

**SECTION 50****SUBCONTRACTOR MANAGEMENT****1. APPLICABILITY**

- 1.1. This standard is applicable to subcontractors retained by all divisions of The MAPP Group, LLC, and its subsidiary companies that perform:
  - 1.1.1. Intrinsically higher-risk construction-related activities (e.g., drilling, excavation, surveying, demolition, electrical contracting, steel erection etc.).
  - 1.1.2. Significant building or infrastructure alteration, demolition, and/or repair activities using their own workforce or equipment.
  - 1.1.3. Activities on hazardous waste sites.
  - 1.1.4. Activities in government services operations (e.g., aviation repair, vehicle repair, warehousing, facility operations, and maintenance) where the annual cost of the subcontract exceeds \$1,000,000
  - 1.1.5. An activity where MAPP does not supervise the day-to-day activities and work efforts of subcontractor workers, **and** the subcontractor has a designated Supervisor on the work site.

This procedure is applicable to the operations of subcontractors and sub-subcontractors of any tier.

This procedure does not apply to third-party contractor operations where there is no subcontract relationship between the contractor and MAPP. Health, Safety, and Environment issues regarding third-party contractor operations are governed by project-specific contracts, and are not covered by this standard.

**2. PURPOSE AND SCOPE**

- 2.1. This procedure provides requirements on the pre-evaluation of subcontractor safety programs; contractual risk management; subcontractor safety performance on the job site; and the responsibilities of the Project Manager with respect to subcontractor jobsite safety performance.

3. Each MAPP subcontractor must be evaluated at least annually using the MAPP Vendor Qualification Form.

**4. IMPLEMENTATION**

- 4.1. Implementation of this standard is the responsibility of the MAPP Project Manager directing activities of the facility, site, or project location.

**5. REQUIREMENTS**

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- 5.1. Pre-qualification of Subcontractor – The Project Manager will complete the following procedures for all subcontractors retained on projects covered by this standard (the PM should also require subcontractors to follow these procedures with respect to pre-qualification of sub-subcontractors of any tier):
  - 5.1.1. Request all subcontractor candidates to complete the attached MAPP Vendor Qualification Form.
  - 5.1.2. Conduct an assessment of each subcontractor's qualifications with respect to the subcontractor health and safety evaluation criteria contained in Attachment 2 – Evaluation Criteria.
  - 5.1.3. If the subcontractor does not meet the criteria established in Attachment 2 – Evaluation Criteria., and MAPP must retain the contractor, the Subcontractor Variance Form (Attachment - 3) must be completed and approved by a Corporate, Health and Safety Manager.
  - 5.1.4. Verify that subcontractors meet the insurance requirements as stated in Attachment 2 – Evaluation Criteria., or as approved by MAPP Legal Counsel or Contracting Manager/Officer.
  - 5.1.5. If the subcontractor has been successfully evaluated within the last 12 months that evaluation may be substituted.
  - 5.1.6. For long-term operations, update this evaluation within 12 months of the previous evaluation.
- 5.2. Contractual and Risk Management Requirements of Subcontractors
  - 5.2.1. Ensure that the subcontractor is contractually bound to comply with applicable client and MAPP Health and Safety Program requirements.
  - 5.2.2. Ensure that subcontractor is contractually bound to develop additional safety procedures for work that is exclusive to their activities on the site, and for which they may have superior knowledge.
  - 5.2.3. Assess compliance of subcontractor's insurance with the MAPP subcontract requirements (including, but not limited to, necessary types and amounts of coverage, MAPP additional insured endorsement, etc.).
  - 5.2.4. Ensure that MAPP has the right in its subcontract, without liability to MAPP, to stop the subcontractor's work in the event of any violations of the applicable Health and Safety Plan.
- 5.3. Subcontractor Safety Representative (SSR)
  - 5.3.1. Require each subcontractor to appoint a Subcontractor Safety Representative who:
    - 5.3.1.1. Is knowledgeable of the subcontractor's activities.
    - 5.3.1.2. Understands the safety requirements of the subcontractor's activities.

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- 5.3.1.3. Has the ability to recognize and the authority to correct safety deficiencies and execute a stop work order should an imminent danger arise.
- 5.3.1.4. Has the responsibility for the administration of the subcontractor Health and Safety Program.
- 5.3.1.5. Will serve as the direct contact with MAPP regarding resolution of health and safety issues.

