

NEW MEXICO

*Application for
The Oil and Gas Safe Site Program*

with the

**Occupational Health and Safety Bureau
New Mexico Environment Department**

The Occupational Health and Safety Bureau (“OHSB”) of the New Mexico Environment Department and _____ (“*Program Participant*”) commit to fostering trust and respect for each other’s roles and responsibilities in the oil and gas safety process and to working as partners in achieving occupational safety and health for the oil and gas industry by:

- Building and maintaining a relationship based on open communication, respect, good faith, understanding, and fairness;
- Sharing information about new technology and best practices for improving occupational safety and health;
- Cooperating to achieve continuous improvement of safety training programs for the oil and gas industry;
- Providing ongoing recognition throughout the oil and gas industry for those companies that consistently demonstrate excellence in occupational safety and health; and
- Recognizing and embracing the responsibilities inherent in these roles.

Consistent with these commitments, OHSB and the *Program Participant* agree to the attached *Program Agreement*, the objectives of which are:

1. To reduce the number of injuries, illnesses and fatalities, with an emphasis on those resulting from falls, struck-by, caught-in mishaps, chemical exposures, electrical shocks, fire and vehicle accidents.
2. To increase the number of oil and gas companies that implement effective occupational safety and health programs;
3. To offer incentives to oil and gas companies that demonstrate effective implementation and a commitment to continual improvement of their occupational safety and health programs; and

4. To decrease workers' compensation expenses.

The phases of this *Program Agreement*, as defined in the attached document, will have terms of: six months for Entry Level; six months for Transitional Level; and one year for the initial Superior Level. If the *Program Participant* achieves Superior Level and remains eligible for participation, the *Program Agreement* may be renewed every two years at the request of the company.

This *Program Agreement* may be amended from time to time based on the consent of both parties. Either party may withdraw from the Partnership upon thirty days written notice to the other party.

Butch Tongate
Bureau Chief
Occupational Health and Safety Bureau
New Mexico Environment Department

_____, 2007

Program Participant

_____, 2007



The Oil and Gas Safe Site Program

With the

New Mexico Occupational Health and Safety Bureau

And

1. Employee/Employer Rights

- A. This Oil and Gas Safe Site Program does not affect an employee's rights under the Occupational Health and Safety Act, NMSA 1978, 50-9-1, et seq., and New Mexico Occupational Health and Safety regulations (collectively, "the OHSA").
 - 1) Employee rights guaranteed under OHSA, including walk-around rights, the right to file an occupational safety and health complaint, and the right to information collected pursuant to Occupational Safety and Health Administration ("OSHA") requirements (e.g., the OSHA 300 log and medical exposure records), are an integral part of an effective occupational safety and health program.
 - 2) The Program is intended to support maximum employee involvement in the day-to-day implementation of job site occupational safety and health programs, as well as the completion of employer self-audits, site inspections, job hazard analyses, occupational safety and health program reviews and incident investigations.
- B. The Program does not affect the rights of the employer guaranteed under the OHSA Act.
- C. Participation in the Program does not remove the employer's responsibility to comply with the rules and regulations adopted under OHSA, nor does it remove the employer's responsibility to comply with commitments negotiated via separate agreements with OHSB.

2. Agreement Program

- A. The Program is an objective, organized tool for oil and gas companies to use in evaluating, strengthening and measuring improvements in their occupational health and safety programs. It allows the companies to benchmark their programs against standards of excellence in twenty areas of the Agreement Verification Criteria (see attachment 1).
- B. The Program has three levels. The Entry Level is based on a company's self-evaluation of the content and performance of its occupational safety and health program with assistance from the OHSB Consultation Program staff. Upon verification by the OHSB Consultant in charge of the Program, that the company is making satisfactory progress toward achieving the goals of the program, it will be elevated to the Transitional Level.

