



An Initiative of the
American Staffing Association
and National Safety Council

A RESOURCE GUIDE

For the *Safety Standard of Excellence* Program

Table of Contents

Introduction.....	4
Staffing Industry Trends.....	4
The Case for Investment in Safety.....	4
Incident Statistics.....	5
Off-the-Job Safety.....	6
Workers' Compensation Insurance	7
Direct and Indirect Cost of Safety Incidents	8
Staffing Firm Safety Best Practices	8
Compliance with OSHA.....	8
Creation and Adoption of Temporary Worker Safety Best Practices	9
Worker Selection	10
Application Phase	10
Screening Phase.....	11
Fit to Job	11
Communication to Worker	12
Worker Training and Orientation	12
Information to Communicate	13
Safety Training Program Evaluation	14
General Safety Orientation.....	14
Verification of Client Responsibilities for Worker Training and Orientation.....	15

Changes in the Job	15
Site-Specific Safety Orientation	16
On-The-Job Training	17
Evaluation of Client Safety.....	17
Safety is a Journey	18
Evaluators	22
Worksite Evaluation Forms.....	23
Safety Performance Indicators	24
Calculating and Comparing Incident Rates.....	25
Safety and Health Programs	27
Evaluating Job Risk.....	28
Assessing risk	29
Job safety analysis	30
Hierarchy of hazard controls	31
Management Commitment to Safety.....	34
Worker Involvement in Safety.....	35
Frequency of Worksite Evaluation.....	38
Communication of Hazards to Client.....	39
Impact on Business Decision	40
Tracking Temporary Worker Safety Incidents	40
Incident Management	41
Injury Reporting.....	41
Triaging Injured Workers	42
Directing Care	43
Incident Investigation	43
Injury Tracking and Claims Management	45
Return to Work	45
Modified Duty.....	46
Verification of Client Responsibilities for Incident Management.....	47
Injury Protocols.....	47
Timeliness of Reporting	48
Client Cooperation in Incident Investigation, Implementation of Corrective Action, and.....	48

Accommodating Return to Work.....	48
Contracts.....	49
Client Responsibilities.....	50
Staffing Firm Responsibilities.....	50
Staffing Firm Rights.....	50
Inclusion of Safety in RFQ Language.....	51
Nurse Staffing	51
Application Phase	51
Screening Phase.....	51
Training.....	52
Client Evaluation.....	52
A Final Word about Continuous Improvement	52

Introduction

Staffing Industry Trends

The staffing, recruiting, and workforce solutions industry makes a vital contribution to the U.S. economy, and provides outstanding job and career opportunities for some 16 million employees per year. Visit americanstaffing.net to see the facts and statistics for staffing companies and employees.

In the U.S., there are about 20,000 staffing and recruiting companies, which altogether operate around 39,000 offices. Approximately 55% of companies and 74% of offices are in the temporary and contract staffing sector of the industry.

ASA is committed to protecting the rights, safety, and well-being of temporary workers—and educating staffing companies, their clients, and temporary workers about temporary worker rights and employer responsibilities under the Occupational Safety and Health Act. Learn more about temporary worker safety and our alliance with OSHA below.

The Case for Investment in Safety

Promoting and ensuring temporary worker safety and well-being is the responsibility of every staffing firm. In 2013, the U.S. Occupational Safety and Health Administration launched its Temporary Worker Initiative focused on compliance with safety and health requirements when temporary workers are employed under the joint or dual employment of a staffing firm and a host employer. According to OSHA, *both* host employers and staffing firms have roles in complying with workplace health and safety requirements and they *share* responsibility for ensuring worker safety and health.

By participating in the Safety Standard of Excellence program, staffing firms, their temporary workers, and host employers can build knowledge and a mutually beneficial relationship that will identify and mitigate or even eliminate workplace hazards and exposures, ensure clear communication between the staffing firm and host employer, and clearly delineate responsibilities of each party—all intended to reduce temporary worker injuries, illnesses, and fatalities.

The importance of safety in business goes beyond compliance. Safety is a value, an opportunity to engage all workers in a journey that prevents harm, promotes productivity and contributes to operational excellence and profitability. As one of the founders of the National Safety Council, Robert W. Campbell once said, “Safety work is today recognized as an economic necessity, and one of the most constructive movements that has ever come into our national life. It is the study of the right way to do things.” Those words are as true today as they were in 1914. To create a culture grounded in safety, the belief in “the right way to do things” must be embraced at every level of an organization, by every branch location, and every worker.

Each of the factors listed below play a role in the importance of establishing and maintaining a safety management system. Consider these when you set your safety vision, communicate your plan to all workers, and determine how you will measure performance and return on investments in safety.

Financial: A priority for all staffing firms is how to increase bottom-line performance. Effective safety and health efforts contribute to a healthier, higher performing workforce. This has direct bearing on productivity,

quality, and efficiency, all of which lead to improved profitability. In addition, costs of insurance, safety initiatives, and training need to be considered alongside these potential benefits.

Humanistic: Staffing firms are in the people business. The work of a firm means dealing with people, not financial statements and profit and loss. When management demonstrates real concern for the safety and well-being of its people, it engages all workers in a caring manner where safety becomes a shared responsibility. The result is a highly effective, collaborative process of continuous improvement that enhances morale and a culture of safety.

Regulatory: Smart staffing firms understand that regulatory requirements represent minimum standards that they must comply with and that their safety management systems should set a far higher expectation for disciplined performance. A commitment to a rigorous safety management system can fulfill the regulatory requirements of such agencies as OSHA and DOT. Unfortunately, there are some staffing firms that do not understand the requirements and they are subject to enforcement, violations, penalties, and in the most egregious situations, criminal punishment.

Public Relations: Clients, business partners and communities expect staffing firms to be responsible and do no harm. The consequence of poor safety management, and temporary worker injuries and fatalities, is turnover, poor client relations, compromised quality, and public distrust. In today's society, the ease of information sharing makes it possible for even the smallest infraction to quickly damage a staffing firm's image.

Organizations that commit to safety as a value and integrate safety into all aspects of the business have proven to be more profitable. As safety improves, so does quality, efficiency, and productivity. High performing workforces and workplaces experience fewer injuries, reduced business interruption, and better outcomes. They also create stronger engagement with workers so they develop and thrive, enhancing a firm's business results.

Research has shown that businesses that find ways to engage workers in meaningful ways have people who are more motivated to contribute to the organization's performance and less likely to look for employment elsewhere. And safety is a great way to develop that engagement that in turn leads to positive outcomes for other important business initiatives such as retention and longevity.

Additionally, investing in your safety management system makes a measurable impact on your bottom line. OSHA estimates that implementation of a safety management system will save U.S. businesses between \$9-\$23 billion in annual workers' compensation claims, which are only more aggravated by the rising cost of medical care. This represents a significant competitive advantage for the staffing firms that achieve these and other savings associated with reduced injuries and illnesses.

Putting an infrastructure in place to support a system of continuous improvement makes sense in any industry, even if perceived risk is low. According to Liberty Mutual, \$1 invested in safety has a \$3-\$6 return on investment. Safety provides the necessary foundation on which staffing agencies can grow and prosper.

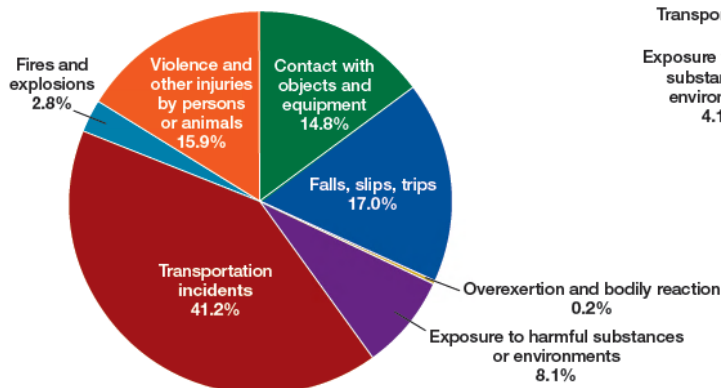
Incident Statistics

Staffing firms need to be certain that they are collecting data on all workplace incidents so that root causes can be determined and corrective actions taken at the client site to prevent similar incidents from occurring.

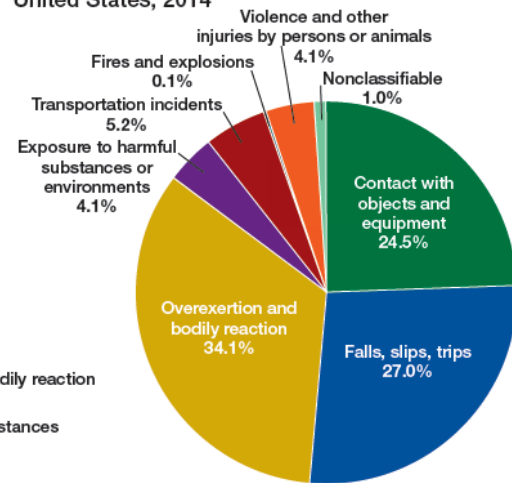
Looking across industries at the most frequent causes of disabling injuries (injuries with days away from work) and fatal injuries, it's clear that there are common causes of concern. Every staffing firm needs to consider its own leading causes and prioritize hazard control and risk reduction efforts accordingly.

While the following chart focuses only on injury causes, staffing firms must also consider possible occupational health exposures temporary workers may be exposed to that can lead to illness. In fact, occupational illness in the workplace is estimated to cause more than 50,000 fatalities and 420,000 illnesses annually, with the estimated cost at 60 billion dollars.

Deaths^a by event or exposure, United States, 2014



Cases with days away from work^b by event or exposure, United States, 2014



Source: Bureau of Labor Statistics.

^aIncludes deaths among all workers.

^bIncludes cases with days away from work among private-sector wage and salary workers. Excludes government employees, the self-employed, and unpaid family workers.

^c"n.e.c." means "not elsewhere classified."

Off-the-Job Safety

While staffing firms aren't legally responsible for the safety of workers in their homes and communities, what happens to workers off the job affects the ability for firms to operate efficiently. Unfortunately, once workers leave the work facility for the day, they are at greater risk for injury and illness.

In 2014, an estimated total of more than 136,000 people died from unintentional injuries in the United States. Of these, more than 4,000 deaths occurred in the American workplace. Although the motor vehicle death rate has declined, there are still far too many fatal motor vehicle crashes with more than 35,000 people losing their lives. Additionally, 98,600 deaths occurred in the home and community. Of all the unintentional deaths, only 3% occurred at work.

Off-the-job nonfatal injuries also affect millions of American workers. Nine out of ten deaths and about 75% of the medically-consulted injuries* suffered by workers in 2014 occurred off the job.

Production time lost due to both fatal and nonfatal off-the-job injuries totaled about 270 million days in 2014, compared with 65 million days lost by workers injured on the job. Off-the-job injuries to workers cost the nation at least \$339.4 billion in 2014 compared to \$140 billion for on-the-job injuries.

Off-the-job illnesses and injuries significantly impact businesses. It is in every employer's best interest to do as much as possible to protect temporary workers and their families both on and away from their jobs. Staffing firms may consider the following, designed to encourage temporary workers to take their on-the-job safety practices and knowledge home with them:

- Offer safety training that can be applied in every environment and distribute handouts
- Where possible, allow workers the opportunity to borrow PPE and other safety equipment for use at home
- Consider including safety tip inserts in worker paychecks
- Make subscriptions to health and safety newsletters and periodicals part of a worker benefit package
- Offer safety program incentives that can be used by the whole family

Your workers are your staffing firm's most valuable resource. Their health and safety both on and off the job should be one of your greatest concerns. A truly comprehensive safety management system takes safety into account 24/7.

Workers' Compensation Insurance

Without workers, a staffing firm wouldn't exist. Their health and well-being can determine your firm's success or failure, particularly for smaller firms. Workers' compensation insurance not only protects your firm from the financial impact of a temporary worker injury or death, but should also offer support to help you reduce the frequency and severity of such events.

Workers' compensation insurers should ask questions about the industries and clients you service, the nature of the work your temporary workers are asked to perform, and proactively provide you with resources that fit the risks unique to your staffing firm.

Some of the services offered by insurers, or even your insurance broker, which you should inquire about and avail yourselves of, include:

- Identifying proper WC classification
- Risk management education
- Safety training (OSHA, Defensive Driver, etc.)
- Return-to-work programs
- Drug-free workplace programs
- Monthly reporting on claims
- Assistance with OSHA 300 log preparation
- Legal consultation services
- Hotline
- Discounted background and Motor Vehicle Record (MVR) checks
- Discounted services for staffing firms that have earned the Safety Standard of Excellence mark

Many of these services are available for no charge yet staffing firms may not know they are available. Take time to exhaust the list of services your WC insurer and/or broker many provide.

Many insurers will not write coverage for certain types of staffing placements—usually those considered higher risk. In this case, your insurance agent or broker should be able to find suitable coverage for those cases where you may be placing workers in higher-risk jobs.

Direct and Indirect Cost of Safety Incidents

Staffing firms incur both direct and indirect costs when workers are injured. Direct costs typically include Workers' Compensation expenses that cover wage replacement, medical care, return to work, rehabilitation, and litigation. Indirect costs are more difficult to quantify, but estimates generally include hiring and training of replacement personnel, reduced productivity, cost of overtime to make up for lost production, loss of business opportunities, decreased morale, and other intangibles reflected in the increased cost of doing business. Indirect costs of injury are estimated to range from one to five times the magnitude of direct costs, depending on the type of industry and organization involved.

The business case for safety is clear. Working to constantly improve safety policies, practices, and culture will significantly save both direct and indirect costs, improve productivity, and lead to business excellence.

Staffing Firm Safety Best Practices

The Safety Standard of Excellence program is designed to encourage staffing firms to adopt workplace safety best practices and standards as well as to foster and measure continuous safety improvement. The Program's purpose is to help reduce the rate and severity of staffing firm temporary workers' workplace injuries; help control staffing firms' workers' compensation costs; and enhance the image of the industry with respect to job seekers, staffing clients, the government, and media.

