at least one yearly safety meeting.
Have you Been Certified by an International Standards Organization?	No. However, accident prevention is part of loss prevention and management's responsibilities; in addition, loss prevention management has accident reduction on their annual review.	no.	NO, does not apply to restaurant industry.	No.	No.
Do you Undergo any Regular Internal or External Safety Audits?	Yes, each location is required to conduct a monthly safety audits. In addition, our insurance carrier and I conduct safety inspections at targeted locations throughout our company.	Internal Safety audits are performed monthly. External audits are completed quarterly by the district manager.	Yes. Numerous internal audits are completed and beginning May 1, 2010, we will have an external company audit as well.	Yes, Kroger has safety cultural assessments that are performed internally and have external safety audits performed by outside companies at least every 3 years.	Yes. Topic of at least one yearly safety meeting and subject to random 5S internal inspections.
Contact Person	Judy Rabin, Corporate Safety Director; 999 N. Elmhurst Rd., Mt. Prospect, IL 60056.	Steve Kaplan, 40 shaman Bled. #130, Naperville, Il. 60563	Rob Behnke, Director of Risk Management, 307 Hartmann Drive, Lebanon, TN 37087	Nathan Fraley, The Kroger Co., 1014 Vine Street, Cincinnati, OH 45202; (513) 762-4360 (direct).	Gene Nichols, 600Lakeview Plaza Blvd, Ste A, Worthington, OH 43085

RETAIL - TAB 3

Self-Insured Employers Safety Study Retail Continued

Company	Food Lion, LLC; Delhaize America, LLC	Sears Roebuck & Co.	Lowe's Home Centers, Inc.	Macy's Retail Holdings, Inc.	Elder Beerman
Approximate Number of WV Employees	828 employees	820 employees	1900 employees	465 employees	384 employees
Is there a Written Safety and Loss Program for Employees in Place?	Yes.	Yes	Yes.	Yes.	Yes. Comprehensive program that includes emergency guidelines and procedures, OSHA standards, accident prevention, accident reporting and response, reporting a safety concern. It is all available on our company intranet site available to all employees. Because we are a retailer, noise and dust is not usually an issue; however, responding to customer accidents and illnesses are and that is covered in0depth in our blood borne pathogens program.
Major Components of the Program	Computer Based Training (CBT), Hazardous Communication, Lockout/Tagout, Emergency Evacuation, Fire Suppression, Fire Extinguisher and Walking/Working Surfaces	All OSHA regulatory standards that apply to the units in WVA, including asbestos control, blood borne pathogens, electrical safety, MMHE, Fire Prevention, hazard communication, first aid, recordkeeping, safety teams, etc.	Comprehensive safety program which is shared with all employees based on their job function. Extensive training at on boarding and throughout every employee's career ensures employees are knowledgeable of the safety program. Includes list below and powered equipment use, counseling and corrective action for safety violations and general safety.	Bloodborne Pathogens, Hazard Communication, Fire extinguisher, emergency shutdown, emergency drills, Right to Know, Lockout/Tagout, First Aid/CPR, Cosmetics Safety Training, dock safety training	includes emergency guidelines and procedures, OSHA standards, accident prevention, accident reporting and response, reporting a safety concern.

Company	Food Lion, LLC; Delhaize America, LLC	Sears Roebuck & Co.	Lowe's Home Centers, Inc.	Macy's Retail Holdings, Inc.	Elder Beerman
Top 3 to 5 Programs in Place to Achieve Compliance	Computer Based Training (CBT), Hazardous Communication, Lockout/Tagout, Emergency Evacuation, Fire Suppression, Fire Extinguisher and Walking/Working Surfaces	1. Hazard Communication 2. MMHE 3. Blood borne Pathogens 4. Safety Teams (meet on monthly basis to review program) 5. Action Teams (focus on specific safety issues)	1. Hazcom; 2. PPE; 3. Exposure Control; 4. LOTO; 5. Hazmat (proper cleanup and disposal)	Orientation safety training; merchandise/material handling; housekeeping; elevator/escalator; ppe; hazard communication	1. Monthly safety action team meeting that reviews the monthly self-inspection and accidents that occurred in the previous month. 2. A monthly self inspection; 3. OSHA standards including the Bloodborne pathogens standard, hazardous communication standard and the lockout/tagout standard; 4. Emergency procedures including evacuation, weather related emergencies and random threat; 5. Visual/display safety guidelines. Points 3-5 are monitored for compliance in monthly audits.
Is the Written Safety Program Enforced?	yes. Enforced through retail management and policy	Yes, all employees are provided information on the safety rules and associated enforcement during orientation. Throughout the year, employees are trained on select safety rules. Enforcement is a joint effort between the employee's supervisor, Human Resources, and the Employee Services Organization.	Written safety program is enforced through a policy of counseling and Corrective Action which defines all safety violations as a Class A violation. In essence, employees violating a safety policy or procedure can be disciplined up to and including termination. Lowes management enforces the programs and internal auditors and corporate office employees inspect locations regularly.	Yes, it is enforced. Monthly electronic audits and onsite audits.	Each location is required to submit monthly information regarding the safety audit and the monthly safety action meeting. This information is reviewed for accuracy and compliance.
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes online. Store office. I.E.: Training aids, computer base training (CBT) materials	Yes, all units have a Safety Communication board as well as a Labor board with required information.	Our programs and principals are posted in several locations including an online portal. Employees are encouraged to view the online documentation as part of an engagement program call "Race for the Cup" where they can win prizes for participating.	Yes, the company's "Workplace safety Statement" is required to be posted on every location's Safety Bulletin Board as well as on the Company's internet safety site.	Each location has an area that posts various elements of the safety program. The entire safety program is posted on the company intranet website which every associate has access to. Also, many of our safety policies and programs are in the associate handbook, which all new hirees are given.