- C. When the company has met the criteria for the highest level of participation, and such performance has been verified by an OHSB Consultation Program site visit, the company will advance to the Superior Level.
- D. The Program Agreement process has three phases.
- 1) Phase One is the application process. The company must complete an OHSB Consultation Request Form, to initiate a comprehensive safety and health consultation visit, and the Partnership Application. As part of the application, the employer must submit the three most recent years of OSHA Forms 300 and 300A. OSHA 300 log data is used by the OHSB Consultation Program to evaluate applicants. The applicant must verify completion of Entry Level requirements on the Verification Criteria document (see attachment1) and a score of 55 points qualifies the company to the Entry Level.
 - 2) Phase Two consists of a company rating the components of its occupational safety and health program using Verification Criteria for the Transitional Level. Rating numbers are totaled, providing a self-evaluation score. Self-evaluation scores are used to determine acceptance into the Transitional Level of the Agreement Program. The score of at least 70 points moves the company from Entry Level to Transitional Level.
 - 3) Phase Three consists of additional requirements for moving to the Superior Level. In order to move to the Superior Level, applicants:
 - a) Must have earned a program evaluation score of at least 85 on the Verification Criteria, as determined by the OHSB Consultant and approved by the Consultation Program Manager;
 - b) Must have an occupational injury and illness rate Total Recordable Cases(TRC) and Days Away, Restriction, Transfer rate(DART) per Bureau of Labor Statistics data, that is below the most recent national average for the Industries, North American Industrial Classification System (NAICS), using the three year average method;
 - c) Must agree to random site visits to verify that the company continues to satisfy all Safe Site participation criteria and that all elements of an effective safety and health management system remain fully operational;
 - d) Must not have had a fatality or catastrophic event for which citations were issued within the past year; and
 - e) Must have trained all foremen and field supervisors in a general industry hazard recognition class, or equivalent.
- E. The Program participant will receive a certificate when the company has reached the Superior Level.
- F. The Program participant will be exempt from OSHA Programmed Planned inspections while in compliance with the program.

The Oil and Gas Safe Site Program

Verification Criteria

Company _____ NAICS _____

Authorizing Company Officer

Name _____
 Title _____
 Signature _____ Date _____

Company Contact Person (e.g., Safety Director)

Name _____
 Title _____
 Signature _____ Date _____

Beginning from the left-most column, check all items that apply under each section heading. If all items in left-most column are checked, record the score and then proceed down to next section. If all items in left column are not checked proceed to next column(s) to right until all items in a column under a section heading can be checked. Record the score for the first column that has all items checked.

A. <u>Employer Commitment.</u> Review documents such as policy statements, company surveys or survey results on safety, employee suggestion letters.			
Superior Level 5	Transitional Level 3	Entry Level 2	Score
Employer <input type="checkbox"/> Participates in safety program <input type="checkbox"/> Sets objectives for safety <input type="checkbox"/> Requires feedback on program <input type="checkbox"/> Provides necessary funds <input type="checkbox"/> Includes safety as part of company-wide performance appraisals	Management <input type="checkbox"/> Participates in safety program <input type="checkbox"/> Requires feedback on safety program <input type="checkbox"/> Provides funds for safety activities	Management <input type="checkbox"/> Wants and supports safety but does not participate <input type="checkbox"/> Provides funds for safety activities	
B. <u>Employer Policy Statement on Safety.</u> Review documents, such as policy statements, safety manuals, and letters from management regarding safety.			
Superior Level 6	Transitional Level 3	Entry Level 1	Score
Safety policy <input type="checkbox"/> Is in writing <input type="checkbox"/> Is known to all employees <input type="checkbox"/> Is part of safety manual <input type="checkbox"/> Defines purpose and scope of safety program <input type="checkbox"/> Emphasizes employer approach <input type="checkbox"/> Is signed and supported by top person(s) in company	Safety policy <input type="checkbox"/> Exists/is in writing <input type="checkbox"/> Has not been explained to employees, but is posted <input type="checkbox"/> Authorizes loss prevention activities	<input type="checkbox"/> Safety policy exists but is not known by employees	