There are two general ways to encourage staffing firm safety improvements— compliance and adoption of best practices.

Compliance with OSHA

Compliance is handled largely by the Occupational Safety and Health Administration (OSHA) pursuant to the OSH Act of 1970 and, more recently, the OSHA Temporary Worker Initiative (TWI) announced in April 2013.

TWI came about because of OSHA's concerns that:

- Some employers may use temporary workers as a way to avoid meeting all their compliance obligations under the OSH Act and other worker protection laws;
- Temporary workers get placed in a variety of jobs, including the most hazardous jobs; that temporary workers are more vulnerable to workplace safety and health hazards and retaliation than workers in traditional employment relationships
- Temporary workers are often not given adequate safety and health training or explanations of their duties by either the temporary staffing agency or the host employer.

The details of TWI and its associated bulletins can be found [here](#). They are also detailed on the Safety Standard of Excellence portal [here](#).

The main message of the TWI is that staffing agencies and host employers are jointly responsible for maintaining a safe work environment for temporary workers—that is, jointly responsible for ensuring that OSHA's training, hazard communication, and recordkeeping requirements are fulfilled. Section 5(a)(1) of the Occupational Safety and Health Act states "*that each employer shall furnish to each of his workers employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his workers.*" Both the temporary employer and the host employer can be cited, therefore, if OSHA finds that both employers were responsible for violative condition(s).

A key concept underscored by TWI is that each employer should consider the hazards it is *in a position to prevent and correct*, and in a position to *comply* with OSHA standards. For example: staffing agencies might provide general safety and health training, and host employers provide specific training tailored to the particular workplace equipment/hazards.

- The key is *communication and collaboration* between the agency and the host to ensure that the necessary protections are provided.
- Staffing firms have a duty to inquire into the conditions of their workers' assigned workplaces.
- Staffing agencies need not become experts on specific workplace hazards, but they should determine what conditions exist at the client worksite, what hazards may be encountered, and how best to ensure protection for the temporary workers who will be placed there.
- The staffing agency has the duty to inquire and *verify* that the host has fulfilled its responsibilities for a safe workplace.
- And, just as important: Host employers *must treat temporary workers like any other workers* in terms of training and safety and health protections.

But compliance does not always equate to a safe workplace. By its very nature, compliance details the minimum requirements by law for the safety of temporary workers and therefore, can breed a “good enough” mentality around safety. Staffing firms without any or few OSHA citations can fall into the trap of thinking they’re a “safe” organization, leading to complacency, thinking the standard is being met. Understand that being compliant with OSHA will lead to mediocrity at best. If you study what OSHA says, do just that much, and end your firm’s safety endeavors there, you’ve defined “safety” as the avoidance of OSHA citations and fines, or successful defense against them. Likewise, if you comply with what’s prescribed by TWI, you’d just be on par with others in your industry. Surely there’s more to the safety of temporary workers than just what OSHA has to say about it.

Creation and Adoption of Temporary Worker Safety Best Practices

To give staffing firms something to aim for and aspire to with regard to protecting temporary workers, it is first necessary to identify industry safety best practices and classify them in meaningful ways. There are three primary sources the Safety Standard of Excellence program used to determine what the best practices should be:

- ASA Best Practices and Model Contracts
- NSC *Journey to Safety Excellence*, Campbell Award criteria, and safety management systems
- Staffing industry leaders’ practices

By approaching safety through definition of best practices and encouraging staffing firms to hold each other accountable, the best firms can share and learn from each other's safety practices and measure themselves against this higher standard. It also has the effect of garnering the attention of staffing firms that may be in need of more help getting to the next level of safety. In essence, raising the bar for the industry leaders should have the effect of pulling up the rest of the industry, or at the very least producing more of a gap between mediocre staffing firms and the "bad players."

This best practices approach leads to a desire for continuous improvement, to be the best there is. Safety – by contrast to the compliance method of motivation - becomes a competitive advantage to be leveraged over the rest of the industry. If WC costs are significantly lower for staffing firms following best practices, they will spend less on injuries, insurance, recruiting and retention, making them more profitable, have a better reputation, and attract higher caliber clients.

So now we will begin looking at the SSE best practices which are a combination of both compliance activities and best practices since both are applicable and essential to achieve higher levels of safety for temporary workers.

The SSE best practices are grouped into categories that follow natural staffing firm business operations. From the best practices, the SSE program developed assessment criteria and measurement protocols by which staffing firms could be assessed.

The criteria are:

1. Staffing Firm Responsibilities for Worker Selection
2. Staffing Firm Responsibilities for Worker Training and Orientation
3. Staffing Firm Verification of Client Responsibilities for Worker Training and Orientation
4. Staffing Firm Evaluation of Client Safety Culture, Safety Performance, Work Site, and Job
5. Staffing Firm Responsibilities for Incident Management
6. Staffing Firm Verification of Client Responsibilities for Incident Management
7. Contracts
8. Nurse Staffing Firms (Sector-Specific)

A full list of all the criteria can be found [here](#).

Worker Selection

Perhaps one of the most critical components in ensuring your temporary workers' safety is the selection process. You need to find workers capable of doing the required job, those that are not impaired or impeded from performing the required tasks, and those that will be dependable and reliable. Worker selection criteria pertain to using all legally-available methods to screen candidates and match them to jobs they are capable of performing.

So let's begin by reviewing the SSE criteria for worker selection:

Application Phase

The application phase of worker selection starts with whether the staffing firm has outlined and documented a screening policy –a list of do's and don'ts about information that is legal to collect, questions that are

permissible by law to ask in an interview, and testing that can legally be done and under what circumstances. Having a written policy in place is the best practice, regardless of whether a staffing firm's forms, IT systems, or other work processes help with consistency across branch office operations. Therefore, the first criterion is:

(1c) Staffing Firm has written candidate screening policy and defined processes are established. Staffing Firm is following its own policy. Staffing Firm *collects* information from or about candidate during application process or post-conditional job offer (CJO) for purposes of candidate evaluation.

Screening Phase

The screening phase of worker selection has to do with using every legally-available means to thoroughly screen candidates. Many firms take their direction from their clients and do only what is required by the client. However, best practices (and common sense) would tell you that more might be better. For example, there are multiple panels of drug screens available. The standard 4- or 5-panel does not routinely test for opioids – a substance that is reaching epidemic proportions in our country. To see how your state (or the states you do business in) “score” with its fight against this problem, check out the National Safety Council report on it [here](#).

To test for opioids and other substances requires extra cost. But think about this. What is the cost of placing a worker under the influence of opioids in a job requiring driving? Is this best practice? Of course it isn't. But how would you know? States where the legalization of marijuana has occurred are having difficulty finding qualified workers who can pass a basic drug screen. They have to employ new tactics such as social media recruiting or increasing benefits to reach new or more qualified workers, increasing a staffing firm's cost.

A staffing firm's reputation with clients, however, is paramount. Does it pay to be the low-cost provider of temporary workers? In the end, it doesn't. Those firms will be out of business from mounting WC costs due to skyrocketing injuries because they didn't screen out workers with substance abuse problems, those with existing injuries, or those seeking to take advantage of the WC system. The screening process is in place first and foremost to protect the temporary worker but it also protects the staffing firm from taking on additional WC burdens from injuries.

With that, the following criteria have to do with candidate screening:

(1a) Staffing Firm has written drug testing policy for temporary and contract workers that adheres to best practices; results of drug testing impact employment offers.

(1b) Staffing Firm informs candidates of drug testing policy during the application process.

(1d) Staffing Firm uses candidate application data and evaluation techniques to thoroughly screen candidates and fit candidate to appropriate job.

Fit to Job

One of the situations that can lead to increased temporary worker injuries and higher WC costs is when a staffing firm does not conduct due diligence in matching the physical demands and skills required for the job

to a worker's capabilities. Some of this can be handled in the screening process and some of it can be discovered through other medical screening, where permitted by law.

The criterion related to fit to job is:

(1e) Candidates are informed about physical demands and essential job functions of each assignment; there is a system in place for the worker to verify that what they were hired to do (Staffing Firm description) matches with what the work is at the Client site; Staffing Firm has communicated a requirement for candidate to notify Staffing Firm immediately if job duties differ from those conveyed to them.

Communication to Worker

Another issue that can arise is when a staffing firm is given a job description by the host employer to recruit temporary workers with skills to match that job, and then upon arriving at the client worksite, the Client has the worker do something else. Staffing firms should have in place a mechanism to communicate pertinent job details to the temporary worker in advance of the commencement of the employment. Firms should also inform candidates that they should notify them immediately if the job duties differ from those described upon hire. Use of a small card with staffing firm contact information on it could assist in this notification process.

(1e) Candidates are informed about physical demands and essential job functions of each assignment; there is a system in place for the worker to verify that what they were hired to do (Staffing Firm description) matches with what the work is at the Client site; Staffing Firm has communicated a requirement for candidate to notify Staffing Firm immediately if job duties differ from those conveyed to them.

Worker Training and Orientation

Prior to OSHA's Temporary Worker Initiative, there was little guidance as to what training should be provided by staffing firms and what should be provided by host employers. As a result, various scenarios played out with OSHA ending up issuing citations to both entities. Since TWI, there has been a bit more clarification of roles as it pertains to the training of temporary workers. However, TWI still purports that both host employers and staffing agencies have roles in complying with workplace health and safety requirements and share responsibility for worker health and safety. OSHA has provided further clarification within several of their Technical Bulletins. Before getting into specifics, it may be helpful to talk about some general principles that may help govern decision-making when it comes to provision of training to temporary workers.

One helpful concept in determining whether a staffing firm or host employer is responsible for training is for each employer to consider the hazards it is in a *position to prevent and correct*, and in a position to *comply* with OSHA standards. For example, staffing agencies might provide general safety and health awareness training and host employers provide training specific to the actual workplace equipment and/or hazards that are likely to be encountered by the temporary worker. OSHA further indicates that the party in the best position to control the means and manner of work has an obligation to protect the worker performing it. This underscores the importance of identifying which entity is making decisions about the work and who is supervising it. These factors should be discussed prior to work commencing and would ideally be contractually described and/or outlined in the staffing firm's terms and agreement forms.

Another general principle following from the above is that staffing agencies have a duty to inquire into the conditions of their workers' assigned workplaces. They must ensure that they are sending workers to a safe workplace. Ignorance of hazards is not an excuse. Staffing agencies need not become “experts” on specific workplace hazards, but they should determine what conditions exist at their client (host) worksites, what hazards may be encountered, and how best to ensure protection for the temporary workers who will work there. Based on this inquiry, staffing firms will be in a position to determine what training may be necessary including awareness training, hazard-specific training, and training on PPE that may be required to protect against the hazard.

Finally, TWI makes one statement specific to host employer responsibilities for temporary worker training that is a great guiding principle—host employers *must treat temporary workers like any other workers* in terms of training and safety and health protections offered. So whatever training is provided to a host employer's workers, any contract or temporary workers should also receive such training. In the case of jobs that a host's workers no longer do (and are outsourced to temporary agencies to fill), the question would be whether their workers ever did the work and if so, whether training was provided then, and if so, what it was. For more guidance on staffing firm and host employer roles in training temporary workers, view this [case study](#) (login to the SSE portal first to view).

Information to Communicate

There are specific OSHA standards which cover training requirements depending on the industry, worksite, and job duties to which the temporary agency sends its workers. In general, however, it is the responsibility of the temporary agency to ensure that workers have received training before work begins so they know how to do their work safely, can identify hazards, and understand control and protective measures. TWI states that staffing firms should train workers on:

- The reporting process for all work-related hazards, injuries, or illnesses
- [Hazard identification and control](#)
- Generic [hazard communication](#) information and training
 - Hazard communication standard requirements applicable to the occupational setting the temporary worker is expected to encounter
 - Information on labels and other forms of warning
 - Format and content of safety data sheets (SDSs)
- [General personal protective equipment \(PPE\) information and training](#) (if PPE is required on the job)
- [Bloodborne pathogen information and training](#) (for workers with reasonably anticipated occupational exposure to blood or other potentially infectious materials (OPIM))
- Generic [powered industrial truck information and training](#) (for workers who will operate a powered industrial truck in their job)
- [Worker rights](#) if confronted with a hazardous situation at a worksite

In addition, staffing firms are responsible for ensuring workers receive adequate site-specific training. This means that staffing firms need to have a reasonable basis for believing the host employer's training will adequately address the potential hazards to which workers may be exposed, training on any PPE required, and site-specific emergency procedures.

Finally, all training provided must be in a language and vocabulary the worker understands and include a process to verify the training was understood. This verification process could include a knowledge test, performance test, or other methods to demonstrate the worker internalized the training presented.

Safety Training Program Evaluation

As far as evaluating the quality and effectiveness of a staffing firm's safety training process, safety training should be planned and implemented to assure a systematic and prescribed process is applied in a consistent manner for all placed workers. It should incorporate:

- Specific criteria that include:
 - Learning objectives that state desired knowledge, skill, or ability to be gained by the participant. Objectives should be measurable and observable.
 - Delivery methods that consider the background and experience of participants and learning objectives (lecture, hands-on training, demonstration, computer-based training, etc.).
 - Instructors and/or training developers who have technical knowledge, skills, or abilities in the subjects they teach, as well as being competent in adult learning instructional techniques and methods.
 - Trainers who are required to maintain professional competency by participating in continuing education or professional development.
 - Written documentation of evaluation methods used to verify the training has achieved learning objectives.
 - Training records in accordance with the established record keeping system.
- An annual training evaluation plan developed and implemented for each operating unit.
- Periodic staff training should be scheduled and should focus on the staffing firm's roles and responsibilities and what is necessary to lead the ongoing safety improvement process.
- Periodic needs analysis to determine what additional training might be needed, what may no longer be necessary, and what training may need revisions.

General Safety Orientation

In general, staffing firms are responsible for general safety orientation training while host employers typically provide more specific training pertaining to the hazards of the job, policies of the company, and procedures and safe use of equipment and PPE. Within the Safety Standard of Excellence program, the best practice criteria for training are:

(2a) Staffing Firm documents general safety orientation training for each worker placed.