Company	Food Lion, LLC; Delhaize America, LLC	Sears Roebuck & Co.	Lowe's Home Centers, Inc.	Macy's Retail Holdings, Inc.	Elder Beerman
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Senior management periodically reviews the analytics in regards to the accident frequency rates, types of injuries and financials. However, as a department we share safety programs and its effectiveness with lower level management.	Yes.	Senior Management reviews the Safety program's effectiveness on a quarterly basis. Improvements and deficiencies are measured and discussed.	Yes, actually quarterly meetings are held. Also, Safety compliance and accident performance v. goal reports are distributed monthly.	Yes. At the store level the safety team meets monthly to review safety in their particular building. Quarterly, a corporate safety group meets to review accident data and review the overall program. This consists of senior management of the company
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes. There is a Substance Abuse Policy. An employee assistance program is also available in support of the written policy. Information provided during New Employee Orientation.	Yes. Sears Drug Free Workplace-Sears is committed to the health, safety, and welfare of our employees, their families, and customers. However, abuse of drugs and alcohol continues to be a problem in our communities and in the workplace. This abuse decreases productivity and increases accidents, absenteeism, medical disability costs, and thefts of company property by employees . . . employees may be asked to take a drug and/or alcohol test following an on-the-job accident or when management has reason to believe employees are using or abusing drugs or alcohol in violation of Company policy. Additionally, employees in positions designated as safety-sensitive are subject to random testing. Employees who refuse to be tested or who tamper with a drug test will be discharged	Yes. Lowe's is a drug free work place. All new hires are tested pre-employment where legal and if properly trained, management may intervene if an employee is suspected of being under the influence of drugs and alcohol.	NO.	Yes. The policy states that if there is reasonable suspicion that an associate's performance is being impaired as a result of the use of controlled substance or alcohol, which may occur either on or off the job, the Company may require associates to undergo testing for alcohol and controlled substances. Where associates refuse such testing they will be subject to disciplinary action, up to and including termination.

Company	Food Lion, LLC; Delhaize America, LLC	Sears Roebuck & Co.	Lowe's Home Centers, Inc.	Macy's Retail Holdings, Inc.	Elder Beerman
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	No.	No, there are no incentives for implementing the safety program. Store employees may receive a recognition lunch or congratulatory remark from their senior leaders for achieving outstanding safety performance.	Employees are rewarded with prizes for participating in the "Race for the Cup" program which reinforces the safety programs. Other rewards for good safety performance are also in place.	Yes, we have several programs. We have a claim performance program which creates goals for each location based on their past years claim experience. If a location maintains a strong safety program and reduces accidents (has less than their goal) the saved claim expense goes directly to their bottom line. If they have more, they are charged for more adding to the locations expense. Both situations effect bonuses. Also, we have a safety program execution incentive. If a location executes all aspects of the safety program, they receive a monetary award each quarter. Also, we have a "no Lost Time" award program which is both recognition and monetary basis.	No. However, accident prevention is part of loss prevention and management's responsibilities; in addition, loss prevention management has accident reduction on their annual review.
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	Yes	Yes	Our Counseling and Corrective Action Policy dictates that all safety violations are "Class A" violations and can lead to corrective action up to or including termination.	yes.	There is nothing specific to safety; however, there is a progressive disciplinary policy in place for violations of company policies, and safety would fall into that category.
Do you have Safety Committees at the Workplace that Meet Regularly?	No.	Yes	every location has a safety committee consisting of a mix of managers and employees that meet monthly and discuss safety issues and programs. They also complete various safety inspections and training sessions.	Yes.	Yes, it meets monthly, every month but the last quarter of the year.

Company	Food Lion, LLC; Delhaize America, LLC	Sears Roebuck & Co.	Lowe's Home Centers, Inc.	Macy's Retail Holdings, Inc.	Elder Beerman
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes--Manager on Duty	Yes	Safety department consisting of several dedicated corporate employees as well as a hierarchy of management dedicated to safety and loss prevention over every store. Most store also have store level employees dedicated to safety and loss prevention.	Yes	No, however, the Store Manager is ultimately responsible for safety within the building.
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Yes. A Survey of all tasks is reviewed annually to determine if the job tasks, safety practices, and/or PPE requirements need adjustment and retraining of any employee. If changes are reflected in the survey, changes will be documented in the specific job tasks "Training Aid." Each retail job function has an associated job training aid.	Yes, the work areas are evaluated monthly.	Completes a hazard assessment of all processes annually to ensure employees are properly trained and protected from workplace injuries. If new occupational safety issues are discovered, we attempt to engineer them out of the workplace first or secondarily provide PPE and training to protect the employees from the observed hazard.	Safety Inspections are completed by each location monthly. Also, corporate safety consultants survey buildings and complete job safety analysis/loss source investigations regularly.	we do not conduct safety surveys for each area, however, we do a safety audit of the entire store monthly.
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	If changes are reflected in the survey, changes will be documented in the specific job tasks "Training Aid."	The survey results are entered in a data base which generates action items for addressing issues. The store employees also have the ability to create action items unique to their store to address these issues.	we attempt to engineer them out of the workplace first or secondarily provide PPE and training to protect the employees from the observed hazard.	All inspections and surveys are written. Recommendations are created where applicable. All recommendations are assigned with a target completion date and require a written response. All are reviewed at monthly safety committee meetings.	The monthly audits are reviewed at the monthly safety action team meeting.

Company	Food Lion, LLC; Delhaize America, LLC	Sears Roebuck & Co.	Lowe's Home Centers, Inc.	Macy's Retail Holdings, Inc.	Elder Beerman
<p>Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?</p>	<p>Yes. 2 types. 1. Job modification-allows associates to return to their original job if their restrictions allow them to complete the essential functions with accommodations. 2. Temporary Alternate Duty -- program is for extreme to moderate restrictions. With this program, the associate is removed from his/her position temporarily and will perform similar to light duty functions in the store. The RTW coordinator monitors the RTW program and informs the managers once the claim is processed and the restrictions are sent to the RTW coordinator.</p>	<p>Yes. Executive Summary of the Return to Work Program. Each unit is required to implement the SHC Return to Work Program. The RTW Program is an organized method of bringing employees back to work, within medical restrictions, after an on-the-job injury or illness. Promptly returning an employee to the work environment has been proven to speed the recovery process and reduce related medical and compensation costs. There are three main issues when returning an employee to work: (1) Promote empathy for the employee; (2) communicate with the employee consistently; (3) Inform the employee of his/her return to work options. The goal of the SHC RTW Program is to make alternate/modified duty available to return an employee injured on the job to work as soon as possible. Showing empathy for the employee, providing consistent communication, and clearly communicating RTW options will help ensure a successful RTW Program in all units.</p>	<p>RTW program which is managed in each store by the Human Resources Manager and Store Manager. Corporately, we contract a third party to manage Nurse Case Management and RTW to assist in bringing injured employees back to work as soon as possible. Policies and Procedures as well as corporate review ensure compliance.</p>	<p>WE have a national RTW program that offers a maximum of 90 days of Light Duty. We also offer modified duty and both options are designed to accommodate an employee's temporary or permanent restrictions. The RTW Manager is located in the corporate office in Cincinnati, OH. There are five RTW Coordinators each responsible for a specific region. The RTW Coordinators have been trained to work exclusively with the HR Manager's at each store to notify them when restrictions become available to ensure that the restrictions are being accommodated appropriately. HR Manager's are instructed to meet with the injured employee to discuss the process.</p>	<p>Bon-Ton has no written RTW program. It is Bon-Ton's policy to accommodate Modified/Light Duty RTW. This means that the company will work with the employee and their physician to provide temporary job duties which meet the documented physical restrictions. This is handled through the HR department at each store. Corporately, we have a WC administrator who conducts an annual audit and an annual claim review. WE also have a claims manager who oversees the activities of the WC administrator and litigation process.</p>