**5.4. Communication**

- 5.4.1. Provide the SSR with information regarding Site Safety Program including but not limited to:

- 5.4.1.1. Client Requirements
- 5.4.1.2. MAPP HS Program
- 5.4.1.3. Site Hazard Communication Program
- 5.4.1.4. Site Emergency Action Plan
- 5.4.1.5. Any additional safety information from other contractors or subcontractors working on the site.

- 5.4.2. Provide the SSR with the name of the MAPP project or site contact and alternate for addressing site Health and Safety issues.
- 5.4.3. Require the participation of subcontractors in all Site Safety Briefings.
- 5.4.4. Require subcontractor compliance with all safety directives and/or stop work orders issued by the MAPP site representatives.
- 5.4.5. Insure all subcontractors are included in pre-job safety orientations, pre-job meetings, and daily Job Safety Assessments (JSA) process.
- 5.4.6. Project Managers shall include subcontractors in regular job safety inspections and participate in job hazard analysis.

**5.5. Subcontractor Safety Performance**

- 5.5.1. To the extent reasonable in light of MAPP scope of work under the client contract, visit the site and periodically observe subcontractor's operations (i.e., conduct spot checks) to assess whether subcontractor appears to be conducting their operations in accordance with applicable health and safety requirements. Periodically review any required subcontractor health and safety written documentation for compliance with applicable requirements.
- 5.5.2. In the event that unsafe acts or unsafe conditions are observed, immediately stop work, and bring them to the attention of the SSR for resolution.
- 5.5.3. Investigate all injuries/illnesses related to subcontractor operations to identify causes and effect corrective actions.

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- 5.5.4. In the event of serious and/or continuing subcontractor breaches of applicable health and safety requirements, contact legal counsel to assess whether formal contractual action is appropriate under the subcontract.

**6. DOCUMENTATION SUMMARY**

The following documentation will be maintained in the project file:

- 6.1. MAPP Vendor Qualification Form.
- 6.2. Applicable and current Insurance Certificates
- 6.3. Names and telephone numbers of SSR for each subcontractor
- 6.4. Verification of Health and Safety documents transmitted to subcontractors and received from subcontractors.
- 6.5. Identified safety deficiencies as applicable for subcontractors and verification of correction of conditions
- 6.6. All other safety related documentation between MAPP and subcontractor such as training certifications, etc.
- 6.7. Subcontractor safety plan, incident reports, and resolution reports

**7. RESOURCES**

- A. "Occupational Injury and Illness Rates by SIC," Bureau of Labor Statistics, U. S. Department of Labor (<http://www.bls.gov/iif/oshsum.htm>)
- B. Managing Subcontractor Safety, Prepared by The Construction Industry Institute, Safety Task Force, Publication 13-1, The University of Texas at Austin, Austin, Texas, 1991 (<http://www.construction-institute.org/>)
- C. American National Standard Construction and Demolition Operations—Safety and Health Program Requirements for Multi-Employer Projects, ANSI A10.33-1992, National Safety Council, Itasca, Illinois 60143-3201 (<http://www.nsc.org>)
- D. "Liability, OSHA, and the Safety of Outside Contractors," Professional Safety, American Society of Safety Engineers, January 1993 (<http://www.asse.org>)
- E. "Proactive Construction Management; Dealing With the Problem of Subcontractor Safety," Professional Safety, American Society of Safety Engineers, January 1990 (<http://www.asse.org>)

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### SUBCONTRACTOR MANAGEMENT

#### 8. Attachments

MAPP Vendor Qualification Form

MAPP Subcontractor Risk Evaluation Report

HSE50-002 – Evaluation Criteria

FM-HSE50-003 – Subcontractor Variance Form

## Subcontractor Evaluation Criteria

Prior to engaging a subcontractor on a project, Project Managers are required to ensure that the contractor has an effective safety program, is capable of conducting its operations in a safe manner, and has appropriate insurance coverage. The following criteria shall be followed in determining whether the subcontractor may be used on a MAPP project.

Note: Some questions/answers from MAPP Vendor Qualification Form are not discussed in the evaluation criteria below. These questions are asked and the answers are intended to help the Project Manager understand the safety culture and/or safety priority of the subcontractor.