(2b) Staffing Firm-provided general safety orientation:

- is provided in a language the worker understands,
- contains information on how to report and obtain treatment for on-the-job injuries and illnesses,
- contains how to report a workplace hazard,
- includes a process to verify training was understood.

Staffing firms should document the completion of all safety orientation training provided for each worker placed. Ideally this documentation should be easy to find and be verifiable at a staffing firm and branch office level. Percent compliance with training and documentation should be a metric all staffing firms track as it is one of their primary responsibilities in protection of temporary workers.

Regarding staffing firms' offering of training in a language the worker understands, many struggle to find cost-effective training for their multicultural and multilingual workforce. Often the training can incorporate demonstration, use of pictures or video, or interpreters to aid in the transfer of knowledge to workers whose first language is not English. Staffing firms should also consider how they would train a hearing- or sight-impaired worker if they needed to.

Staffing firms will want to communicate the process for reporting and obtaining treatment for on-the-job injuries and illnesses. Many times, the host employer will have their own procedures so it is important that workers understand who to report an injury or illness to, who else should be notified, who will notify them, and where they should seek treatment for an injury sustained on the job. Ideally the staffing firm and host employer will have collaborated on an agreed upon method for these and documented them so they can be relayed to the worker before placement.

Likewise, the orientation should communicate to workers what they should do if they spot a hazard at work and what their responsibilities are for reporting it promptly. Workers may feel they don't want to "rock the boat" and cause a fuss by reporting a hazard. Staffing firms should firmly underscore the necessity of doing so, however. Firms that convey the importance of vigilance when it comes to hazard identification and reporting will help clients unearth potential problems before they become incidents that can seriously injure others. Most clients will appreciate the attention to detail such workers provide and strengthen relationships with the staffing firm.

Verification of Client Responsibilities for Worker Training and Orientation

In practice, even when the temporary agency has provided basic training, the host employer provides the workplace-specific training appropriate to the workers' particular tasks. In order to fulfill its obligation under such circumstances, the temporary agency must have a reasonable basis for believing that the host employer's training adequately addresses potential hazards workers may be exposed to at the host worksite. This requires the staffing firm to: a) understand the hazards present at the potential client worksite; and b) inquire about the training a host employer will be offering to a firm's temporary workers prior to work commencing. In TWI language, the staffing agency has the duty to inquire and *verify* that the host has fulfilled its responsibilities for a safe workplace. As it pertains to training, this means the agency has an obligation to ensure the client will provide site-specific safety orientation and on-the-job training for the agreed-upon position. It also means that safeguards should be put in place to ensure the temporary worker actually works in the agreed-upon position or that notifications are made to the staffing firm if the nature of the work shifts in material ways.

Changes in the Job

It is not uncommon for temporary workers to be hired for one type of work, only to find out upon reporting for work that the client wants them to do different or additional work that was not part of the original agreement. One way to address this scenario is to communicate to the client that your staffing firm requires prior written approval if a workers' duties, equipment or worksites materially change. This could be done either contractually or in your firms' terms and agreements.

The other main issue with a client changing work duties, equipment, or worksites is that training may have only been provided for the originally-assigned job. Any time the worker changes any of these, additional training should be provided by the client. This would include a job transfer, work at a different worksite, operating a new piece of machinery or equipment, or use of different PPE as examples. A staffing firm should inquire about how clients normally handle such scenarios during the worksite evaluation but could also include such protections in contract or terms and agreements language. The Safety Standard of Excellence best practice criteria related to these concepts include:

(3a) Staffing Firm has communicated to Client that they require prior written approval if assigned workers' job duties, equipment, or worksites materially change; there is evidence that Client is doing this.

(3b) Staffing Firm has a system or contract language in place to verify to the best of its ability that training will be provided by the Client in the event of job transfers or material changes in normal job procedures/equipment.

Site-Specific Safety Orientation

TWI states that staffing firms have the duty to inquire and *verify* that the host has fulfilled its responsibilities for a safe workplace. While verification of whether training has actually taken place can be difficult for staffing firms, one way to address this is via the initial worksite evaluation and periodic worksite review documentation. Forms for the worksite evaluation can contain questions that ask the client whether training will be conducted for all placed workers and what the content of that training will entail. Staffing firm representatives can also ask to view client safety orientation training materials, inspect training records for other temporary workers that may have been placed in the past at that location, or view posted signs, posters, or work rules on their walkabout onsite. In the event a host employer is concerned about releasing material for proprietary reasons, you can ask to simply view it during an onsite evaluation or offer to sign a non-disclosure or confidentiality agreement first.

At a minimum, staffing firms should inquire whether clients train temporary workers on how to report an injury and obtain treatment for an injury, the client's emergency procedures including what to do for weather-related emergencies like hurricanes, high winds, tornadoes, or flood or workplace violence incidents such as active shooter scenarios. Firms can also ask about training on exit routes, shelter in place locations, eyewash stations, or other emergency-type procedures. Likewise, any client worksite or company-specific work rules should be included in temporary worker training including zero tolerance behaviors, attendance at shift meetings, or other rules non-temporary employees are subject to. Finally, any hazard communication programs a company has should be communicated to temporary workers prior to work commencing. This would include chemicals the client uses in work processes the temporary worker would likely be performing, the hazards associated with such chemicals, and protections offered. The Safety Standard of Excellence criteria related to staffing firm verification of client site-specific safety orientation training are:

(3c) Staffing Firm has in place a way to verify that Client's site-specific safety orientation:

- Will be conducted for all placed workers
- Includes Client information on how to report and obtain treatment for on-the-job injuries and illnesses, emergency procedures including exit routes, work rules, and hazard communication programs

On-The-Job Training

Under normal circumstances where the client is providing supervision for the work to be performed by the temporary worker, the client must also provide job-specific training since they control the means and manner of work. Staffing firms have a duty to understand what training will be provided and assess whether such training is adequate for the risks inherent in the described work. At a minimum, a staffing firm representative would understand what hazards would be present for the job, what PPE would be required to protect against such hazards, and what machinery or tools the worker would be using. In turn, that representative would inquire then about whether the client's training covers information specific to those job safety concerns. The Safety Standard of Excellence criteria related to a staffing firm's responsibility for verifying client provision of on-the-job training include:

(3d) Staffing Firm has in place a way to verify that Client's on-the-job training:

- Will be conducted for all placed workers
- Includes information specific to hazards of the assigned work, PPE required and how to use (if applicable), operational instructions for any machinery, tools, etc. worker will be using

Evaluation of Client Safety

One of the most crucial aspects of temporary worker protection involves a staffing firm's discretion in client selection. While some would argue that worker selection is the most important factor, it bears noting that workplaces and the cultures they exhibit can exert a tremendous amount of power over how a worker will behave once employed there. It is more apt that culture will change a worker's behavior versus a singular new worker changing the culture. Safety not only protects an organization's workers, it creates an optimal workplace where workers have every advantage to successfully perform their job. Therefore, it is paramount that a staffing firm spends the time and resources up front understanding the client's safety performance, safety culture, operations, and how well they control for hazards – collectively called a “safety management system.”

A safety management system is a continuous process that reduces hazards and prevents incidents. It is the core element that protects the health and safety of your workers and should be integrated into everyday processes throughout the host employer's organization. Just as staffing firms vary in their safety performance and practices, so do host employers. There are great staffing firms that hold safety as a core value, participate in best practice discussions, and work to continuously improve safety performance. “Good enough” isn't in their vocabulary...even one injury is too much. There are host employers that fit that description as well, with most falling somewhere in the middle. It could be argued that a staffing firm will “pay now” to perform a thorough vetting of new client safety performance or “pay later” in WC claims and increased premiums from inflated experience modification rates (EMRs).

The Safety Standard of Excellence proposes that the staffing firms who are better at evaluating client safety – and more discerning on where to place workers – will outperform those who don't adhere to such standards of safety excellence. Saying no to poorer performing clients even a small percentage of the time more often than competitors may end up paying huge dividends in saved WC costs, recruiting and retention costs, and industry reputation. So let's review how staffing firms can discern the various factors that influence host employer safety.

Safety is a Journey

It may help to begin with a review of what the National Safety Council knows about high performing workplaces, given its 100 plus year history of working with organizations of all sizes in safety improvement. While safety requirements may seem different across industries, exemplary companies—including staffing agencies—all have something in common. They are all on a journey, a cycle of improvement that aims for a continual reduction of risk with a goal of zero incidents. This is what the National Safety Council calls the *Journey to Safety Excellence*®. It is called a Journey because there is always opportunity for further progress and improvement—there’s no such thing as “safe enough.” Even organizations that have attained close to zero injury performance understand that they must continue the process of improvement lest risk be allowed to creep in when vigilance subsides.

Based on rigorous consideration of research as well as best practices of world-class companies, four key pillars make up the Journey and are critical for an organization to achieve safety excellence. These four pillars are interdependent and when fully integrated as a workplace safety strategy, have significant impact on protecting workers and enhancing organizational performance and profitability.

Leadership and worker engagement: Leaders foster a culture where safety is fully integrated in the business and is a core value where all workers are engaged and share responsibility.

Safety management systems: A strong safety management system is a framework of processes and procedures to ensure that work tasks are completed safely to achieve objectives.

Risk reduction: Risk is the combination of the probability of an event and the severity of the injury that may result. Risk is always present in the workplace and those staffing agencies who actively strive to reduce it will outperform those who do not.

Performance measurement: To manage improvement, it is essential to have measurable goals to track performance, looking at leading and lagging indicators and how they are related.

The Safety Standard of Excellence uses principles in these four pillars to help staffing firms evaluate a host employer’s safety. In the following sections, you will find a description of each of the pillars of the *Journey to Safety Excellence* and how they are integral to continuous improvement at a host employer location. It may be worth noting that the principles contained within the *Journey to Safety Excellence* is similar to the recently released OSHA “*Recommended Practices for Safety and Health Programs*” found [here](#) (login to the SSE portal to view). Those responsible for evaluating client worksite safety may need initial and periodic training to fully understand and adopt these fundamentals.

At the root of safety excellence is a balanced safety management system. A well-functioning safety management system should give consideration to administrative and managerial, operational and technical, and cultural and behavioral aspects of safety and health. Below are the organizational competencies for establishing and maintaining a successful safety management system as well as definitions for each. To assess a client location on these critical competencies and receive benchmark data on how they stack up to other employers, you may consider completing a *Journey to Safety Excellence* Safety System Assessment found in the “Encourage Host Employer Safety” section of the SSE portal.

Organizational Competencies

Administrative and Managerial	<ul style="list-style-type: none"> • Management Leadership and Commitment • System Management and Communication • Assessment, Audits, and Performance Measures
Operational and Technical	<ul style="list-style-type: none"> • Operational Processes and Procedures • Hazard Identification and Risk Reduction
Cultural and Behavioral	<ul style="list-style-type: none"> • Motivation, Behavior, and Attitudes • Workforce Involvement • Training and Orientation

Creating a safety management system is not different than other new product or program development. It starts with a vision or mission statement—one that is general and easy to understand. An example could be “commitment to zero injuries.” Once the vision is determined, an organization must develop a strategy to achieve the vision. They must then create policies and procedures to define the who, what, when, where, why and how of achieving the vision.

The ultimate safety management system is comprised of equal parts administrative and management, operational and technical, and cultural and behavioral aspects of safety and health:

Administrative and managerial elements address the “why” of managing safety. This is answered through leadership and commitment, measuring safety performance, and communicating the results of managing safety. These elements include:

Management Leadership and Commitment

- The National Safety Council Safety Management System calls for a personal commitment to safety—not only commitment to safety as a value, but commitment to the management factors that integrate that value into the culture. Executive management must be the first to accept the merits of improving the safety process—merits that include reduced injuries, reduced costs associated with injury, improved public image, increased morale, production, quality, and, ultimately, profitability.
- Acceptance of these merits is the personal factor in management’s commitment to safety. It is the factor that determines:
 - How willingly management invests resources in the improvement of the safety process.
 - The soundness of management’s accountability systems.
 - How effectively leadership will lead.

System Management and Communication

- A high level of communication facilitates the administration of an effective safety management system. It keeps workers informed about policies, procedures, roles, responsibilities, goals, and program results. It also fosters positive working relationships between the organization and the outside community.
- To be complete, communication must flow in two directions—from management to workers and from workers back to management. Additionally, accurate recordkeeping and documentation is

essential when generating reliable information for analysis, decision-making, and measuring continuous improvement.

Assessment, Audits, and Performance Measures

- An assessment process can provide management with constant and meaningful data on the effectiveness of the safety management system. Assessing the effectiveness of the safety management system is crucial to facilitating continuous improvement and reducing injuries and illness. A safety management assessment should objectively evaluate compliance with policies and procedures, quality and effectiveness of implementation, and any gaps in compliance or policy. It should also propose action plans for improvement.
- To be effective, all assessment findings must be reported, documented, and acted upon by management in a meaningful and timely manner. Assessments should be conducted at all levels of the organization. Team members should include individuals with assessment experience and necessary technical and management competencies.