Company	Food Lion, LLC; Delhaize America, LLC	Sears Roebuck & Co.	Lowe's Home Centers, Inc.	Macy's Retail Holdings, Inc.	Elder Beerman
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	<p>Yes. Incentive is to assist with lost time wages Food Lion would pay to the associate if we did not have a program for those with restrictions. This also allows the associate to work with restrictions and to earn additional money in conjunction with their workers' compensation pay. Another advantage, when an associate is physically back at the job site instead of resting at home will assist the associate to heal faster from a work hardening prospective.</p>	<p>Yes, there is a lost work day charge implemented for each day any injured employee misses time from work. The longer the time missed, the more severe the charge.</p>	<p>Management is educated as to the financial benefit of returning employees to work as soon as possible. Incentives are not directly paid based on RTW metrics.</p>	<p>Stores receive a \$500 incentive to return injured employees who have restrictions within 3 days or less for the first notice of restrictions.</p>	<p>No, there are no specific incentives.</p>
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	<p>Yes, train all entry level associates and new hires and annually there after as a refresher. All training is mandatory and is recorded on Learning Management System via electronic signature and dated. Training Aids are also used. Training is different by position. All retraining is accomplished by mandatory Computer Based Training that are required and flagged to be completed. Once, CBT's and Training Aids have been reviewed the employee is assigned to a trainer for the hands on portion of the training. Training time will vary by position.</p>	<p>Yes.</p>	<p>Safety training is mandatory for all employees when they are hired. All identified workplace hazards are covered including, Hazcom, Right to Know, Electrical, Ergonomic Issues, proper use of the equipment and where to find more information. Employees are trained using a 3 step process. 1. Classroom style training educates all employees to our culture and policies and procedures. The employee handbook is covered and new employees can have any questions answered. 2. Online training and video based training ensures Adult Learning Principals are used to give the best retention of programs. Verification via online testing ensures new employees have retained the information. 3. Depending on the new employees job, on the job supervised training is completed by a trainer to ensure competency.</p>	<p>Yes. Yes.</p>	<p>WE provide various types of job safety training. All employees at the new hire orientation are given an overview of the safety program and the OSHA standards. Affected employees are given specific training on safe lifting, hazardous communication training, Bloodborne pathogens training and lockout/tagout training. this is done at the time of their initial assignment. Bloodborne is done annually. Twice a year all locations participate in an emergency preparedness drill where they are trained on what to do in an emergency. Our company has a random threat plan in place which deals with workplace violence.</p>

Company	Food Lion, LLC; Delhaize America, LLC	Sears Roebuck & Co.	Lowe's Home Centers, Inc.	Macy's Retail Holdings, Inc.	Elder Beerman
Is All Training Mandatory?	Yes	Yes	Yes.	Yes.	Yes (OSHA). Evacuation training is complete for those who are present the day of the drill.
Are Written Manuals Used? If so, Please Describe.	Training Aids are used (electronic but can be printed.)	Training is conducted either using an online system or using written documentation such as a safety talk.	Yes. Described above.	No manuals, but all training topics have written materials, some have videos and the OSHA training programs have quizzes.	We have written procedures on the company intranet website.
Please Describe the Type and Length of Initial Training to New Employees	Yes, train all entry level associates and new hires	General Safety Training orientation is required for all new employees. Then employees are trained on specific topics relating to their job duties. Training length is dependent on the topic being trained on. For example, Blood borne Pathogens Awareness training is approximately 15 minutes, whereas MMHE training is 4 hours.	Employees are trained using a 3 step process. 1. Classroom style training educates all employees to our culture and policies and procedures. The employee handbook is covered and new employees can have any questions answered. 2. Online training and video based training ensures Adult Learning Principals are used to give the best retention of programs. Verification via online testing ensures new employees have retained the information. 3. Depending on the new employees job, on the job supervised training is completed by a trainer to ensure competency.	Training consists of mostly classroom training with some on the job/mentor instruction. Areas of training include, but not limited to, Safety Lifting practices, trip & fall hazard, good housekeeping, struck by/against exposures, cut/puncture exposures, and material handling equipment training.	Each newly hired associate participates in a new hire computer based training program. Within this training is a safety overview. Affected associates in any of the Oshawa standards have additional specific training that includes watching a DVD and in the case of Bloodborne must also take a written exam, and in the case of Lockout must also have hands on training. The length of the training varies depending on the training.
Please Describe the Type and Length of Initial Training to Current Employees	annually there after as a refresher.	Retraining is based on the job responsibilities of the employees. Each year Sears plans out the compliance and safety training that will be provided to the employees based on job tasks.	Similar to new hire training with one exception--Employees observed failing to follow safety programs will be retrained and possibly counseled. Depending on the reason for retraining, employees will be retrained at least once per year.	Same as above/annual.	Retraining may consist of watching a safety DVD that generally is within 10 minutes of length. The annual retraining of Bloodborne would be approximately 20 minutes.