C. <u>Responsibility for Safety Defined.</u> Review documents such as policy statements, safety manuals, policy and procedure manuals, company organizational chart, supervisors' and safety directors' job descriptions.			
Superior Level 3	Transitional Level 2	Entry Level 2	Score
Responsibility for safety <input type="checkbox"/> Defined for everyone in company <input type="checkbox"/> In writing and part of safety manual <input type="checkbox"/> Supervisors/foremen have key responsibilities	Responsibility for safety <input type="checkbox"/> Defined for everyone in company <input type="checkbox"/> Supervisors/foremen have key responsibilities	Responsibility for safety <input type="checkbox"/> Rests solely with designated safety coordinator <input type="checkbox"/> Receives assistance with implementation of safety program from supervisory personnel	
D. <u>Experience Modification Rate (EMR).</u> Review documentation that supports company's EMR. Conduct random interviews of management personnel. Has NCCI or insurance company documents with EMR rates from previous years.			
Superior Level 3	Transitional Level 2	Entry Level 1	Score
<input type="checkbox"/> EMR is below 0.85 for each of last three years. <input type="checkbox"/> Employer reviews the costs of accidents and how EMR affects company <input type="checkbox"/> Insurance lost runs revised monthly	<input type="checkbox"/> EMR is between 1.0 & 0.85 for each of last three years. <input type="checkbox"/> The cost of accidents is reported to the project manager	<input type="checkbox"/> EMR has decreased two of the last three years	
E. <u>Resources for Safety.</u> Review company's annual budget or other supporting documents. Conduct random interviews of management personnel.			
Superior Level 3	Transitional Level 2	Entry Level 1	Score
<input type="checkbox"/> Resource needs are established annually for safety <input type="checkbox"/> Resource needs are based on planned programs <input type="checkbox"/> Estimates are made on savings contributed by safety program	<input type="checkbox"/> An annual safety allocation is established but not necessarily based on planned activities <input type="checkbox"/> Safety budget provided.	<input type="checkbox"/> Money for safety is taken from general funds as needed	
F. <u>Safety Program Goal Setting.</u> Review documents such as policy statements, meeting notes, safety performance documents, company <i>Continuous Improvement Program</i> documents, and goals of the safety director.			
Superior Level 4	Transitional Level 3	Entry Level 2	Score
<input type="checkbox"/> Needs analysis is used to set safety program goals/objectives <input type="checkbox"/> An action plan is developed to accomplish goals/objectives <input type="checkbox"/> Feedback is required from those assigned tasks <input type="checkbox"/> Audits are made to assess action plan effectiveness	<input type="checkbox"/> Safety program goals and objectives are set annually <input type="checkbox"/> Employees are aware of the goals and objectives <input type="checkbox"/> Feedback is required from those assigned tasks	<input type="checkbox"/> Informal goals are set for accomplishment through the safety program <input type="checkbox"/> Results are discussed at least annually	

G. Employer Supervisory Meetings. Review documents such as meeting agendas, notes and minutes where safety items are noted.			
Superior Level 3	Transitional Level 2	Entry Level 1	Score
<ul style="list-style-type: none"> <input type="checkbox"/> At least monthly supervisor meetings are held with supervisors where safety is on the agenda <input type="checkbox"/> Supervisors give a status report on job site safety activities <input type="checkbox"/> Serious accidents are reviewed 	<ul style="list-style-type: none"> <input type="checkbox"/> Occasional meetings are held with supervisors at which safety is on the agenda <input type="checkbox"/> Serious accidents may be reviewed 	<ul style="list-style-type: none"> <input type="checkbox"/> Accidents/Incidents are mentioned but no action is taken. 	
H. Pre-Planning for Job-Site Safety. Review documents relating to job safety and/or job hazard analysis sheets, project check lists. Conduct random employee interviews.			
Superior Level 4	Transitional Level 3	Entry Level 1	Score
<ul style="list-style-type: none"> <input type="checkbox"/> Pre-job safety planning is required at the bid stage <input type="checkbox"/> A check list is used by the supervisor to assure all exposures are considered <input type="checkbox"/> Necessary equipment is provided and precautions are taken prior to or at the start of the job, not after problems have been encountered <input type="checkbox"/> Job supervisors are trained in planning for safety 	<ul style="list-style-type: none"> <input type="checkbox"/> Pre-job safety planning is required prior to mobilization <input type="checkbox"/> Safety equipment and safety procedures are provided when needed <input type="checkbox"/> A check list is used as a guide 	<ul style="list-style-type: none"> <input type="checkbox"/> Little or no formal pre-job safety planning program but some planning is done 	
I. Employee Participation. Review documents including copies of programs in safety manuals and/or employee policies and procedures manuals, training records, safety toolbox talks sign-in sheets, employee incentive programs, and employee suggestion boxes. Conduct random employee interviews.			
Superior Level 3	Transitional Level 2	Entry Level 2	Score
<ul style="list-style-type: none"> <input type="checkbox"/> Employee participation program in place <input type="checkbox"/> Supervisors trained to facilitate employee participation <input type="checkbox"/> Procedures set up for employees to participate in activities (e.g., see next column) ranging from training to accident investigations 	<ul style="list-style-type: none"> <input type="checkbox"/> Supervisors trained to facilitate employee participation <input type="checkbox"/> Employees encouraged to participate in tool box talks, hazard recognition/reporting, site inspections, safety rule development/revision, new hire & formal safety training, and accident investigations 	<ul style="list-style-type: none"> <input type="checkbox"/> Employee participation is encouraged <input type="checkbox"/> Information is given to supervisors on how to involve employees 	
J. New Employee Orientation. Review documents such as orientation agendas and program materials, class rosters, safety manuals, employee handbooks and training videos.			
Superior Level 5	Transitional Level 4	Entry Level 1	Score
<ul style="list-style-type: none"> <input type="checkbox"/> Formal orientation program is in effect for all new or transferred employees <input type="checkbox"/> Records maintained showing date, person doing orientation and items covered <input type="checkbox"/> Orientation includes training on safety rules, HAZCOM, major job hazard exposures, PPE, and emergency reporting procedures <input type="checkbox"/> Employer concern for safe job performance is stressed <input type="checkbox"/> Employee signs record sheet 	<ul style="list-style-type: none"> <input type="checkbox"/> Orientation that includes information on safety is given to new employees <input type="checkbox"/> Documentation showing items covered is maintained <input type="checkbox"/> Orientation includes training on safety rules, HAZCOM, major job hazard exposures, PPE, and emergency reporting procedures <input type="checkbox"/> Job safety requirements are stressed 	<ul style="list-style-type: none"> <input type="checkbox"/> Orientation is given to employees but no training records are maintained 	