Operational and technical elements are the “how” of safety management. Factors such as hazard control, workplace design, regulatory compliance, occupational health and environmental management are all addressed by operational and technical elements. These elements include:

Hazard Recognition, Evaluation, and Control

Effective hazard recognition, evaluation, and control are central to a successful safety management system. Hazard control is accomplished through a continuous process of identification, planning, implementation, and re-evaluation. It starts with the commitment and involvement of senior management through:

- Establishing a policy for ongoing recognition, evaluation, and control or elimination of workplace hazards in order to maintain an acceptable level of risk in the workplace.
- Developing a hazard control inventory.
- Establishing a hazard analysis procedure to identify existing and potential hazards, as well as conditions and operations in which changes might create hazards. Several tools may be used to do this based on organizational needs, including job safety analysis, safety inspections, risk assessments, industrial hygiene exposure assessments, incident investigations, process hazard analysis, and system safety reviews.
- Initiating hazard evaluation in which a hazard and the potential it has to result in an incident are analyzed. Once the hazard is evaluated, the best method of control (based on the risk assessment) can be selected and implemented.
- Designing and implementing control measures to bring risk to an acceptable level when worker exposure to health or physical hazards is found to pose an unacceptable risk. The best approach to take to accomplish this is to eliminate hazards at the design stage. If this is not feasible, then the following hierarchy of control measures should be applied:
 - Engineering controls
 - Administrative controls

- Personal protective equipment

Operational Processes and Procedures

Too often regulatory compliance is the only driving force behind many safety and health programs. But, a successful safety management system must focus beyond just satisfying compliance objectives and concentrate on managing risk to workers' safety and health along with regulatory compliance issues. In order to accomplish this:

- Regulatory compliance policies should be established for required occupational safety programs based on the needs of the organization.
- Management must determine the scope and nature of the organization's occupational health program and allocate resources to provide appropriate services. Management should develop program goals and establish functions, programs, procedures, and activities to meet the organization's occupational health goals.
- Successful safety and health programs must effectively manage and control external exposures. External exposures include any influences on risk that arise outside the boundaries of company property or are caused by a third party.

Cultural and behavioral elements address "who" is involved in such a system: all workers. This requires a cross-functional team approach involving all stakeholders. These elements include:

Worker Involvement

Workforce involvement in all phases of a safety management system benefits workers and management through performance improvements and increased acceptance and support of policies. Host employers should have ways to involve temporary workers in their safety efforts whether through creation of job safety analyses, serving on safety committees, participating in audits, or safety recognition programs.

- Management can facilitate a cooperative effort to improve a safety system through worker involvement in proactive safety activities and participation in the decision-making process.
- Management commitment to meaningful worker involvement can be demonstrated by establishing a policy for ongoing and meaningful worker involvement in proactive activities that focus efforts on recognition, evaluation and control, or elimination of workplace hazards.

Motivation, Behavior, and Attitude

Motivation gives workers the awareness, interest, and willingness to increase safety efforts and support organizational goals and objectives. Visible management leadership is important in changing worker attitudes and behaviors.

- Motivation, which commonly aims at changing behavior and attitudes, is generally defined by three factors: 1) direction of behavior, 2) intensity of action, and 3) persistence of effort.
- Two motivational approaches to improve safety and health performance are:
 - Organization behavior management (OBM) model—use of reinforcement and feedback to modify behavior.

- Total quality management (TQM) model—attitude adjustment methods used to achieve quality improvement goals in industry.

Training and Orientation

Safety training should be planned and implemented to assure a systematic and prescribed process (needs analysis, course design and development, and an evaluation strategy) is applied in a consistent manner. It should incorporate:

- Specific criteria that includes:
 - Learning objectives that state desired knowledge, skill, or ability to be gained by the participant. Objectives should be measurable and observable.
 - Delivery methods (lecture, hands-on training, demonstration, computer-based training, etc.) that consider the background and experience of participants and learning objectives.
 - Trainers who have technical knowledge, skills, or abilities in the subjects they teach, as well as being competent in adult learning instructional techniques and methods.
 - Trainers who are required to maintain professional competency by participating in continuing education or professional development.
 - Training delivery that incorporates adult learning principles appropriate for the target audience and learning objectives.
 - Written documentation of evaluation methods used to verify the training has achieved learning objectives.
 - Training records in accordance with the established record keeping system.
- An annual training plan developed and implemented for each operating unit.
- Periodic management training should be scheduled and should focus on management's roles and responsibilities and what is necessary for management to lead the ongoing safety improvement process.
- A formal safety orientation program that includes contractors and temporary workers should be provided prior to job assignment. The program should provide the attendee with sufficient skills and knowledge to enable them to perform their job safely. The program should include testing for comprehension and include periodic follow-up by the immediate supervisor.

Safety management systems require time to set up and manage throughout an organization; companies that have them are displaying their commitment to safety. Once the system is established, it provides efficiency and security that is well worth the time and resources invested to build the foundation and good clients understand this.

Evaluators

An assessment of a client's safety performance, culture, and worksite safety practices needs two things—a standardized assessment form and someone to evaluate what's on the form at the client location. While many staffing firms may have a safety director or even several safety professionals on staff, they often don't have the bandwidth to assess all new client locations in which temporary workers are placed. Many firms, therefore, use business development or sales staff to perform such evaluations.

Using business development or sales staff to assess client safety performance can pose some risks to a staffing firm. For example, without proper training and grounding in basic safety principles, most people unfamiliar with the science and practices of safety will not be able to properly identify workplace hazards or know how to correct for them. Therefore, it is essential that staffing firms provide fairly extensive safety training to staff conducting such assessments and provide as much structure as possible to the line of questioning and procedure for onsite inspection as possible.

Another potential problem with use of sales staff to perform client onsite assessments is the amount of turnover that these positions tend to experience. High training, high turnover positions are costly to staffing firms. What may prove beneficial to some staffing firms contemplating whether they can afford a safety professional on staff is to do a cost-benefit analysis comparing costs of a trained safety professional vs. cost to train and replace salespeople to perform similar work, using current turnover percentages in the equation.

The option that many firms have adopted is to hire a small group of safety professionals (or one, depending on size of the staffing firm), and require all onsite evaluation forms to be routed through such individuals before contracts can be signed. Staffing firms willing to give safety professionals this level of stature within their organizations send a powerful message that not just any client will do. It elevates the level of attention to safety to the point where screening of clients begins to happen earlier and earlier in the process, saving everyone time and money in scenarios where the client is simply not willing to change anything about the safety of their operations. It is far better in the long run financially to get to a quick “no”. That said, many safety professionals will highlight what might be problematic from the onsite evaluation, ask clarifying questions, perhaps talk to the client’s safety representative directly, and work toward a “yes”, meaning the staffing firm will do business with the client if certain criteria are met.

The Safety Standard of Excellence criterion related to evaluators of client safety is:

(4a) Select Staffing Firm staff is trained and capable of evaluating the host employer worksite; worksite evaluations are always performed by such trained staff.

Worksite Evaluation Forms

As stated above, the second part of client safety evaluation involves use of a standardized form. Particularly when safety professionals are not being used to directly observe client safety operations, use of standard questions, criteria, and forms will help tremendously. The use of such forms should help a staffing firm collect enough information to make an informed business decision about whether to place workers on that site. Ideally, use of such forms should also help firms increasingly differentiate good client safety from bad client safety. The form will also help in the event of an OSHA investigation. If the worksite evaluation is thorough, OSHA may be less likely to find fault with the staffing firm that did its due diligence in assessing safety.

That said, the form should not be so overwhelming as to take up too much client time to complete it with the staffing firm representative onsite. However, clients that are unwilling to assist in your assessment of their safety performance and completion of a proper onsite walkthrough should raise a red flag. Companies that care about safety will provide knowledgeable personnel to assist you in answering your questions. Those that can’t be bothered with your staffing firm asking such questions prior to bringing on temps will likely not be concerned with a temporary worker’s safety concern.

The Safety Standard of Excellence criteria related to client onsite evaluation forms is:

(4b) Staffing Firm uses a standard form for Client worksite evaluations that helps differentiate levels of safety among various Clients and worksites; form is comprehensive and adequately captures all pertinent information to make a business decision about whether to place workers at this Client and/or location.

Worksite risks can be identified by going to the worksite and looking at the physical work environment, machinery, tools, equipment, motorized vehicles, and observing the tasks, activities, and work situations a temporary worker will be exposed to. Based on what is observed, the staffing firm must also identify the hazard controls, safety programs, and work practices that are in place to prevent incidents from occurring. Even further yet, to make an informed business decision as to whether temporary workers should be placed at a host employer worksite, a staffing firm should do its due diligence in assessing a client's safety performance such as its incident rates, lost workday rates, and OSHA citations as well as gauging the overall client management commitment to safety and whether temporary workers will be included in the host employer's various safety programs, such as safety committees, audits or inspections, or participating in any safety incentive programs.

Let's take a look now at best practices regarding evaluation of a client's safety performance.

Safety Performance Indicators

A safety program's effectiveness is often measured solely on the basis of its failures. Many measurement systems focus on incidents that have occurred. Failure-focused measures such as the lost-time incident rate or lost-time severity rate can only indicate that problems exist; they don't identify what the specific problems are or how to solve them. Reactive measurements do not identify the specific problems or how to solve them. Examples of reactive data include:

- Incident rate
- Number of incidents reported and investigated
- Total workers' compensation costs
- Number of first aid cases
- Number of near misses or unsafe conditions reported and investigated

The ultimate goal of any safety program is to prevent or minimize failures. The programs that achieve the goal—the really effective safety systems—focus on activities that are positive, proactive, and designed to target the underlying causes of failures. It may take some extra effort on the client's part, but the resulting measurements are worth the effort required to find the data. Examples of proactive data include:

- Number of departments that have met safety training requirements
- Number of managers and workers trained in safety hazard recognition and incident investigation
- Scores on safety quizzes from training courses
- Number of meetings with safety included on the agenda
- Number of attendees at safety meetings

- Number of departments with written safety action plans
- Number of scheduled workplace inspections or audits completed
- Number of actions from workplace inspections completed

Additional proactive data that is used less often but should still be collected by client companies include:

- Number of safe acts reported and recognized
- Number of managers and workers with safety goals as part of performance expectations
- Number of safety inspections or walkthroughs by management
- Number of managers observing safety procedures

In safety, effective measurement should show a relationship between safety management and the number of incidents over time. For example, implementing job safety analyses should result in lower incidence rates, lower workers comp costs, fewer lost workdays, and lower expenditures. This example also proves that safety pays--when a company invests money, time, and other resources in safety, the result is reduced spending on incidents.

In addition to proving the value of safety, the data generated from measuring specific safety indicators can help clients pinpoint needed modifications in safety activities. The result of such measurements is a continuing improvement process that reduces incident rates.

Calculating and Comparing Incident Rates

One of the most telling pieces of data that you can collect from a client relates to incident rates. While this is data based on reactive activities, this information will provide a staffing firm with a baseline from which to measure changes in safety performance in their organization.

Incident rates can provide a common measure to compare industries, departments, facilities, and progress over time. In fact, the Occupational Safety and Health Administration, its compliance officers and the Bureau of Labor Statistics all use incident rates regularly to measure staffing firms, industry sectors, and workplace safety in general.

An incident rate is calculated using a simple formula. The formula is based on the premise that the average worker works:

- 2,000 hours per year
- 40 hours a week multiplied by 50 weeks a year
- and uses a company with 100 workers as the standard. The formula looks like this:

Incident rate = (No. of incidents X 200,000)

(Total number of hours worked in a calendar year where 200,000 is the number of hours worked by the standard 100-worker company)

÷ (No. of workers X 2,000)

(2,000 is the number of hours worked by the standard worker in a calendar year)

Incident rate = (No. of incidents X 200,000) ÷ (No. of workers X 2,000)

For example, a company with 350 workers, 5 incidents and 700,000 total hours worked would have an incident rate of 1.4.

The formula would look like this:

$$1.4 = (5 \times 200,000) / (350 \times 2,000)$$

This company's incident rate of 1.4 per 100 workers could then be compared to the national incident rate of 3.5, according to the Bureau of Labor Statistics. The Bureau puts the non-fatal incident rate for all private industries at 3.0 per 100 full time workers in 2015. The company in the example is well under the national rate for all industries.

The best client safety measurement systems combine reactive and proactive data. They will use reactive measures to benchmark their performance and proactive activities to identify necessary modifications for continuous improvement to their safety program. But it bears noting that not all client data will necessarily incorporate temporary workers. It is important to ask whether clients' incident rates include any injuries or illnesses from temporary or contract employees; likewise, it should be noted whether any activity-based measures kept by the client include temporary worker participation. Clients that make a point to involve temporary and contract workers in their activities and metrics are taking the level of responsibility necessary to provide the ultimate protection of your workers.

The Safety Standard of Excellence criterion related to measurement of a client's safety performance is:

(4c) Staffing Firm evaluates Client's safety performance, noting where temporary workers are included (where applicable).

Thus far, details have been provided on what safety data a good client might be tracking (and therefore what data might be available to a staffing firm to inquire about). For purposes of the Safety Standard of Excellence program assessment, the following client data should be captured (collected, viewed, or checked) by a staffing firm in order to minimally assess safety performance:

- Federal employer ID number
- WC classification code
- Experience modification factor (EMR)
- NAICS code
- OSHA 300 logs
- Incident rates
- OSHA violations, existence on [SVEP list](#) (Staffing Firm reviews the [Establishment Search](#) for previous citations)
- Whether host employer has completed hazard abatement for any existing OSHA citations or penalties
- Client IH programs, testing, and results (if required for placement) and whether Client will provide to Staffing Firm upon request
- Risk assessments (# performed, quantifiable risk reduction achieved, etc.)

- Client safety training completion and/or compliance records, documentation process and whether Client will provide records to Staffing Firm upon request
- What direction Client's overall safety performance is going (improving, worsening, plateauing?)

While some staffing firms may do this level of analysis only for high-hazard jobs, it is recommended that this data be captured for any new client and periodically checked thereafter. This allows the staffing firm to see trends in safety performance and whether there is improvement or deterioration over time.

Safety and Health Programs

In addition to checking the safety performance of client companies, other clues to the sophistication of their safety management systems are the safety and health programs they have in place. While some states require employers have a written injury and illness prevention program (AKA "IIPP" or "I2P2"), these programs can vary from company to company. The following section will detail some ideas for inclusion on a staffing firm's worksite evaluation to help differentiate good from bad safety performers.