Company	Food Lion, LLC; Delhaize America, LLC	Sears Roebuck & Co.	Lowe's Home Centers, Inc.	Macy's Retail Holdings, Inc.	Elder Beerman
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Yes, PPE is provided where necessary and PPE integrity and its use is inspected by the manager on duty and/or department manager.	Yes.	PPE is available to all employees using equipment that may require it. Regular inspection by the store employees, safety committee, and corporate employees ensures it is in working condition and being properly used.	Yes, equipment is included in monthly inspection program.	Yes we do provide PPE for those associates that need it, such as gloves for Receiving and gloves and goggles for visual. There is no specific system in place to ensure they are utilizing the equipment.
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes. Floor walks are conducted daily to ensure compliance and emergency lighting is inspected/tested monthly by contracted vendor Sylvania Lighting.	Yes.	Lowe's provides proper egress and ingress as well as emergency lighting. These issues are checked quarterly by the Safety Committee and annually by a contracted company.	Yes, egress and lighting is included in the location's monthly inspections and included in corporate safety audits. Lighting is also included as a PM item in our facilities management departments PM Program/Database.	Yes, the majority of our stores have emergency lighting, access and egress is checked monthly and is documented on the safety audit. An outside company conducts an annual inspection of the lighting.
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Yes, it is the responsibility of the manager on duty to ensure inspect and ensure compliance. Management conducts a complete store walk each day and submits the checklist/report to corporate via Electronic version.	Yes. There are monthly and annual safety inspections that review equipment in the locations.	Lowe's purchases equipment and office equipment corporately to ensure all equipment meets proper standards of safety including guarding. Quarterly inspections ensure the equipment is in proper condition.	Equipment is included in the location's monthly inspection program.	There are very few machines in our retail environment. Those that we do have are maintained in that specific department and there is generally one person within that area that would call for repair if it was not operating properly.

Company	Food Lion, LLC; Delhaize America, LLC	Sears Roebuck & Co.	Lowe's Home Centers, Inc.	Macy's Retail Holdings, Inc.	Elder Beerman
Is there a Program in Place to Address Emergency Preparedness?	Yes. There is a CBT requirement during new hire orientation and annually thereafter in regards to emergency evacuation and fire prevention. We also have a Severe Weather Plan addressing safety and operational SOPs.	Yes. The Emergency Planning an response Program provides information on facility emergency planning for severe weather, act of nature such as fire, loss of power, hurricane/tornado, flooding, wildfires, etc.	Every store has an Emergency Preparedness Manual and Quick Reference Chart. Stores are retrained annually on Emergency Preparedness.	Each location maintains an Emergency Plan of Action specific to their store/location which covers all aspects of life safety associated with emergency response. The template used by each location, and filled-out by each location is attached as Store Emergency Manual.	Yes. Program and procedure in place for almost all foreseeable emergencies, such as fire, tornado, earthquake, hurricane, workplace violence, bomb threat, hold up, mail safety, and power failure to name a few.
Have you Been Certified by an International Standards Organization?	No.	No.	No.	No.	No. However, accident prevention is part of loss prevention and management's responsibilities; in addition, loss prevention management has accident reduction on their annual review.
Do you Undergo any Regular Internal or External Safety Audits?	Yes and this is an internal process that is conducted daily by the manager on duty. Other processes include random safety audits by Food Lion's internal audit department and Proctor and Gamble. Proctor and Gamble is a contracted vendor who is in every store every six weeks. Included in the P&G audits are many work place safety items to be reviewed during the P&G review. The internal and external audits are both scored ensuring Food Lion is maintain acceptable standards in regards to safety.	Yes. The company's Internal Audit department conducts regular safety audits in the locations each year.	Lowes has several layers of Safety inspections including Daily/Monthly/Quarterly store inspections by different groups of employees and managers. Field Corporate staff perform monthly/quarterly inspections and third parties are used to independently inspect stores.	Yes, our corporate safety group conducts approximately 500 safety audits a year. Another 25-30 audits are completed by our insurance broker. In addition, the corporate safety group conducts an additional 1500-2000 location safety visits, conducting various safety activities--training, loss analysis, accident investigations, physical/premises safety inspections, etc.	Yes, each location is required to conduct a monthly safety audits. In addition, our insurance carrier and I conduct safety inspections at targeted locations throughout our company.

Company	Food Lion, LLC; Delhaize America, LLC	Sears Roebuck & Co.	Lowe's Home Centers, Inc.	Macy's Retail Holdings, Inc.	Elder Beerman
Contact Person	Eddie Hawks, Corporate Safety Manger, P.O. Box 1330, Salisbury, NC 28145-1330, 704-310-3622; wehawks@foodlion.com;	Holly Miranda 3333 Beverly Road; ALL-338A Hoffman Estates, IL 60179	James Spencer, Corporate Safety Manger, P.O. Box 1000, Mooresville, NC 28115	Allison Kloos, 7 W 7th St, Cincinnati, OH 45202	Judy Rabin, Corporate Safety Director; 999 N. Elmhurst Rd., Mt. Prospect, IL 60056.

UTILITIES

UTILITIES

Dominion Hope Gas

Allegheny Energy Service Corporation

Dominion Transmission, Inc.

VA Elec. And Power

Cabot Oil & Gas Corporation

Chesapeake Appalachia, LLC

American Electric Power Company, Inc.

Self-Insured Employers Safety Study Utilities

Company	Dominion Hope Gas	Allegheny Energy Service Corporation	Dominion Transmission, Inc.	VA. Elec. And Power	Cabot Oil & Gas Corporation	Chesapeake Appalachia, LLC	American Electric Power Company, Inc.
Approximate Number of WV Employees	200 employees		1354 employees	330 employees	160 employees	646 employees	2905 employees
Is there a Written Safety and Loss Program for Employees in Place?	Yes.	Yes.	Yes.	Yes.	Yes	Yes.	Yes
Major Components of the Program	Expectations and safe work practices. Philosophy, company responsibilities, management responsibilities, employee responsibilities.	Comprehensive program. Leadership engagement, hazard recognition and control, accountability and training.	Minimum rules and standards for working safely	Asbestos, blood borne, lab chemicals, combustible dust, compressed gas, Tagging, welding, etc.	Environmental Awareness; fall protection, fire safety, hazard communication, PPE, Bloodborne pathogens, lockout.	Incident reporting, Lockout, confined space, trenching and excavation, hot work, walking surfaces, haz communication, hydrogen sulfide, ladder, respiratory, first aid, Bloodborne, fire protection, PPE	S&H issues across the company where applicable.
Top 3 to 5 Programs in Place to Achieve Compliance	Eliminate potential sources of ignition; prevent cave-in; Monitor oxygen levels; wear seat belts. Excavation safety; respiratory protection; work zone traffic; fire protection.	Flash protection, PPE, fire prevention, Leadership Team, job specific progression training programs.	PPE; lockout; assured grounding (grounding of electrical equipment); Emergency Plan	1. combustible dust; confined space; fall protection; 4. barricading; equipment isolation	PPE; Hazard Communication Awareness; Lockout/Tagout; Confined Space Awareness; electrical Safety	Behavior Based Safety; Safety Policies and procedures including OSHA; Training	Safety.
Is the Written Safety Program Enforced?	Yes. Training, disciplinary action.	Yes. Progressive discipline up to and including discharge.	Yes. Investigation of incidents; monthly safety meetings.	Yes. Disciplinary action	Yes. Through management training and supervision. Termination is possible.	Required attendance and training meetings. Disciplinary action.	Corrective Discipline Policy