### 1. GENERAL INFORMATION

- A. The subcontractor must be able to complete Safety section on Page 1 of the questionnaire (MAPP Vendor Qualification Form),
- B. For assistance determining the NAICS for a business, refer to the U.S. Census Bureau online at <http://www.census.gov/epcd/naics02/>.
- C. If subcontractor has performed work for MAPP LLC previously, check safety performance history with previous MAPP, Project Manager.

### 2. WORKERS' COMPENSATION EXPERIENCE INFORMATION

- A. For any EMR listed as greater than 1.0, the contractor has failed the sub-evaluation. Further consideration may not occur without referral to a MAPP Corporate, Health and Safety, Manager for further assessment.
- B. If all EMRs listed are 1.0 or below, continue with the evaluation.

### 3. SAFETY PERFORMANCE

- A. For any OSHA Total Recordable Incident Rate (line G in table) listed as greater than 4.0, the subcontractor has failed the evaluation. Further considerations may not occur without referral to a URS Corporate, Regional, or SBU HSE Manager in your Region for further assessment.
- B. If the Total Recordable Incident Rates are at or below 4.0, continue with the assessment.
- C. If the contractor has had a fatality, further consideration may not occur without referral to a URS Corporate, Regional, or SBU HSE Manager in your Region.
- D. Determine the subcontractor's citation history at <http://www.osha.gov/cgi-bin/est/est1>. Click on Establishment Search, enter the subcontractor's name. Query Case Status Open and Closed. Compare the published data to the subcontractor questionnaire. The subcontractor must explain any discrepancies.

- E. Look for willful, serious, and repeat violations. If they suggest a problem, request information and refer to a MAPP., Regional, or SBU HSE Manager in your Region for further assessment.

#### **4. RISK MANAGEMENT/INSURANCE DATA**

- A. The inability to provide insurance coverage at the stated amounts requires referral to the MAPP. Legal Department.
- B. The ability to provide Insurance Certificates naming MAPP. Corporation as an additional insured is required. Refer any questions to the MAPP. Legal Department.
- C. Proof of Workers' Compensation Insurance is required. Refer any questions to the MAPP. Legal Department.

#### **5. HEALTH AND SAFETY PROGRAM**

For Sections 4 through 8, if a subcontractor answers „No“ to any of the questions, the Project Manager needs to consider the type of work the subcontractor will be performing (e.g. HAZWOPER work required medical surveillance exams) to determine if the answer is acceptable.

- A. For small subcontractors, a “No” answer is not unexpected and may be acceptable with good EMR and OSHA statistics. Generally, some minimal program is expected depending on the breadth and complexity of the work. Contact a MAPP Corporate HSE Manager for further assessment if you have any questions or doubts.
- B. It is expected that a subcontractor being hired to perform services on the project site should be the best prepared to address safety issues for their operations, especially when specialty work is being conducted, or for work in which the subcontractor possesses superior knowledge of their operations.
- C. “No” answer should be referred to a MAPP Corporate Health and Safety Director for further assessment.

**Exception:** If the subcontractor does not meet the other requirements outlined above, the decision will be that the subcontractor will not be used. However, if a unique business need exists (e.g., subcontractor is a specialty subcontractor), the Project Manager should initiate a Subcontractor Variance Request (FM-HSE50-003 Subcontractor Variance). The Subcontractor Variance must be approved by a MAPP Corporate Safety Director.

## Subcontractor Variance Form

Subcontractor Name:

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Project or Site Location:

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Description of Work to be Performed:

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Explain any of the following conditions that apply to the subcontractor:

EMR greater than 1.0

TRIR greater than 4.0

Fatalities within the past 3 years

Willful, serious, or repeat OSHA citations

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Why should we use this subcontractor?

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Have other similar subcontractors been evaluated? If so, please explain.

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Mitigations by Subcontractor and MAPP to manage the risks.

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**Review:****Project Manager Requesting Variance****Name:** \_\_\_\_\_**Date:** \_\_\_\_\_**Signature:** \_\_\_\_\_**HSE Corporate Safety Director Approval****Name:** \_\_\_\_\_**Date:** \_\_\_\_\_**Signature:** \_\_\_\_\_