Too often regulatory compliance is the only driving force behind many safety and health programs. However, a successful safety management system must focus beyond just satisfying compliance objectives and concentrate on managing risk to workers' safety and health along with regulatory compliance issues. To that end, the following are items about which to inquire:

- CA – Injury and Illness Prevention Program; WA – Accident Prevention Program; Others - written safety program
- Written safety policy
- Written safety rules
- Emergency procedures, evacuation plans, shelter in place plans, active shooter plans
- PPE programs
- Lockout/tagout
- Confined space
- Industrial Hygiene programs (hearing conservation, air quality, respirator)
- Ergonomics programs
- Housekeeping
- Spill containment and cleaning protocols
- Driving safety
- Injury/illness reporting
- Incident investigation
- Return to work
- Job rotation, shift work schedules, overtime records
- Bloodborne pathogens (noting Hepatitis B program, vaccinations required, whether sharps will be handled) where applicable

- Hazard communication
- Powered industrial trucks (PIT)
- Contract and temporary worker policy
- Compliance policies for mandatory occupational safety programs
- Stop work authority of workers

While some of the above may not pertain to the job for which you are placing workers, being knowledgeable about the existence of these programs will give you a sense of how well-controlled the risks are at the work site and how committed management is to safety. Organizations without these programs in place (or a good subset of them) should raise a red flag for safety and you may consider working with the client or encouraging them to improve their safety programming efforts. If clients ask a staffing firm to provide them with a written safety and health program, while it might be tempting to oblige to get to a “yes” if your firm or state law requires one, this is yet another warning sign that the client is wanting to outsource their responsibility for safety to a staffing company. It is best to point them to available resources such as OSHA’s or the National Safety Council *Journey to Safety Excellence* websites for assistance in creating their own.

As with the safety performance metrics, it is good to know whether temporary workers will be included in each of the safety and health programs the client has in place and whether or not the client will provide training or otherwise inform temporary workers about these programs. It’s great if they have them, but if a client has a job rotation plan for their own employees, for example, but isn’t willing to use the same schedule for temporary employees, that should be a concern.

The Safety Standard of Excellence criterion for staffing firm’s evaluation of a client’s safety and health programs is:

(4d) Staffing Firm notes Client’s current safety and health programs, whether temporary workers will be included in each, and whether they will be trained on each.

Evaluating Job Risk

Hazards are everywhere. Even the simplest of tasks can involve risk. The problem is that when the hazard is not eliminated or adequately controlled, the risk of injury increases. A successful safety management system depends on spotting these hazards early, evaluating the risk, and removing or controlling hazards before they can do harm.

Risk is the probability of an event occurring and the severity of the injury that may result. An example of high risk is a loose cord in the middle of a high traffic area while low risk might be a wrinkle in the carpet under a piece of furniture. We see examples of these throughout the workplace. Clients must be able to identify, evaluate, and eliminate or control these hazards before they cause injury and staffing firms must be able to gauge whether clients are good at doing so. If left uncontrolled, recognized hazards that produce no injury or a minor first aid injury today can produce a disabling or serious injury in the future – potentially to your temporary worker.

There are four basic types of workplace hazards – chemical, physical, biological, and ergonomic.

Chemical hazards result from chemicals that enter the body through inhalation, skin contact, absorption, injection, and ingestion. The best way to prevent a chemical hazard incident is to control the routes of entry into the body.

Physical hazards affect the body. These include excessive noise levels, vibration, radiation, fire, slips, falls, and temperature extremes and can have immediate and cumulative health effects.

Biological hazards result when a living organism or its properties causes an adverse response in humans. Biological hazards in the workplace come from agents such as infectious microorganisms, allergens, and toxins.

Ergonomic hazards generally refer to a mismatch between a workers' physical capacity and the design of a work area, equipment or tools, or the physical demands of the job. The physical injury resulting from repetition, forceful exertions, awkward postures, and vibration is a musculoskeletal disorder.

These hazards can be prevented in several ways such as:

- Fitting the job to the worker instead of the reverse
- Providing the right personal protective equipment for each type of hazard
- Training the worker to correctly perform his/her job

Hazard identification and control are at the core of successful injury prevention and require the following steps:

1. Collect and analyze data
2. Outline work processes involved in the business activity
3. Focus on hazardous work areas
4. Assess the degree of risk
5. Develop control steps for unsafe conditions
6. Determine priorities

Assessing risk

After being identified, hazards must be evaluated and assessed for risk. Assessing the risk of a hazard involves ranking its potential to cause an incident using the following elements:

Exposure considers the number of workers performing a job and the number of times a job is performed to determine the effect of a hazard. Is this task performed by a few workers a few times per day? Is this task performed by a few workers frequently? Or is this task performed by many workers frequently?

Probability refers to the probability of loss that occurs each time a job is performed. It is influenced by many factors, such as the hazards related to the job, the difficulty of performing the job, and complexity of the job.

Severity considers the effect most likely to happen if the job task is performed improperly. Would the effect be negligible, causing no injury or illness, no production loss, and no lost workdays? Would the effect be marginal with minor injury or illness? Would the effect be critical with severe injury, lost time, major property damage, yet no permanent disability or fatality? Or would the effect be catastrophic and include permanent disability or death?

In this evaluation, the key questions are, “How likely is it that things will go wrong when this job is performed? Is there a low, moderate, or high probability of an incident?”

The answers to the questions should lead to a ranking of each hazard. Some hazards will be ranked as an emergency with imminent danger that requires immediate attention, while others will be ranked with lower risk and a longer cycle for action.

Hazard risk assessment Risk Prioritization Matrix		HAZARD PROBABILITY				
		-A- Frequently	-B- Probable	-C- Occasional	-D- Remote	-E- Improbable
		Occurring often; high likelihood of occurring, no controls in place	Repeat occurrence; likely to occur; controls not used or ineffective	History of occurrence; may occur once, as secondary controls in place	Difficult to occur; unlikely but possible; reliance on work practices to control risk	Very difficult to occur; no history of occurrence, unlikely to occur
HAZARD SEVERITY		5	4	3	2	1
I - Catastrophic: An incident would result in death or uncontrolled environmental impact	5	EXTREME	HIGH	MEDIUM	LOW	
II - Serious/ Irreversible: Severe occupational injury or illness, or major system damage	4					
III - Serious/ Reversible: Occupational injury or illness, or major system damage	3					
IV - Marginal: Minor occupational injury or illness or minor environmental impact	2					
V - Negligible: No injury or measurable environmental impact	1					

Job safety analysis

A commonly used hazard analysis technique is the job safety analysis or JSA. It is a systematic analysis of each task involved in performing a job. It specifies a step-by-step procedure for workers to follow, identifies potential hazards, and outlines how to avoid them. Job safety analysis makes jobs safer so that there are fewer incidents and fewer people getting hurt. Staffing firms can ask clients if they have JSAs for the jobs in which temporary workers will be placed. If they have none, a staffing firm can perform a JSA on the job.

When evaluating each task for hazards consider the following:

- Is there danger of striking or of being struck by an object?
- Is there danger of being caught in, by, or between objects?
- Is there danger of slipping, tripping, or falling?
- Can pushing, pulling, lifting, lowering, bending, carrying, reaching, or twisting cause strain?
- Is there danger of harm to the eyes, hands, feet, or other parts of a worker’s body?

Completed JSAs can be shared with the temporary worker to raise awareness of the hazards present at each step in the task. This system gives workers a frame of reference for reporting hazards and they should be encouraged to complete hazard reports pertaining to their work area and for public workspaces as well.

A client's management should complete an ongoing review of records of injury and illness over time to look for patterns and potential hazards. Particularly if an incident occurs, it's important to investigate and find the who, what, when, where, and why involved. Once they've determined the hazard, they can take action to control or eliminate it. This should also apply to near misses as well.

Here are the steps in performing a job safety analysis:

1. Take inventory of occupations and jobs
2. Select which jobs are to be analyzed
3. Outline each task of the job
4. Divide the tasks into steps
5. Observe each step
6. Identify hazards and assess risk
7. Develop solutions and procedures to eliminate hazards or improve controls
8. Review the job safety analysis
9. Implement the job safety analysis

For more on how to complete a job safety analysis, click [here](#).

Hierarchy of hazard controls

When worker exposure to health or physical hazards is found to pose a risk, a control program must be implemented. The control methods chosen depend on the specific hazard, magnitude of exposure, control effectiveness, and available technology. The diagram below shows the hierarchy of hazard controls with the most effective methods at the top and the least effective at the bottom.

Elimination is the most effective means of hazard control and involves the physical removal of the hazard. A simple example of this could be removing an unnecessary light that creates a glare on an office monitor.

Substitution works by removing something that produces a hazard and replacing it with something that does not produce a hazard. An example of this might be replacing a toxic chemical with one that is eco-friendly. It's important to make sure that the substitution does not create a different hazard.

Engineering controls improve a situation by designing the hazard out of the process. Rather than focusing on protecting the worker, engineering controls concentrate on the job and the work environment to eliminate or reduce exposure to the hazard.

Administrative controls reduce worker exposure by implementing policies, procedures, and rules. Examples of such controls include training, regularly scheduled breaks, and housekeeping. These controls minimize risk.



Personal protective equipment accepts the fact that a hazard exists and protects workers from injury resulting from the hazard. These controls, including respirators, gloves, or safety glasses, do not reduce hazards, but provide a barrier between the worker and the hazard. This last approach should be used only after other controls have been exhausted.

The Safety Standard of Excellence criterion pertaining to a staffing firm's evaluation of a client's assessment and control of risk is:

(4e) Staffing Firm worksite evaluation assesses to the extent of its responsibility the risks inherent in the job assignment prior to worker placement.

To assist staffing firms in contemplating what to evaluate at a client worksite and what put on their worksite evaluation forms, the following categories can be used:

Physical Work Environment (note condition of the following):

- Exits marked and clear of obstacles
- Stairways clear
- Evacuation maps posted in multiple areas
- First aid stations/kits, body/eyewash stations operational and stocked
- Fire extinguishers accessible and tested
- Emergency phone numbers posted including fire, rescue, and police
- Emergency response procedures are in place by host employer
- Availability of SDS's
- Noise >85dB (requires hearing protection)
- Sanitary eating area away from production
- Lighting
- Ventilation
- Temperature extremes
- Housekeeping
- Uneven walking surfaces
- Elevated platforms
- Overall facility conditions

Machinery, Tools & Equipment, Motorized Vehicles (will worker use/perform any of the following):

- Ladders
- Powered industrial trucks (forklift, reach truck, scissor lift, order picker, riding mower, etc.)
- Heavy machinery (cranes, bulldozer, scraper, haul truck, dump truck, excavator, grader, etc.)
- Cement/asphalt machinery (pavers, screed rollers, transit mixers, etc.)

- If driving, what vehicle (tractor-trailer, flatbed, cargo, pickup truck, sedan, etc.)
- Hand tools (utility knife, hammer, wrench, screwdriver, pliers, etc.)
- Power tools (hand grinder, circular saw, drill, nail gun, abrasive wheel, chop saw, etc.)
- Machinery (computer numerical control machine, lathe, milling, forge, extruder, brake press, planer, power press, band saw, roll former, etc.)
- Air compressor tools (jackhammer, pressure washer, etc.)
- Welding (oxyacetylene, arc/stick/SMAW, mig/tig, plasma, friction)
- Painting (electrostatic, powder coating, spray gun, spray booth, spray can)
- Operational (overhead crane, conveyor, robotics, dip tanks, electroplating)
- Clerical (computer, 10-key, copy machine, paper shear, auto folder, auto letter opener, blueprint machine, express mail tabber, etc.)
- PPE required (note which ones, who pays for it, and whether Client trains on proper use/maintenance/storage):
 - Head
 - Eyes/face
 - Clothing
 - Hands
 - Feet
 - Hearing
 - Respiratory

Tasks, Activities, Work Situations (consider which your firm will allow):

- Supervision – how often, who
- Shift work, scheduling
- Work at heights (>4 ft. including ladders, scaffolding, roofs, scissor lift, platforms) or below grade (>3 ft.)
- Work in a confined space
- Asbestos, lead, silica exposure
- Exposure to chemicals (notes which ones)
- Lifting (note avg. and max. weight, rate, frequency)
- Assembly, sorting, packing
- Dock work
- Data entry
- Cleaning
- Driving
 - Electrical work (including work on energized equipment)
 - Maintenance, cleaning, setup of machinery/tools
 - Work on pressurized equipment/lines
 - Changing forklift batteries or propane tanks

- Securing cargo
- Digging, trenching, excavation
- Sandblasting
- Use of explosives
- Flagging/signaling
- Cement/asphalt work (flat work, tilt-up work, form work, precast, etc.)
- Fracking operations

Staffing agencies that strive to continue reducing risk to the lowest possible levels will outperform staffing agencies that do not. Successful risk reduction requires a culture where every worker takes ownership of hazards and an active interest in preventing incident and injury. It also requires a successful safety management system that provides the foundation for effective communication and correction. For more on hazard recognition and control, click [here](#) (login to the SSE portal to view).

Management Commitment to Safety

Just as a corporate culture includes and affects all workers – from top management to the front line workers – so does a safety culture. Consider what an organization would look like if only top executives or only line workers practiced safe habits in the workplace. You would see inconsistencies in process, gaps in buy-in and more incidents and injuries. A safety culture can only grow when everyone in the company embraces safety as a key component in their everyday work. Regardless of shifts in personnel, equipment, products or procedures, when safety is embedded in the company culture, it has the following benefits:

- Improved morale
- Lower turnover
- Improved quality of work and efficiency
- Improved productivity
- Reduced absences
- Reduction in frequency and severity of work-related injuries and illnesses
- Reduced costs
- Reduced workers' compensation claims
- Reduced risk of fines and lawsuits
- Increased profitability
- Favorable company image

The first step on the *Journey to Safety Excellence* calls for personal commitment to safety—not only commitment to safety as a value, but commitment to the management factors that integrate this value into the culture. The Journey begins with leadership. The CEO or president sets the tone for the safety culture.

This tone will frame the level of importance of safety within the client companies at which staffing firms place workers. Leaders must foster a culture where safety is fully integrated in the business and is a core value

where all workers are engaged and share responsibility for each other's well-being. They must demonstrate a strong, genuine, continuous, and personal commitment to safety.