Company	Dominion Hope Gas	Allegheny Energy Service Corporation	Dominion Transmission, Inc.	VA. Elec. And Power	Cabot Oil & Gas Corporation	Chesapeake Appalachia, LLC	American Electric Power Company, Inc.
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	Yes.	Yes.	Yes and checked routinely.	Yes	Yes. Through management training and supervision. Termination is possible.	No. On Company website	Yes. Displayed throughout the Company.
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes. Union and management meet monthly.	Yes.	Yes-monthly	yes	Yes. Semi-annual meeting.	Yes. Weekly	Yes.
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes. Random and For-cause testing; Subject to discipline.	Yes. Federal regulations. 10 drugs for pre-hire, reasonable cause, post-accident and follow up testing after an initial positive test result.	Yes as per DOT and PHMSA guidelines	Yes. New employees and employees involved in accidents.	Yes. Pre-employment and random sampling is conducted.	Yes. New Hire testing, random, and for-cause testing.	Yes. Drug and alcohol testing policy.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	Yes. Annual Incentive Program. Performance evaluations.	Yes. Recognition and promotion program.	annual incentive program for management.	Yes. Employee's performance evaluation. Merit increases.	Yes. Quarterly in addition to milestone achievements.	Yes, safety award program. Fleet Award for those who are assigned a company vehicle.	Yes.
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	Yes.	Yes.	Yes.	Yes	Yes.	Yes. Severity of infraction.	Corrective Discipline Policy.

Company	Dominion Hope Gas	Allegheny Energy Service Corporation	Dominion Transmission, Inc.	VA. Elec. And Power	Cabot Oil & Gas Corporation	Chesapeake Appalachia, LLC	American Electric Power Company, Inc.
Do you have Safety Committees at the Workplace that Meet Regularly?	Yes. Monthly	Yes.	Yes.	Yes	Yes.	Yes.	Yes.
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes. 2-full-time.	Yes.	Yes.	Yes.	Yes.	Yes. Philosophy is that each employee is responsible for his own safety.	S&H organization across the entire AEP system.
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Yes. Safety assessment annually and every three years on smaller properties. Facilities have been audited in the last 2 years.	Yes. Annually safety is included in the overall company employee engagement survey.	Yes. Conducted annually.	Yes. Done frequently. External assessors annually, internally as well.	Yes. Annual survey	Yes.	Surveys done at both system wide level and particular location level.
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	any issues found are included in report. Correction and assurance that all issues are addressed.	Yes. Team addresses high level areas and develop improvement plans.	Yes--management team meets to discuss findings and site plans for addressing all issues.	spreadsheet is developed with all findings from survey.	Regional Safety Manager addresses issues.	Behavior Based Safety Program.	Not answered.
Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?	No. Accommodate the restrictions that are prescribed by the treating medical profession as the result of a work related injury. The use of RTW is company policy.	Yes. Written claims process that includes RTW. Light duty position list is maintained for each work location. Managed by corporate. Yes, Claims process is on website. WV checklist.	Have a program that reviews each incident and determines how the injury should be rated. When allowed to return and under what conditions.	RTW program but not RTW manager on site. Claims administrator at corporate. Yes When needed; process used by supervision following any injury to follow up.	Yes. RTW is coordinated with Regional Safety Manager and District supervisors as allowed. Yes.	Yes. Try to prevent lost time incidents by providing restricted duty, when feasible. Based on company need.	Yes. Local management on availability of such work and limitations the doctor may advise.
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	company expectation; safety goal section.	No.	Yes, LT/RD is part of Annual Incentive Program.	Yes. Expectations that RTW as soon as they are medically capable.	No.	No. On Company website	No.

Company	Dominion Hope Gas	Allegheny Energy Service Corporation	Dominion Transmission, Inc.	VA. Elec. And Power	Cabot Oil & Gas Corporation	Chesapeake Appalachia, LLC	American Electric Power Company, Inc.
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	Yes.	Yes.	Yes, initially in the classroom format; on the job training and online learning courses.	Yes.	Yes.	Yes.	Yes.
Is All Training Mandatory?	Yes.	Yes.	Yes.	Yes.	Yes.	Yes.	No. Depending upon job.
Are Written Manuals Used? If so, Please Describe.	Yes. Manuals and booklets.	Yes. Hard copy and Powerpoint.	Task and Steps, Safe Work Procedures as per job activity.	Online or with DVD, but Yes, some includes manuals.	Yes. Educational resources as well.	Several methods including classroom and online. Manuals are issued in some instances.	Varies.
Please Describe the Type and Length of Initial Training to New Employees	3 days of Safety Orientations; 3 weeks of Construction and Maintenance Training (including classroom)	Comprehensive which covers the safety and health programs. Training frequency goes beyond minimum federal requirements. Understanding of operations, potential hazards. Ongoing training; one-on-one and classroom. Multiple days of instruction	Online training and classroom based courses; DTI driver test; Industrial fork-truck operator hands on and field testing; CFR 1910.	Same as areas listed above. Classroom and in the field. Duration 2-3 hours per subject	Training varies in some cases based upon the experience of the employee and OSHA mandated.	Training in all Safety issues,	Done on an annual basis and is dependent on the work being done and the potential hazards encountered.