K. Safety Rules. Review documents such as job-site rules, safety manuals, contracts, and employee handbooks. Conduct random employee interviews.

Superior Level 5	Transitional Level 4	Entry Level 3	Score
<ul style="list-style-type: none"> <input type="checkbox"/> Rules are in writing and are communicated to all employees <input type="checkbox"/> Rules are concise and easy to understand <input type="checkbox"/> Rules are enforced equally among all employees <input type="checkbox"/> Rules are updated on a regular basis <input type="checkbox"/> Subcontractors must follow safety rules. 	<ul style="list-style-type: none"> <input type="checkbox"/> Rules are in writing and are communicated to all employees <input type="checkbox"/> Copies of rules are posted or available to all employees <input type="checkbox"/> Supervisors enforce most of the rules <input type="checkbox"/> Subcontractors must follow safety rules. 	<ul style="list-style-type: none"> <input type="checkbox"/> There are some general rules <input type="checkbox"/> Rules are enforced most of the time <input type="checkbox"/> Rules have not been updated within past two years 	

L. Employee Safety Training. Review the safety training records of two randomly-selected employees.

Superior Level 3	Transitional Level 2	Entry Level 2	Score
<ul style="list-style-type: none"> <input type="checkbox"/> Based on training needs assessment, formal safety training is provided and documented in areas such as hazard recognition, first aid/CPR, hazard/standard specific OSHA topics, vehicle and heavy equipment and trade specific safety (such as electrical safety, etc.) <input type="checkbox"/> Formal safety training conducted by competent or qualified safety personnel <input type="checkbox"/> Employee training comprehension/ understanding is verified and documented 	<ul style="list-style-type: none"> <input type="checkbox"/> Some formal safety training provided and documented in areas such as first aid/CPR. <input type="checkbox"/> Informal safety training conducted by competent or qualified safety personnel. 	<ul style="list-style-type: none"> <input type="checkbox"/> Some formal safety training, with verifiable records provided In hazard recognition <input type="checkbox"/> Some informal safety training provided for categories found in far left column 	

M. Inspections. Review inspection records. Conduct random employee interviews.

Superior Level 5	Transitional Level 3	Entry Level 1	Score
<ul style="list-style-type: none"> <input type="checkbox"/> Weekly site inspections are made by the site supervisor <input type="checkbox"/> Critical safety hazards are identified and checked <input type="checkbox"/> Vehicle Inspections are conducted and submitted daily. <input type="checkbox"/> Corrective Actions are tracked to completion <input type="checkbox"/> Dates are set for assess corrective action effectiveness 	<ul style="list-style-type: none"> <input type="checkbox"/> Monthly job site inspections are made by an employer representative <input type="checkbox"/> A report on the results is filed <input type="checkbox"/> Follow-up corrective action is taken 	<ul style="list-style-type: none"> <input type="checkbox"/> Informal job site inspections made occasionally by the site supervisor with no reports submitted 	