Staffing firms that are more adept at gauging a client company's management commitment to safety will be better at securing the safety of their temporary workforce. Below are some clues that a client has a commitment to safety leadership:

1. They have a safety vision: Cultural change requires effort and persistence, and is best embraced when leaders and workers view the change as essential to the organization's success. Organizations assess the impact the cultural change will have, explain it in a way everyone can understand, and involve workers and managers alike in the execution.
2. A core team exists: Including workers on a core team responsible for leading the change effort goes a long way toward successful execution. The team is responsible for communicating the need for change, anticipating reactions and addressing concerns, designing and executing the change, monitoring results, and publicizing successes. If a client involves their own workers to this degree, they care about safety.
3. The vision and key values are communicated and supported: The safety culture vision is achieved when all workers—including temporary workers—demonstrate that they embrace safety in their daily work. In Robert W. Campbell's words, workers should believe that safety is "the right way to do things." Workers need to also observe that management believes it, to support the change.
4. They communicate what is changing and why: Workers need to know the importance of changes being requested. The urgency to change should be tied to important business goals and successes.
5. Leaders and managers receive feedback on their leadership: Companies with a thirst for safety improvement never settle for "good enough". They set regular meetings to review processes and find ways to continuously improve. They ask workers how management is living the company vision and key values.

While it can be trickier to decipher client commitment to safety and management leadership with regard to the safety and health of workers, it most definitely is worth trying to assess. One thing is sure: A company won't get better at safety if management doesn't support it or is too focused on production or quality to the exclusion of doing those things safely. It's best if a staffing firm knows what their workers are walking into.

With regard to the Safety Standard of Excellence assessment, the following criterion pertains to a staffing firm's ability to decipher a client's commitment to safety at the highest leadership levels:

(4f) Staffing Firm worksite evaluation gauges Client's management commitment to safety to the extent of Staffing Firm responsibility.

Worker Involvement in Safety

In conjunction with effective safety leadership, worker engagement is the other key component of the first pillar in the *Journey to Safety Excellence*. Without active participation by all members of an organization, a safety culture will not evolve and the safety management system cannot reach its full potential. Staffing firms should do their part to understand the extent to which employees – whether the client's own employees or temporary or contract employees—are involved in safety. The benefits of active worker participation are:

- Workers who do the work know the most about the risks involved and how to make the work safer
- Workers feel valued when their ideas and suggestions are requested and taken seriously
- Workers will support and use processes, policies, and programs because they have been involved in forming them
- Workers have a personal interest in recognizing hazards and reporting them

Barriers can prevent organizations from realizing the full potential of meaningful worker involvement. If workers resist participating in the safety process, the following common barriers may be present:

Attitude: The attitude of an organization, from top to bottom affects the success of a safety management system. It's important to acknowledge that workers will resist change unless that change is framed with a positive outcome for them as individuals. These are specific attitudinal obstacles and misconceptions to address for both leaders and workers:

- Lack of trust
- A climate of fear
- The uncertainty of constant change
- Treating change like a program instead of a process
- A history not conducive to worker involvement
- Leaders who won't let go of control
- Workers who focus on their coworkers' imperfections
- Amount of time and effort involved

Roles and responsibilities: Roles must be established, communicated and upheld to have a successful safety management system. It's important to involve individuals in the planning process as well as execution to ensure buy-in and organization-wide approval. Resistance to a client's safety system can result from:

- Lack of demonstrated commitment from top leadership
- Lack of responsibility from top management
- Not involving all the key stakeholders
- Not involving the unions (forming a partnership)
- Resistance from any of the partners (supervisors, managers, support people, unions, or labor force)
- Failure to redefine the role of leadership

Training: When making changes to a system or rolling out a new system, organizations need ample time to train a core team of experts and then additional time for people to change old habits, ask questions, and make adjustments. The success of a client's safety management system can be challenged by:

- Inadequate training
- Team members being assigned or assuming too much responsibility

- Inadequate time for training to take root, leading to worker frustration and fear of getting it wrong

Infrastructure: It's important to build the right environment for a safety management system. It's not something that can happen overnight and will not be adopted homogeneously across an organization. It takes time and constant communication. Systems that fail often encounter these problems:

- Systems and structures not designed to support teams
- Too little or too much structure
- Failure to communicate what's happening
- Not allowing enough time to change
- No transition plan when changes are needed
- Lack of positive attention given to even the smallest improvements

Regardless of title, level or position, or who provides their paycheck, every worker should be encouraged to take ownership of their safety as well as the shared responsibility of the safety of others. Host employers that have outstanding safety performance use these activities to engage their organization in safety on a regular basis.

Suggestion box: With minimal effort, creating an anonymous space for workers to request change will help give them a voice and will relieve them of any whistleblower fears in speaking up. Organizations could also have an online form that accomplishes this task, especially if there are a number of offices or remote workers.

Forums: Bringing together workers from different departments and/or locations (including temporary or contract employees) to discuss safety topics will give all workers a fresh perspective on their workplace while also creating a stronger sense of community across the organization.

Committees: Safety committees improve workplaces and empower workers to serve on a committee that interests them. These can include work groups focused on topics such as ergonomics, off-the-job safety, wellness, and orientation/training.

Surveys: To gauge where workers stand on an issue, companies can easily implement a short multiple choice survey to benchmark worker perception. These surveys can include a brief comment area to capture any related thoughts that are not part of the survey. By taking the time to administer a survey and then sharing the results shortly after, workers will feel that their input is valued. The next step is an action plan based on findings.

Stand down: A stand down is a shutdown of work, taking place after a major incident occurs with the goal of assessing the situation companywide. But even before an incident occurs, an organization can adopt this practice to demonstrate how seriously they take safety, to teach workers how to address hazards and incidents and also to start a dialogue with workers about safety. A stand down normally involves a planned stoppage of work for two to three hours to dedicate this time to safety education.

Safety drills: While drills are a key element in compliance, they also demonstrate how important it is for workers to work as a team and how 100% participation is absolutely necessary in an emergency and a safety management system. Host employers should perform safety drills on a periodic basis and involve temporary workers in such drills (such information should also be covered in safety orientation).

Hazard and incident reporting: Smart leaders know it's best to set up a reporting culture, making it the job of all workers to actively seek out hazards in the workplace. By collecting data into one dynamic database, organizations are able to take action quickly and efficiently to correct the issue or potential issue.

Safety talks: At weekly or monthly meetings, many employers begin with a short safety talk to discuss timely safety concerns such as winter driving tips or summer skin protection. They can come up with creative topics or even reiterate important reminders about off-the-job safety such as cooking safety, child restraint in cars, or prescription drug safety.

Safety projects: Many companies engage workers in safety activities that can benefit the organization and their communities. They encourage workers to come up with something personally significant to them. For example, the distribution of hand sanitizer with a handout about proper food handling and tips on limiting the spread of germs may work in restaurants. Another idea could be setting up a team to check the tire pressure of workers' vehicles. They share the projects throughout the organization and celebrate employee involvement and caring.

Developing and implementing a strong and successful safety culture has many benefits. If it is properly implemented it can combat potential safety hazards regardless of changes in personnel (i.e., infusion of temporary help), equipment, products, and procedures. Some of the benefits include:

- Improved productivity, quality of work, efficiency, and worker morale
- Reduced frequency and severity of work-related incidents, costs related to absences, workers' compensation claims, fines, and lawsuits
- Lowered worker turnover

Successful safety leaders can support a continuously improving, effective safety culture by ensuring that workers understand what safety behaviors are expected of them. This starts with leadership commitment to safety that reflects their beliefs, attitudes, values, and principles about safety. These principles should be in the form of organization-wide policies and practices. Leadership should share the accountability and success of the program by getting workers involved in improving and maintaining the safety culture.

Staffing firms that are adept at sniffing out a client's worker involvement activities will have a better sense of the commitment to safety, leading to more informed decisions about whether to place workers there or not, whether to make concessions, and so on. The Safety Standard of Excellence criterion related to a staffing firm's ability to do this is:

(4g) Staffing Firm gauges Client's worker involvement in safety, including temporary workers.

Frequency of Worksite Evaluation

So far, we've reviewed what staffing firms should evaluate while contemplating new client relationships and while performing an onsite walkthrough. But in what situations should worksite evaluations be performed? Ideally, client and worksite evaluations should occur before placing workers onsite. In the case where work for a client is sporadic, it may be tempting to assume that prior worksite evaluations could suffice. But what if they have new operations? New processes? Work with new chemicals? At the very least, questions should be asked that get at "what's changed?" It is recommended that if a previous worksite evaluation is a year old or more, the site be visited again before placing workers there. Also, if there are different jobs or areas of the

physical location where workers will be placed that have not been viewed, it is recommended that an onsite visit take place as well. Also, it is reiterated that as in criterion 4a, that qualified personnel perform the safety evaluations whether they be initial or periodic, and preferably such evaluations are conducted in concert with safety personnel at the host location.

It is also important that the process for conducting evaluations, the evaluation form, and frequency of onsite visits be detailed in the staffing firm's Injury and Illness Prevention Plan (IIPP). Including such language in the plan helps protect against an OSHA citation. IIPP violation citations are very common so it is best to include a process that is feasible and able to be tracked.

The criterion that relates to frequency of worksite evaluations is:

(4h) All safety evaluations of host employer worksites are conducted by qualified personnel; worksites are revisited periodically and documentation updated.

Communication of Hazards to Client

Once worksite evaluations are completed, you've reviewed the host employer's safety performance and programs and determined you'd like to proceed with placement of workers, the next step is to communicate to the client any issues uncovered during your analysis for remediation. While safety performance may not be ideal, if worksite evaluations show that solid programs are in place to identify and mitigate hazards, you may decide to proceed regardless. However, if obvious safety programs are missing (e.g., PPE not provided nor enforced for any worker exposed to hazards requiring PPE or lack of ergonomics program or taskforce despite high repetitive motion or overexertion injury rates), you may want to think twice about placement until such programs are implemented. In these scenarios, you'd want to insist that to place your workers, these programs be in place and you'd want some type of confirmation (visual, preferably), that things have changed from when you first noted it onsite.

If the issues you find have more to do with a missing guard or incomplete training, you may be tempted to think that these are easier fixes for a client to implement and you might be right. But you should use caution when you find that workers are finding ways to bypass safety features of equipment or not use PPE because of "comfort" or other similar reasons. These hazards represent a lack of management oversight and/or willingness to support safety fully and should be discussed with the client openly and honestly. It is your willingness to discuss these issues with the client that will ultimately protect your staffing firm's workers and maintain your firm's good safety record.

Finally, if items are noted and communicated to the client for remediation or implementation, your firm should have a way to monitor whether the client actually follows through. This can be via email, phone conversation, or withholding placement until such fixes take place. In addition, your worksite evaluation form or other such notation should be made that indicates: a) there are safety issues (and details on what they are), b) that your firm communicated such issues to the client, c) the client's agreement to fix/alter/add whatever was an issue, and d) dates such fixes were verified or noted. If placement was withheld until fixes were made, this should be noted as well, as it provides documentation that your staffing firm is actually using the worksite evaluation information to make business decisions on whether, and under what circumstances, to place workers.

The criterion related to communication of safety issues to client companies is:

(4i) Results of the Client and worksite evaluation identify, review, and document potential safety and health hazards, safety program gaps, and safety performance issues; if Staffing Firm places workers, such hazards are communicated to the Client; Client mitigation of noted hazards are monitored by Staffing Firm (training to be provided, protections offered, etc.).

Impact on Business Decision

There may be, on occasion, client companies that have such poor safety records, culture, programs, management, cooperation, etc. that your firm questions placement (or continued placement) of workers there. If your firm has been in business for some time, there has likely been an occasion where you've said "no" to a client. This is a true hallmark of a staffing firm's commitment to safety. Obviously, a "no" doesn't come without due diligence to get to a "yes". But in the event a client just isn't willing to change or improve safety, it is in your firm's best interest to walk away. Remember, companies that want to outsource work to staffing firms may very well be looking to shift risk (and associated skyrocketed WC costs) to your firm. Lack of safety may have caught up with the client in the form of unaffordable insurance premiums, frequent visits from OSHA, or other concerns. Your firm must have the ability to sniff out such clients and have the business processes in place and authority given to specific individuals to kill such deals. While in some firms this may set up safety to be perceived as a "business killer", management of firms have an obligation to educate everyone that doing business with a client that has poor safety will end up costing much more than any lost business. Higher frequency and severity of claims affect experience modification rates for 3 or more years. That means higher WC costs for years to come. With WC being one of the single largest expenses a firm has, this decision should not be handled lightly.

In some cases, your firm's decision may not be to turn away a client completely. Your firm may say that certain jobs, departments, or locations are not suitable for worker placement. Staffing firms often have "do not place" lists of specific WC class codes, job types, or locations that are just too risky for worker placement. Such lists show that a staffing firm (or their insurer) has weighed and measured the risks and made the decision (financial or otherwise) to not place workers there.

The criterion that relates to a staffing firm's client evaluation impacting business decisions is:

(4j) Client evaluations impact placement of workers at locations with poor safety culture/performance and/or Staffing Firm business decision to contract with Client.

Tracking Temporary Worker Safety Incidents

Despite all the work a staffing firm does up front to evaluate a client's safety, safety incidents still happen. While the next section details what a staffing firm's and host employer's responsibilities are when incidents happen, in order to evaluate client safety performance on an ongoing basis, your firm should track incidents by client and location. The client is responsible for putting the incident on their OSHA 300 log if they are responsible for the day-to-day supervision of the placed worker. But your firm needs data to track client safety performance. A database can be helpful in this case and it's most helpful to look at incident rates (frequency rates, severity rates, lost time work rates, etc.). Rates equalize the safety numbers based on the number of hours worked at each client and each location.

Periodic review of incident rates should help identify clients that may not be managing risks well or particular locations that have worse performance than others. This kind of intelligence helps your firm manage its overall risk and focus its safety efforts on problem areas. Perhaps it means placing these clients or locations on a more frequent onsite follow-up schedule. Or maybe it factors into price discussions or even business decisions on whether to continue placement of workers. Regardless, if your firm isn't tracking incidents, you're missing critical intelligence that can help you manage your risk more effectively. The SSE criterion relating to tracking temporary worker safety incidents is:

(4k) Staffing Firm tracks incidents at each Client and location where workers are placed and reviews data to make action plans where needed.