Company	Dominion Hope Gas	Allegheny Energy Service Corporation	Dominion Transmission, Inc.	VA. Elec. And Power	Cabot Oil & Gas Corporation	Chesapeake Appalachia, LLC	American Electric Power Company, Inc.
Please Describe the Type and Length of Initial Training to Current Employees	all employees are required to participate in weekly 30 minute safety and training tailgates covering related workplace tasks.	Training depends on subject and can vary between 1/4 hour to a full day. Classroom and on the job retraining.	Same.	Refreshers in Safety. Duration varies.	Training varies in some cases based upon the experience of the employee and OSHA mandated.	Retraining is ongoing for all field employees and supervision. Includes topics above in the components.	Same as above.
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Yes, evaluated for hazards and PPE is stocked in all warehouses. Failure to use PPE can result in discipline.	Yes, management safety audit system.	Yes Observation Process.	Yes., safety assessments.	Yes	Yes. Personal monitors are calibrated at least every 30 days.	Yes. Training addresses inspection techniques.
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	Yes.	Yes. Internal audits and corporate audits.	Yes.	Yes, maintenance repair work order and PM system in place.	Yes. Yes.	Yes, in company offices. Well sites, NO, because these are normally unmanned locations.	Not answered.
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Yes, regularly scheduled safety audits; inspected systematically at the local level.	Yes. Guarding assessment conducted periodically.	Yes.	Yes. Proper machine is maintained through a maintenance work order repair.	Yes. Regional Safety Manger and company personnel routines.	Yes. All responsible and periodic inspections.	Yes, Control of Hazardous Energy Policy.

Company	Dominion Hope Gas	Allegheny Energy Service Corporation	Dominion Transmission, Inc.	VA. Elec. And Power	Cabot Oil & Gas Corporation	Chesapeake Appalachia, LLC	American Electric Power Company, Inc.
Is there a Program in Place to Address Emergency Preparedness?	Yes, Emergency Plan covering all occurrences.	Yes. Evacuation and accountability procedures are site specific for each facility.	Yes, SOP and each site has written plan.	Yes, written emergency evacuation procedure. In house Emergency response team.	Yes. Annual response drills.	Yes, preparedness and response. Crisis management booklet.	Yes. Includes disaster, avian flu.
Have you Been Certified by an International Standards Organization?	No.	yes. 7 of our power stations are OSHA VPP Star Certified sites.	No.	No.	No.	No. On Company website	No. Dedicated to the OHSAS 18001 and ISO 14001
Do you Undergo any Regular Internal or External Safety Audits?	Yes, In addition to the ongoing observations done by Hope personnel, Safety assessment done annually. Every three years on smaller properties. Timeline for correcting issues.	Yes. Safety observations are performed by management and corporate.	1. Monthly safety observations; 2. Annual facility reviews; 3. DOT driver annual and quarterly audits.	Yes. Regular external safety assessments are done annually w/follow-ups in semi-annually. Internal safety assessments are done throughout the year.	Yes. 3rd party safety and environmental consultants, routinely conduct compliance audits on facilities.	Yes. Audited based on regulatory requirements of OSHA. Periodic safety assessments.	All locations conduct audits at predefined intervals to measure program at local level. Internal auditing Department.
Contact Person	Roger Buttke, Gas Safety & Training Specialist, Dominion Hope, 48 Columbia Blvd., Clarksburg, WV 26301	Michael G. Phillips, Manager, Project Safety, Medical & Workers' Comp.	James E. Parsons, Jr.; 445 West Main Street, Clarksburg, WV 26301	Tom Ponceroff, Route 93, HC 76, Box 430, Mt. Storm, Wv 26739	Gordon Ganaway, CSP, REM, 3 Memorial City Plaza, Building 840 Gessner Road, Suite 1400, Houston, TX 77024	Don Holloway, CSP, CHMM, 6100 N. Western Avenue, Oklahoma City, OK 73118	Richard Hoffman AEP Safety Manager.

MISCELLANEOUS

MISC.

EQT Corporation

Exxon Mobil Corporation

Aker Construction, Inc.

Huntington Bancshares Incorporated

Western and Southern Financial Group

Asplundh Tree Expert Co.

Self-Insured Employers Safety Study

Miscellaneous

	Oil & Natural Gas Production and Operations		Construction		Clerical		Other
Company	EQT Corporation	Exxon Mobil Corporation	Aker Construction, INC	Huntington Bancshares Incorporated	Western and Southern Financial Group	Asplundh Tree Expert Co.	
Approximate Number of WV Employees	444 Employees	2 Employees (two employees live in WV but currently no work site locations)	The employees working in WV are working on a project insured by a CCIP program, not the Self Insured Program	900 Employees	53 Employees	1015 Employees	
Is there a Written Safety and Loss Program for Employees in Place?	Yes	Yes	Yes	No, they are an office only environment and if there were ever a dust or noise issue it would be addressed like any other workers comp situation.	Yes	Yes	
Major Components of the Program	The program includes a corporate safety policy statement, standards and procedures that address the vision, organization, deployment, implementation and verification of company safety program	Please see below	Risk Assessment, Control of Work, Lifting Operations, Working at Height, Energy Isolation, Confined Space Entry, Excavations and Mobile Equipment	All claimants must complete accident/incident forms with supervisor and witness statements. They are reviewed by corporation insurance department	The Emergency/Life Safety Plan provides associates with information and procedures for use in the event of a natural disaster, accident, emergency or other miscellaneous threat.	Please see below	

	Oil & Natural Gas Production and Operations		Construction		Clerical	Other
Company	EQT Corporation	Exxon Mobil Corporation	Aker Construction, INC	Huntington Bancshares Incorporated	Western and Southern Financial Group	Asplundh Tree Expert Co.
Top 3 to 5 Programs in Place to Achieve Compliance	1. Training 2. Tailgate Safety Meetings (reviews job site hazards) 3. Program Verification (inspections and audits)	The major accident prevention, occupational health and loss control program elements are summarized as follows: 1. Management Leadership, Commitment and Accountability 2. Program Inspection and Evaluation 3. Safe Work Practices 4. Employee Training 5. Program Promotion and Enforcement 6. Accident Investigation, Reporting and Analysis 7. Workers' Compensation Administration 8. Program Assessment	See Above	N/A	1. Written procedures instruct local management to promptly identify and report problems with the facility to the Home Office Facilities Service Center. 2. Local management is responsible for identifying and addressing safety hazards for each location. 3. In emergency situations, local management is instructed to take appropriate action and then report the situation to the Home Office Facilities Service Center	1. Safety Administration 2. Safety Accountability 3. Safety Recognition Programs 4. Worksite Analysis 5. Incident Investigation 6. Communication Plans 7. Statistical Reporting 8. Safety Committees 9. Training 10. Process Evaluation Program
Is the Written Safety Program Enforced?	Yes, through supervisor observation, third-party and internal audits and inspections, and corporate safety metrics setting, tracking and reporting	Program promotion employs a number of vehicles to accomplish results. Some of the programs rely almost entirely on the emotional appeal to workers using safety meetings, posters, contests and awards. Others aim for individual participation of workers or worker groups through service on safety committees. Safety is also an importation party of annual employee performance evaluations.	Progressive Discipline Program	N/A	Yes, according to Human Resources disciplinary procedures	Yes, it is enforced by job behavior observation