N. Supervisory Training. Review documentation of supervisory training.			
Superior Level 14	Transitional Level 6	Entry Level 4	Score
Supervisory training includes: <input type="checkbox"/> First Aid/CPR <input type="checkbox"/> Hazard Recognition <input type="checkbox"/> Emergency Reporting <input type="checkbox"/> General Industry Hazard Recognition Training <input type="checkbox"/> Conducting Meetings <input type="checkbox"/> Supervisory Skills <input type="checkbox"/> Accident/ Incident Investigation <input type="checkbox"/> Job Safety Analysis <input type="checkbox"/> Job Safety Planning <input type="checkbox"/> Train-the-trainer <input type="checkbox"/> Site Safety Inspections <input type="checkbox"/> Company has in-house facilities for training or has good outside training source <input type="checkbox"/> Professional development courses offered <input type="checkbox"/> Supervisors have access to dedicated safety staff or other safety professional	Most supervisors receive training in: <input type="checkbox"/> Hazard Recognition <input type="checkbox"/> First Aid/CPR <input type="checkbox"/> Emergency Reporting <input type="checkbox"/> Supervisory Skills <input type="checkbox"/> Accident/ Incident Investigation <input type="checkbox"/> Site Safety Inspections	<input type="checkbox"/> Some supervisors are sent to outside training courses	
O. Accident Investigation. Review documents such as accident investigation and near miss forms, recommendation reports written following an accident investigation, materials company publishes following accidents, etc. Conduct random employee interviews.			
Superior Level 7	Transitional Level 4	Entry Level 4	Score
<input type="checkbox"/> Accidents and near misses are investigated by site supervisor <input type="checkbox"/> All supervisors are trained in the techniques of accident investigation <input type="checkbox"/> Reports are completed for all accidents <input type="checkbox"/> Employer reviews all accidents that exceed a set cost <input type="checkbox"/> The basic causes of all accidents are determined <input type="checkbox"/> Information learned is shared with all job sites <input type="checkbox"/> There are follow-up steps to assure corrective action is taken	<input type="checkbox"/> All accidents are investigated with a report written <input type="checkbox"/> Supervisors are trained to make investigations <input type="checkbox"/> Employer reviews all investigation reports <input type="checkbox"/> Information on "serious" incidents is shared with employees on all job sites	<input type="checkbox"/> Informal investigations are made with no written report <input type="checkbox"/> Some supervisory personnel know how to investigate an accident <input type="checkbox"/> Information gained is not shared on all other job sites <input type="checkbox"/> Persons other than the site supervisor conduct most investigations	

P. Use of Personal Protective Equipment (PPE). Review documents such as training agendas, safety manuals, safety policies, job-hazard analysis where PPE is identified, invoices, etc. At job site, concentrate on housekeeping, wearing of PPE, location of MSDS books.

Superior Level 6	Transitional Level 3	Entry Level 2	Score
<input type="checkbox"/> Assessments made to determine PPE needs <input type="checkbox"/> Employees trained in use and maintenance of PPE <input type="checkbox"/> Approved PPE used <input type="checkbox"/> PPE provided for employees <input type="checkbox"/> Employees aware of disciplinary consequences of not using PPE <input type="checkbox"/> PPE needs assessed annually	<input type="checkbox"/> PPE is provided and use is required <input type="checkbox"/> Employees trained in use and maintenance of PPE <input type="checkbox"/> Employees informed of PPE requirements for each job	<input type="checkbox"/> PPE is provided and its use encouraged <input type="checkbox"/> Some training is given in use and maintenance of PPE	

Q. Performance Audits. (Performance audits are not site inspections, but audits to evaluate segments (or all) of a safety program.) Review documents such as quality improvement materials, safety benchmarking reports, reports of an activity that was modified and its safety-related results. Conduct random employee interviews.