Incident Management

You've heard it said that the time to figure out what to do in an emergency should be planned in advance. The same is true with response to safety incidents. Staffing firms and host employers may have different approaches to handling safety incidents including reporting and the resulting investigation, corrective action, and return to work process. These things should be discussed, communicated, and agreed to upon placement of workers at the client site, if not before. Likewise, such protocols should be revisited and tweaked periodically, specifically if a client isn't holding up their end of the agreement. In the event both parties have injury protocols in place and there is disagreement, it may be wise to document whose protocols will be followed. Again, the idea is to aid the injured worker first, then report and record it appropriately. The first incident management criterion related to injury protocols is:

(5a) Injury protocols that delineate Staffing Firm and Client responsibilities in the event of a work-related injury to the temporary worker are in place.

Injury Reporting

There are three parts to injury reporting with which a staffing firm must deal. The first is the temporary worker or client's ability to report to the staffing firm that an injury has occurred. The second, involving all recordable incidents including fatalities, is recording the incident on an OSHA 300 log. The third, involving serious injuries, is the reporting of the incident to OSHA if it involves amputation, loss of an eye, or hospitalization.

The worker must understand how, when, and to whom they should report injuries. Increased report lag time has been shown to increase WC costs exponentially so timely reporting of injuries is key to managing claim costs and ensuring proper treatment of the injured worker. To aid in the speed and ease of initial reporting of the injury or illness of a temporary worker, staffing firms should provide both clients and workers instructions for reporting injuries and illnesses, preferably in writing or available on the firm's website. Instructions should include telephone numbers (800#s), hours of operation of manned phone numbers, and instructions for reporting injuries or illnesses that occur outside office hours (for workers on night or swing shifts or those in different time zones, if appropriate). Managing a worker injury or illness from the beginning is critical for managing the cost of a potential claim so staffing firms that make reporting an injury easy and timely will fare best.

The OSHA injury and illness recording and reporting regulation states that if an employer obtains workers from a temporary help service, worker leasing service, or personnel supply service, that the host employer is obligated to record any recordable injuries and illnesses if it supervises these workers on a day-to-day basis.

Therefore, where the host employer has full supervisory control over workers, the host employer is responsible for injury and illness recording and reporting. Where only the temporary staffing agency exercises day-to-day supervision over workers, the temporary staffing agency is responsible for injury and illness recording.

Where the temporary staffing agency and host employer share the supervisory role, it is not readily apparent which employer must comply. In that case, OSHA advises that the two employers reach an agreement regarding the responsibilities in question (more on shared responsibility [here](#)). However, only one employer's log should contain a record of injuries and illnesses of the workers. These things should ideally be spelled out either contractually or in a staffing firm's terms and agreements. To read the entire OSHA regulation, click [here](#) (login to the SSE portal to view). To view American Staffing Association's webinar on the OSHA recordkeeping, click [here](#) (login to the SSE portal is required).

The final reporting consideration is reporting fatalities and serious injuries (those involving amputation, loss of an eye, or hospitalization) to OSHA. As with recording the injury, the entity supervising the temporary worker is responsible for reporting fatalities directly to OSHA within 8 hours and serious injuries within 24 hours. **Instructions for reporting** can be found [here](#).

The SSE best practice related to reporting is:

(5g) Staffing Firm has after hours on call if working associates after hours.

Triaging Injured Workers

It was stated earlier that the most important consideration in the event of a temporary worker injury is assisting the worker and getting them proper treatment. It can also be said that taking control of the injury claim process from the earliest possible point can control the eventual cost of that claim. Therefore, one best practice to aid in this is a staffing firm's ability to triage injured workers and ensure proper and timely treatment of an injury or illness. This can be accommodated either through use of an occupational nurse hotline or by the staffing firm itself if a qualified medical professional is overseeing such decision-making (via an in-house nurse or a contract locally with a medical facility). Thus, the best practice is:

(5f) Staffing Firm has method for triaging injured temporary workers either by use of an occupational nurse hotline or handled internally if the Staffing Firm has their own in-house nurse or contract locally.

If an injury or illness requires a visit to a medical facility, it is best practice to have a staffing firm representative meet the injured worker there upon first being seen by a physician. At this point in the process, staffing firms can be sure the treating physician is aware of the job the temporary worker is currently placed in, and discuss any job restrictions with the physician. In addition, the staffing firm representative can advocate for generic prescriptions if medications are ordered. Also, in the likelihood that a physician orders opioid medications for pain management, it would be good to understand the CDC dosing guidelines and help ward against the epidemic of opioid abuse. More can be found about this subject [here](#) (must be logged into the SSE Portal to view). The SSE best practice criterion related to this is:

(5h) Staffing Firm representative meets injured worker at medical facility upon initial injury first visit.

Directing Care

To control claim costs due to temporary worker injuries, where permitted to do so, it is a good idea for staffing firms to have lists of approved physicians and medical facilities to which the injured worker might be directed. Having such an approved list allows staffing firms to provide job descriptions and treatment communication protocols. This ensures the staffing firm can return a worker to full duty as soon as possible and stay on top of ongoing treatments, whether workers are showing up for appointments, etc. Some states' WC regulations do not permit directing care so be sure you understand your specific scenario before proceeding. The best practice criterion related to directing care is:

(5b) Where permitted under state WC regulations, medical facilities have been designated and physicians approved by Client and Staffing Firm; Staffing Firm has them on file.

Incident Investigation

Even after conducting worksite evaluations, identifying hazards, communicating them to clients, and periodically following up to ensure safe operations are maintained, incidents can still occur. The first step is to investigate what went wrong within the client's safety management system. You will uncover the cause or causes of the hazard and then be able to determine a recommendation to the client to correct it. While this may sound reactive, the corrective action taken as a result of the investigation is proactive – attempting to prevent a repeat of a similar incident. It's important to note that even if a temporary worker is involved in an incident, the cause lies with the system, not the individual. Blaming should never be a part of the investigation process and can often end up hurting the quality of an investigation in the long run, making it less effective at preventing future incidents.

Good companies investigate *all* incidents. Even though near miss or close call incidents do not result in injury or damage, they should be heeded as a warning sign or symptom of an underlying safety issue. If corrective action is not taken, the incident can occur again and may result in a serious injury or fatality.

There are basic steps to investigating an incident. Some of these may require the client's cooperation such as providing emergency response, securing the area, or saving evidence. It may take some time for a staffing firm representative to arrive at the client's worksite to conduct their own investigation. However, it is imperative that regardless of the client's investigation, that your firm conduct their own. This ensures consistency in information your staffing firm collects for all incidents that will feed the broader analysis. More information can be found on incident investigation and root cause analysis [here](#) (login to the SSE portal to view). Once the staffing firm has ensured the worker has been provided care, here are the steps of the investigation process to carry out:

1. As much as possible, ask the customer to secure the area where the injury occurred and preserve the work area as it is (especially for serious incidents).
2. Locate and take with you to the customer worksite your investigation kit.
3. Visit the customer site to conduct the investigation with the host employer; obtain a copy of the customer's investigation report as well, if one has been completed.
4. Identify and gather witnesses to the injury event.
5. Interview the involved worker.

6. Interview all witnesses or get statements from the customer taken from the witnesses.
7. Document the scene of the injury through photos or videos if your customer permits.
8. Complete the investigation report, including determination of what caused the incident and what corrective actions your customer will take to prevent recurrences.
9. Ensure follow up with your customer and temporary workers on assignment about completion of corrective actions.

Sometimes, even after an investigation, the cause(s) of the incident are not clear. You can get a more in-depth look by analyzing four key elements – equipment, environment, people, and management. Ordinarily, these four elements work in harmony to produce products or services. But sometimes they work together in unexpected ways to produce incidents.

Ask a series of questions regarding each element to assist in the examination:

- Did a hazardous condition with the equipment contribute?
- Was the location/position of equipment/materials/workers a contributing factor?
- Was the job procedure a contributing factor?
- Was lack of personal protective equipment or emergency equipment a contributing factor in the injury?
- Was a management system defect a contributing factor?

Once you get to the cause(s), you can begin to identify the appropriate corrections to prevent a similar incident and suggest those to the client. A client should select corrective actions with the best chance of reducing risk. They will need to consider factors such as effectiveness, cost, feasibility, effect on productivity, time required to implement, extent of supervision required, acceptance by workers, and acceptance by management. Corrective actions that best address these factors are more likely to reduce worksite risks. A basic incident investigation report template can be found in the SSE portal [here](#) (login to view the template).

The SSE best practice is to conduct an investigation of all safety incidents requiring involvement of a nurse or treatment beyond first aid. The criterion is:

(5d) For each injury requiring involvement of a nurse/treatment beyond first aid, an incident investigation is conducted.

It's not always possible to have safety professionals conduct incident investigations. However, it is a good idea for staffing firms to put in place a method for examining the quality of investigations conducted by field staff including completeness of information, accuracy, depth of analysis of root causes, and appropriateness of suggested corrective actions. It is also recommended that a staffing firm provide some basic training to field staff on how to conduct an investigation if they will be required to do so. Having a structured form for all investigations will help, but some instruction normally will be required before the average person can do a good incident investigation. There are some helpful hints for identifying causal factors and corrective actions [here](#) (login to the SSE portal to view). The SSE best practice criterion related to quality of investigations is:

(5e) Staffing Firm has a method for addressing the quality of incident investigations, root cause analysis, and corrective actions.

Injury Tracking and Claims Management

As was stated earlier, it is the responsibility of the entity providing the day-to-day supervision of the temporary worker to record the injury on its OSHA 300 log and report any serious injuries to OSHA. However, in the case where the host employer does this, it is imperative that a staffing firm also track injuries sustained by its workers so it can perform its own analysis. Many times, this information is kept to some degree by the claims administrator (insurer) or accessible to the insurance broker. However, not all information pertinent to a staffing firm's interest may be included in such reports. Therefore, a staffing firm should keep track of all injuries and illnesses sustained by its temporary workforce.

Incident records showing causes, related injuries, illness, and property damage help staffing firms learn how to control and prevent hazards that can cause incidents or form more comprehensive "do not place" lists.

The reports required by law – and commensurate penalties for failing to comply – are governed by the Occupational Safety and Health Administration. Again, the entity supervising the temporary workers have these responsibilities:

- **OSHA 300 log of work-related injuries and illnesses:** This log is used to classify work-related injuries and illnesses and note the extent and severity of each case
- **OSHA 301 injury and illness incident report:** This form must be completed for each injury or illness that is in the 300 log
- **OSHA 300-A summary of work-related injuries and illnesses:** This is a separate form that categorizes the total number of incidents each year by type and is posted annually from February 1 to April 30

Accurate recordkeeping will not only keep your staffing firm in compliance, it will also enable the pinpointing of hazards, reduction of risk, and prevention of future incidents. While many staffing agencies still use paper or static databases such as excel reports to track incidents, it's best to record and manage records in a dynamic and actionable database.

Ideally, workers will have access to the system (or a web or mobile form that feeds the system) with the ability to submit incident reports right after they occur. This enables staffing firm management to communicate, investigate and take action immediately, expediting the correction and prevention of further injuries.

The SSE best practice criterion related to injury tracking is:

(5c) Staffing Firm tracks injuries sustained by its temporary workers at Client sites for its own analysis.

Return to Work

The goal when any temporary worker gets injured is to return them to full work duty as soon as possible. However, recovery from an injury may take some time and workers may be capable of performing some duties of their assigned job but not others. They may also be able to perform a different job if the one they had been doing when the injury occurred is not possible.

In order to place a worker on a modified duty assignment and bring them back to work in a limited capacity, a staffing firm must have a documented return-to-work program. Objectives of the program should be outlined, conditions under which the program will be applicable should be listed, and procedures for determining level of disability should be delineated.

In addition, before modified duty is offered, the staffing firm should require the injured or ill worker (or their designee) to provide a written medical diagnosis from the treating healthcare provider. Upon determination that modified duty is a viable alternative to the worker, the staffing firm should then obtain—if it has not already—a signed offer of modified duty from the injured worker and train them for the modified duty assignment.

Workers undergoing treatment or following up with the treating physician should provide a work status report to the supervisor of the modified duty work. Additionally, the modified duty assignment should be periodically reviewed by the staffing firm to determine whether the worker is fulfilling the duties of the assignment within any work restrictions, and whether the assignment is continuing to be an ideal fit with the goals of the RTW program.

The Safety Standard of Excellence criteria related to return-to-work are:

(5i) Staffing Firm has a RTW program.

(5k) Staffing Firm analyzes their RTW program to review effectiveness and look for improvement opportunities.

Modified Duty

Some organizations find return-to-work examinations helpful for any worker that has been absent for more than a specified number of days as a result of an illness or injury. This type of examination is done to determine whether the health status of the worker may require a change in duties or to ensure proper placement, preventing re-injury, and lengthening overall recovery time.

Return-to-work examinations also serve to evaluate workers after a severe injury or illness. Research has shown that the longer workers are away from their jobs, the less likely they are to return fully to productive employment. Some injuries may require workers to have light duty, limited duty, or other work restrictions placed on them. This should be determined by an occupational health professional after a thorough examination of the recovering worker.

Light duty is an adaptation of the worker's original job to reduce the worker's tasks. *Limited duty* is defined as a new job that is appropriate to an injured worker's skills, interest, and capabilities. It is designed for people who cannot return to their original work area and is created for either temporary or permanent placement, depending on the permanence of the injury or illness symptoms.

Another option to rehabilitate workers is known as *work hardening*. This is a progressive, individualized physical conditioning and training program designed to help injured workers return to the workplace as soon as possible. It involves gradually increasing physical and psychological requirements of the job, within the worker's current capabilities, until they can perform once again at acceptable work levels.

No matter what assessment for return to work is completed, staffing firms must be sure to match returning workers with appropriate job demands, work conditions, and level of duties performed. The use of a client's job descriptions, job analyses, and discussions with workers' supervisors can prove helpful in this determination.