	Oil & Natural Gas Production and Operations		Construction	Clerical	Other	
Company	EQT Corporation	Exxon Mobil Corporation	Aker Construction, INC	Huntington Bancshares Incorporated	Western and Southern Financial Group	Asplundh Tree Expert Co.
Are the Principals of the Program Posted on a Bulletin Board or Other Conspicuous Place at the Worksite?	The principals of the safety program are presented at new hire orientation, reviewed throughout the year at monthly safety meetings and posted on the company intranet site	Yes	Yes	All procedures and forms are posted on the intranet system	No	Yes
Does Senior Management Meet At Least Once Annually to Review the Safety and Loss Programs?	Yes, senior management meets no less than quarterly to review the program's compliance, effectiveness and overall progress status	Safety/health and loss control audits and inspections are conducted at various times of the year by professional individuals and teams, both internal and external. These audits evaluate each element of the loss control program as thoroughly as may be necessary to get a clear picture of its effectiveness and areas for improvement	Yes	No, the corporate insurance group is in charge of this program	Yes	Yes
Is there a Written Policy Regarding Drug and Alcohol Testing?	Yes	Yes	Yes the program includes pre-employment, random and for cause alcohol and drug testing	No	Yes, Drug and alcohol testing is performed pre-employment, for cause and on a random basis	Yes
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Safety and Loss Program?	Yes. Safety is included in the annual individual performance goal setting and tracking process. In addition, the corporation established a program to reward employees for meeting safety targets.	Yes	Each project develops a site specific incentive program. These include safety lunches, gift cards, raffles and others	If they find a location where there is belief that local management are not following corporate directives, it is dealt with	No	Yes, bonus levels are based on lost cost factor

	Oil & Natural Gas Production and Operations		Construction		Clerical	Other
Company	EQT Corporation	Exxon Mobil Corporation	Aker Construction, INC	Huntington Bancshares Incorporated	Western and Southern Financial Group	Asplundh Tree Expert Co.
Is there a Progressive Discipline Policy in Place to Address Violations of the Safety and Loss Program?	While EQT does not have a written disciplinary policy, EQT does discipline employees who violate work and/or safety procedures.	Yes. Discipline varies by site and operation. Some offenses are reason for immediate termination. For example, an employee caught using a cell phone driving can be terminated. Safety violations are also included as an important part of the employee's annual performance assessment. Contractors violating safety practices can be immediately escorted off the premises without warning.	Yes	N/A	Yes	Yes
Do you have Safety Committees at the Workplace that Meet Regularly?	Yes. The corporation has safety committees that meet on a regular basis	Yes	Yes	N/A	The Environmental Health and Safety Committee meets at the Home Office in Cincinnati, OH on a monthly basis.	Yes
Do you have At Least One Full-Time Employee Dedicated Solely to Oversight of the Safety Program?	Yes	Yes	Yes	There is one individual that manages the workers compensation program	No	Yes
Has a Safety Survey Been Completed for Each Work Area and Each Area Evaluated for Occupational Safety? How Often?	Yes, inspections/audits are conducted on a regular basis. Frequency of audits/inspections is commensurate with the work area risk (e.g. daily, weekly, monthly, annually and/or rotating third-party audit schedule)	Yes, safety surveys are completed.	Yes, at least weekly	No	Yes, inspections of the field office are performed at least once every three years	Yes, twice a day. More if the work scope changes

	Oil & Natural Gas Production and Operations		Construction	Clerical		Other
Company	EQT Corporation	Exxon Mobil Corporation	Aker Construction, INC	Huntington Bancshares Incorporated	Western and Southern Financial Group	Asplundh Tree Expert Co.
One Survey is Completed, is there a Protocol for Addressing Issues Reflected in the Survey? If so, What?	Yes, issues are entered into an on-line tracking system with designated owners and completion dates. Findings are monitored through their timely and appropriate completion.	Yes	The appropriate supervisor is contacted and corrective actions are monitored until completion.	N/A	Yes, there is review of the inspections by the Home Office personnel with subsequent follow-up and monitoring to ensure that all issues are addressed.	Yes
Do you have a Return-to-Work Program? Is it Actively Utilized by Management and Employees? What Procedures are in Place to Ensure it is Utilized?	No, however EQT's medical department in conjunction with the safety department evaluates each injury incident and, based upon the medical restrictions mandated by the employee's physician, EQT provides the opportunity for employees to return to work on light or restricted duty based on the approval of the physician.	Modified duty assignments are not pre-established. These assignments are determined on a case-by-case basis, due to the varied job responsibilities, physical requirements, claimant's medical restrictions and employee safety/health concerns. It is important and a part of the ExxonMobil loss control program to assist in returning an employee to work, even under modified work conditions	Yes, will accommodate an employee's restrictions if at all possible. This is monitored at the corporate office and by on site management	No, accommodations are made when able	Yes, but do not have a RTW manager at each facility. An associates RTW is coordinated through the district sale manage and Home Office Human Resources	Yes, lower claim costs improve profitability and bonuses
Are there Incentives Provided to Management and Employees for Reviewing and Implementing the Return-to-Work Program?	Yes	See Above	No	N/A	No	Yes, the claim costs are charged back to the region via a cost allocation program. However claim costs improve profitability and bonuses.