Superior Level 4	Transitional Level 3	Entry Level 2	Score
<input type="checkbox"/> Safety program is reviewed at least annually to determine if it is producing desired results <input type="checkbox"/> Criteria against which performance is measured are established <input type="checkbox"/> Results of performance review become part of overall rating of supervisors <input type="checkbox"/> Strong points and shortcomings are discussed with individual supervisors	<input type="checkbox"/> Safety programs is reviewed annually to determine if it is producing desired results <input type="checkbox"/> Performance criteria exist for more than half of the areas measured <input type="checkbox"/> Results are discussed with individuals supervisors	<input type="checkbox"/> Subjective review of safety activities made to judge if they are effective <input type="checkbox"/> Rating given to each area audited	

R. Substance Abuse Policy. Review documents such as safety manuals and/or employee manuals that provide the policy, employee assistance program, etc.

Superior Level 4	Transitional Level 2	Entry Level 1	Score
<input type="checkbox"/> Company policy contains strict rules regarding drug and alcohol use <input type="checkbox"/> Company does drug testing for pre-hire, post accident and for cause <input type="checkbox"/> Company keeps counseling and testing records <input type="checkbox"/> Company has an Employee Assistance Program	<input type="checkbox"/> Company has substance abuse verbiage in company policy <input type="checkbox"/> Supervisors are trained in hazards of drugs and alcohol on the job	<input type="checkbox"/> Company has policy but makes no effort to enforce policy	

S. Motor Vehicle Safety Policy: Review documents such as manuals and/or employee manuals that provide the policy. Conduct random employee interviews.

Superior Level 5	Transitional Level 3	Entry Level 1	Score
<input type="checkbox"/> Company developed and implemented a Written motor vehicle safety policy. <input type="checkbox"/> Company provides formal defensive driving training that includes driving hazards. <input type="checkbox"/> Company requires accident and near miss Reporting and investigation. <input type="checkbox"/> Company has implemented a fleet Maintenance policy. <input type="checkbox"/> Driving Records are reviewed annually.	<input type="checkbox"/> Company has safe driving verbiage in their safety program. <input type="checkbox"/> Company includes vehicle safety in their orientation. <input type="checkbox"/> Accidents and near misses are reported.	<input type="checkbox"/> Company has Motor Vehicle Safety policy, but makes little effort to enforce policy	

T. Record-keeping. Review documents such as Summary OSHA 300 Logs, employee attendance records, and records of first aid cases. Conduct random review of employee records.

Superior Level 8	Transitional Level 4	Entry Level 1	Score
Records are kept on: <input type="checkbox"/> Inspections <input type="checkbox"/> Training <input type="checkbox"/> Orientations <input type="checkbox"/> Accident Investigations <input type="checkbox"/> First Aid Treatment <input type="checkbox"/> OSHA Log-Forms 300 and 300A <input type="checkbox"/> Hazard Communication Program <input type="checkbox"/> Employee Absences	Records are kept on: <input type="checkbox"/> OSHA Log-Forms 300 and 300A <input type="checkbox"/> Accident Investigations <input type="checkbox"/> Inspections <input type="checkbox"/> First Aid Treatment	<input type="checkbox"/> OSHA Log-Forms 300 and 300A are maintained according to OSHA requirements	

EVALUATION SCORING MATRIX

Yes/No

- _____ Satisfactory filing of all requested material to validate self-evaluation score?
- _____ Company submitted copy of Summary OSHA 300 Log? Most recent 3 years.
- _____ Submission of Experience Modification Rate (EMR) from Workers' Compensation Insurance Carrier for prior 3 year period?
- _____ Track Incident and Severity Rates? Most recent 3 years

		Self-Evaluation Score	Verification Score
A.	Employer Commitment		
B.	Employer Policy Statement on Safety		
C.	Responsibility for Safety Defined		
D.	Experience Modification Rate/Loss Ratio		
E.	Resources for Safety		
F.	Safety Program Goal Setting		
G.	Employer Supervisory Meetings		
H.	Pre-planning for Job Site Safety		
I.	Employee Participation		
J.	New Employee Orientation		
K.	Safety Rules		
L.	Employee Safety Training		
M.	Inspections		
N.	Supervisory Training		
O.	Accident Investigation		
P.	Use of Personal Protective Equipment (PPE)		
Q.	Performance Audits		
R.	Substance Abuse Policy		
S.	Motor Vehicle Safety Policy		
T.	Recordkeeping		
	TOTAL		

Award Levels based on point system:

- Entry 55-69
- Transitional 70-84
- Superior 85-100