Staffing firms should inquire whether the identified work option can be accommodated within the client's operations. If it cannot, a staffing firm can opt to accommodate the worker within a staffing firm's operations, non-profit organization, or other organization looking for help.

The criterion related to modified duty is:

(5j) Staffing Firm has in place signature documentation of acceptance/rejection of offer for a modified duty assignment.

Verification of Client Responsibilities for Incident Management

Because incident management requires collaboration and cooperation between a staffing firm and host employer, there are specific best practices for each. For purposes of the Safety Standard of Excellence program, the focus is on what the staffing firm has control over within this process. That said, there are a few practices that are worth exploring in more detail: exchanging injury protocols, staffing firm measurement of injury/illness report timeliness (because this affects ability to return a worker to full duty and resulting WC costs), and staffing firm documentation of client willingness and ability to assist in incident management and future incident prevention.

Injury Protocols

It is a best practice for a staffing firm and host employer to exchange injury protocols, ideally before placement of workers. This is covered in the previous section but is worth reiterating here as it is critical that a coordinated effort is made on behalf of the injured worker. Exchanging the following information and deciding for each client whose process (or which parts of each party's process) will be followed can help a staffing firm manage the eventual WC costs associated with safety incidents:

- How temporary worker injuries/illnesses get reported to the staffing firm (to whom, how, when)
- Agreement as to who is providing the day-to-day supervision for the temporary worker (answers the question about who will record the injury/illness on the OSHA 300 log if recordable and who will report serious injuries to OSHA)
- Method for triaging injured workers (who will handle, how it happens)
- Directing care (medical facilities, approved physicians, job description and physical/mental demands for placed workers' jobs, authorization forms for disclosure of private health information)
- Communication with injured employee (who, when, how often, under what circumstances)
- Incident investigation process (how you'll coordinate investigation, communicate corrective actions, follow up to ensure corrective actions are completed)
- Return to work coordinator contacts, programs, policies, assignment of modified duty, client willingness to accommodate RTW

So for purposes of the Safety Standard of Excellence program, a staffing firm will be measured on the extent to which they've collaborated and agreed upon the above information with clients in their portfolio. To reiterate:

(5a) Injury protocols that delineate Staffing Firm and Client responsibilities in the event of a work-related injury to the temporary worker are in place.

Timeliness of Reporting

Staffing firms and their insurers can't throw their resources into managing a workplace injury until they know about it. A delay in reporting an injury jeopardizes providing the injured worker optimal medical care and facilitating an ideal return-to-work. Research supports a commonly-held belief among workers compensation practitioners that delays in delivering appropriate medical care and applying claims-resolution best practices often drive additional, unnecessary costs. In fact, the cost of claims is lowest for injuries reported to insurers the day after an incident occurs, but within two weeks of the incident. Claims reported to insurers on the same day as an injury occurs, however, experience costs that are 25 percent more than those reported during week one, likely because such injuries are more severe and require immediate medical attention—the types of injuries that require more extensive medical care and rehabilitation.

So what drives the costs of delayed reporting? First, an injured worker may seek help from their primary physician or family medical doctor who may not understand occupational medicine practices such as applying a sports medicine approach to treat musculoskeletal injuries, for example. In contrast, prompt reporting enables claims adjusters and nurse case managers to help a worker obtain treatment from an orthopedic specialist capable of providing the most specialized care possible for their condition. The insurer helps the injured worker navigate the medical system, connecting them with nurse case managers when necessary, and facilitating communication with the treating physician. Also, insurers can explain the benefit process to injured workers and help the staffing firm develop a return-to-work plan.

The risk of recidivism also increases when the injured worker doesn't receive appropriate care the first time. They may return to the job too soon, potentially exacerbating their injury or even reinjuring themselves. Then you're basically repeating the medical care cycle a second time, increasing costs because now you're trying to get the right treatment for the injury. It's not uncommon in these circumstances to have medical expenses double.

Research also shows that as injury report lag time increases, attorney involvement grows, adding to the complexity of resolving a claim and time spent related to managing that claim.

So it starts with a staffing firm receiving notice of the injury who, in turn, notifies their insurer of the injury or illness. This puts into motion a coordinated effort to help the worker receive the proper care the first time around, explore viable return-to-work options, and close the claim in a timely manner. The Safety Standard of Excellence best practice, therefore, is to measure timeliness of injury/illness reporting:

(6a) Staffing Firm measures timeliness of worker injury/illness reporting.

Client Cooperation in Incident Investigation, Implementation of Corrective Action, and Accommodating Return to Work

When incidents occur, the staffing firm definitely wants to be notified immediately for reasons stated in the section above. But after the immediate care has been given to the worker, a thorough investigation of the incident is necessary (see Incident Management section for details on why this is important), corrective actions should be implemented, and, if appropriate, a return-to-work plan should be enacted (which may or may not be accommodated by the client).

To conduct the investigation, clients must be cooperative since you're likely going onsite to one of their locations to do so, will likely need to escort you around, and may even conduct their own investigation simultaneously. Staffing firms should have discussed and outlined this coordinated process in their injury protocols upon contracting with the client. However, in an effort to continue monitoring the health of the client/staffing firm relationship (and thus, their cooperation in providing a safe environment for all workers, including temporary ones), staffing firms should document for each incident the following best practices:

- Ability to conduct investigation at the client site post-incident
- Timeliness of access to client site for investigation purposes
- Client participation/cooperation in staffing firm investigation process
- Client conducting their own investigation independent of staffing firm's
- Client follow up and implementation of staffing firm-derived corrective actions
- Client investigation findings, recommendations, actions taken

Therefore, the best practice related to this for the Safety Standard of Excellence program is:

(6b) Staffing Firm documents:

- Ability to, and timeliness of, conducting an incident investigation at the Client site post-incident
- Whether Client participates/cooperates in Staffing Firm incident investigation process
- Whether Client performs their own incident investigation
- Whether Client follows up and provides requested corrective actions by the Staffing Firm
- Client incident investigation findings/recommendations/actions

In addition to conducting the investigation, when appropriate, a staffing firm may ask the client whether they are able to accommodate return-to-work (RTW) assignments. This may not always be possible, but when it is appropriate to ask, a staffing firm should document whether the client is willing and/or able to accommodate the RTW assignment and their cooperation and adherence to the assignment throughout the duration of the RTW period. The best practice criterion related to this is:

(6c) Staffing Firm documents the Client's capability/willingness to accommodate RTW, adherence to the policy for injured workers, and whether Client accommodates Staffing Firm worker.

Contracts

On April 29, 2013, the Occupational Safety and Health Administration announced an initiative to protect temporary workers. The initiative is marked by both enforcement and education efforts. To help staffing firms and clients clearly specify and delineate their respective workplace safety obligations under the law and applicable regulations, the American Staffing Association developed a version of the general staffing agreement that included highlighted safety-specific clauses. While not necessarily appropriate for every staffing arrangement, the clauses are particularly suited for construction, industrial, and other safety-sensitive sectors of the staffing industry. Although OSHA cannot endorse the clauses, the agency reviewed them and they were developed by ASA based on OSHA's published [recommended practices](#).

These agreements should outline three basic sections with regard to safeguarding temporary workers: client responsibilities, staffing firm responsibilities, and staffing firm rights. Rather than reiterate here what is already contained in the model contract, please reference the document [here](#) (must be logged into the SSE portal to view).

Client Responsibilities

The responsibilities of the client or host employer as outlined in the contract should include:

(7a) Client responsibilities are outlined in contracts according to Staffing Firm legal counsel requirements, Staffing Firm business model, and consideration of ASA Best Practices.

Review contracts for inclusion of language pertaining to:

- Supervision and training of temporary workers in a manner as its own employees.
- Responsibility for its business operations, products, services, and intellectual property.
- Supervision, control, and safeguarding of its premises, processes, or systems.
- Not permitting temporary workers to operate vehicle or mobile equipment, or entrust them with unattended premises, cash, checks, keys, credit cards, merchandise, confidential or trade secret information, negotiable instruments without Staffing Firm's prior written approval or required by job description.
- Provide safe worksite and working conditions that comply with the OSH Act of 1970 (and all that implies), and state and local laws and regulations.
- Not change Temporary workers' job duties or worksite without Staffing Firm's prior written approval.

Staffing Firm Responsibilities

The staffing firm responsibilities for temporary worker safety as outlined in the contract include inquiring about the working conditions to which assigned workers will be exposed at the client worksite, provision of general safety training in a language the worker understands, and confirming the client has provided site-specific training and safety and personal protective equipment required by the OSH Act of 1970, state and local laws and regulations, and work rules of the client. The best practice criterion related to staffing firm contractual responsibilities is:

(7b) Staffing Firm responsibilities are outlined in contracts according to Staffing Firm legal counsel requirements, Staffing Firm business model, and consideration of ASA Best Practices.

Staffing Firm Rights

Contractually, it is always best to also include staffing firm rights as the common law employer to physically inspect the worksite and work processes in order to assess potential worksite hazards to temporary workers, conduct post-incident investigations, and to audit a client's safety and training records. Therefore, the Safety Standard of Excellence best practice criterion is:

(7c) Staffing Firm rights are outlined in contracts according to Staffing Firm legal counsel requirements, Staffing Firm business model, and consideration of ASA Best Practices.

Inclusion of Safety in RFQ Language

When responding to a client's request for quote, proposal, or information, best practices indicate that staffing firms stating upfront their dedication to, and interest in, temporary worker safety will set the tone for the business and collaborative relationship with a client. Like any good relationship, stating the operating assumptions and expectations early and often will go a long way to ensure the right behaviors are set in motion to protect workers. By doing this, it also allows less-than-reputable clients to walk away before engaging further with staffing firms that don't share values. The best practice related to this item is:

(7d) During RFQ/RFP/RFI processes, Staffing Firm includes temporary worker safety position/statement/information to Client.

Nurse Staffing

When it comes to placement of nurses into a temporary work assignment, there are a number of additional best practices that are assessed within the Safety Standard of Excellence criteria related to screening, training, and client evaluation. Most of these items are self-explanatory and we include them here for reference.

Application Phase

(8a) Staffing Firm obtains a complete application for employment from each candidate, as well as the appropriate state-published supplemental questionnaire.

Screening Phase

(8b) Staffing Firm conducts a 10-panel drug screen before nurse is assigned and also within 30 days of assignment and keeps a log of drug tests.

(8c) Staffing Firm confirms that the candidate possesses required licenses or certifications.

(8d) Staffing Firm verifies via Office of Inspector General Exclusion search, that candidate is not excluded from participation in federally funded programs (if applicable).

(8e) Staffing Firm verifies candidate possesses current CPR certification and any other relevant or desirable certifications.

(8f) Upon hire, Staffing Firm verifies that applicant has had:

- A satisfactory medical examination within the previous 12 months
- A tuberculosis test within the past year or chest X-ray within the past 5 years showing negative results
- Hepatitis B vaccination, antibody testing revealing immunity of Hepatitis B, or declination of Hepatitis B vaccination signed by candidate
- Rubella vaccination or titers
- Varicella titers

(8g) Upon hire and periodically thereafter, Staffing Firm verifies candidate has completed mandatory training programs required by the applicable state, OSHA, CDC, industry regulatory bodies, etc. Examples include:

- Universal Precautions
- OSHA

- Substance Abuse
- Health Insurance Portability and Accountability Act (HIPAA)
- Age-Specific Skills
- National Patient Safety Goals

(8h) Staffing Firm administers self-assessments of nurses' clinical competency and skills in specific specialty areas, records such competencies/skills, and updates them annually.

Training

(8i) Staffing Firm provides workers placed in nursing jobs caregiver education and training addressing the leading causes of injury—patient handling, patient assaults, and slips and falls.

Client Evaluation

(8j) Staffing Firm, as part of its risk assessment of the Client, confirms and documents Client accreditation (if applicable) and notes existence of state law and regulations violations.

(8k) Staffing Firm, as part of its evaluation of the Client, documents the review of Client's policies and procedures regarding patient handling and interaction (including combative patients).

(8l) Staffing Firm documents Client provision of site-specific orientation and training including:

- Annual fire and electrical safety classes
- Annual infection control classes
- Annual in-service training regarding recent changes in laws or standards relating to health care, including those pertaining to the ADA, pain assessment and management, bloodborne pathogens and needle stick regulations, cultural, spiritual and age-specific needs of patients, and national patient safety goals
- Orientation that addresses any requirement that licenses and CPR certifications be carried at all times while on duty
- Dress codes
- Documentation and medication administration policies and procedures
- "Code Blue" policies and procedures

A Final Word about Continuous Improvement

The Safety Standard of Excellence program is designed to encourage improvement in safety year-over-year. Assessment scores received one year do not guarantee the same scores in the next evaluation cycle, particularly because the same sites will not be assessed. Likewise, there are stipulations about increasing SSE scores with each successive evaluation cycle in order re-earn use of the program mark (see the [Program Guide](#)).

The following five basic steps will keep safety incorporated throughout your staffing firm daily, year after year. These steps are a cycle that with repetition will result in continuous improvement.

1. Measure: Determine the current state of safety within your organization, repeat measurement determining improvement over baselines and share findings.
2. Determine gaps and set goals: Using the baseline, set and share measurable goals for improvement. Align safety improvement goals with business priorities. Communicate a vision of what the organization could be and how it will strive to achieve the vision.
3. Develop improvement plans: Create a path forward and assign specific goals. Gain leadership support and communicate the plan to the whole organization. Rely on proven practices that increase chances of success.
4. Implement plans: Make the plan happen. Provide training when and where needed. Make sure to acknowledge success when identified gaps are closed and performance improves.
5. Capture lessons learned: Determine which strategies and tactics were successful. Eliminate the unsuccessful ones, enhance or expand the others. Assess your efforts and continue the cycle for incremental, sustainable improvement.

Adopting the mindset of safety never being “good enough” at your staffing firm will spur activities that will continually focus on the betterment of policies, practices, and business decisions that support temporary worker safety. It is this continuous improvement momentum that will set your staffing firm apart from the competition.