	Oil & Natural Gas Production and Operations		Construction	Clerical	Other	
Company	EQT Corporation	Exxon Mobil Corporation	Aker Construction, INC	Huntington Bancshares Incorporated	Western and Southern Financial Group	Asplundh Tree Expert Co.
Do you Provide Training for Employees (including management) Participating in Job Activities Involving Potential Workplace Hazards? Does this Training Include Training Regarding All Workplace Hazards Applicable to the Industry?	Yes	Yes	Yes, a site specific safety program is developed and includes training requirements	Some safety aspects are covered during orientation	Yes, and it includes all workplace hazards	Yes
Is All Training Mandatory?	Yes	Yes	Yes	Yes	No	Yes
Are Written Manuals Used? If so, Please Describe.	The corporation develops training content, trainer's notes/instructions and performs train-the-trainer sessions	Yes	They are used for supervisor training and all employees receive a copy of Just Rule Safety manual.	There are written security manuals and teller training manuals for those jobs	No	Yes

	Oil & Natural Gas Production and Operations		Construction	Clerical	Other	
Company	EQT Corporation	Exxon Mobil Corporation	Aker Construction, INC	Huntington Bancshares Incorporated	Western and Southern Financial Group	Asplundh Tree Expert Co.
Please Describe the Type and Length of Initial Training to New Employees	New employees receive a 30 minutes safety orientation on the first day plus discussion by the supervisor on the job hazards, mitigation measures and expectations. They also participate in a 6 hour new hire safety training. Additional training is provided based on job classification and is a mixture of classroom and hands-on. Certain job classifications also receive operator qualification training that is 2-4 days in length, depending on job duties	Employee training programs are structured for the unique requirements of each operating division and implemented through internal operating location organizations and/or independent contracted consulting firms. Educational programs are based on creating safer working habits. Internal organizations provide current information and training on occupation health subjects. Each organization develops a training matrix and maintains records on each employee to track training received and identify employee and operational training needs. Employees routinely attend training schools to enhance and update their training and understanding. These training programs range from a one-hour refresher session up to an 8-hour training course.	All employees attend a site specific safety orientation and other training that is required. This includes fall protection, scaffolding, excavations, energy isolation, tool safety, housekeeping, mobile equipment, work permits, rigging and other topics	All training classes are e-classes combined with on-the-job training. Ergonomic concerns/pointers are covered in on-the-job training	There are 3 web based safety training programs, each approximately 30 minutes in length.	Once hired, new employee completes 3 months of Groundperson training. Then to move further 6 months of training is required to be a Bucket Operator, Specialized Equipment Operator or a Climber Trimmer (this is actually 12 months of training as you train for 6 months to be a trainee then another 6 months before a climber trimmer)
Please Describe the Type and Length of Initial Training to Current Employees	Retraining is provided every three years for requalification. There is also monthly retraining on workplace hazards.	See Above	N/A	N/A	The web-based training programs are available to all field associates, new hires as well as current employees	Please see above

	Oil & Natural Gas Production and Operations		Construction	Clerical		Other
Company	EQT Corporation	Exxon Mobil Corporation	Aker Construction, INC	Huntington Bancshares Incorporated	Western and Southern Financial Group	Asplundh Tree Expert Co.
Do you Provide Appropriate Personal Protection Equipment to Employees Who have the Potential for Exposure to a Workplace Hazard? If so, is there a System in Place for Regular Inspection to Ensure Equipment is Properly Utilized?	Yes, regular observations are provided by supervisors through onsite work area visits and tailgate safety meetings	Yes	Yes, PPE is included in the safety inspection program	N/A	No, they are an office environment where normal operations do not require the use or provision of PPE. Refurbishment activities are handled by qualified contractors and performed at times outside of normal working hours	Yes
Do you Provide Appropriate Access and Egress to the Facility, Including Proper Emergency Lighting? If so, is there a System in Place for Regular Inspection to Ensure the Access, Egress and Lighting is Properly Maintained?	The larger sites located in commercial buildings are quipped with emergency lighting. For some of the smaller operations, the equipment is not in place due to the type of structure and number of employees. With the exception of their Clarksburg facility, the other facilities are rented and they rely on the property manager to maintain the facilities	Yes	Yes, this part of the safety inspection program for all projects	Yes, Branch office opening and closing protocols MUST be followed per security procedures. Cameras are also utilized	Yes	Not applicable. No office space is maintained in WV. Particular field conditions are addressed in daily job briefings
Are the Machines Properly Inspected, Guarded, Maintained and Operated?	Yes. Employees are trained on recognition of machine guarding hazards, inspection and proper use of guards. Additional, equipment requiring guarding is regularly observed for proper condition and is part of the corporation's inspection/audit process	Yes	yes, equipment is inspected when it is received at the site then inspected periodically and these inspections are documented	Yes, there is a system in place on the intranet system where repairs can be requested	Yes, the company has a service agreement for repair and regular preventive maintenance for copiers and printers	Not applicable. No office space is maintained in WV. All tools are inspected daily and proper guarding is maintained

	Oil & Natural Gas Production and Operations		Construction	Clerical	Other	
Company	EQT Corporation	Exxon Mobil Corporation	Aker Construction, INC	Huntington Bancshares Incorporated	Western and Southern Financial Group	Asplundh Tree Expert Co.
Is there a Program in Place to Address Emergency Preparedness?	Yes	Yes	Yes, each site develops an emergency plan which includes providing medical treatment and evacuations. Practice drills are also held.	Since they are a nationally chartered financial institution, each location is required to have a current business continuity plan which is tested each quarter	Yes	Not applicable. No office space is maintained in WV. Particular field conditions are addressed in daily job briefings
Have you Been Certified by an International Standards Organization?	No	Not applicable as there are no WV sites	No	N/A	No	No
Do you Undergo any Regular Internal or External Safety Audits?	Yes. The Corporation has a process to conduct both internal (safety department) and external safety audits each year	Yes	Yes, each project is scheduled for a corporate Safety Assessment. These corporate audits/assessments happen quarterly	No	Inspections of the field offices are performed at least once every three years	Yes
Contact Person	Sharon Strupek EQT Corporation	B.L. Hooper Exxon Mobil Corporation	Mark Mascio Aker Construction, INC	Denise M. Love Thompson Vice President Director Corporate Insurance Huntington Bancshares Incorporated	Melissa Davis Risk Analyst Western & Southern Financial Group	David Riggs Asplundh Tree Expert Co.