



An Initiative of the
American Staffing Association
and National Safety Council

SAMPLE
Safety Standard of Excellence
Assessment Report

for

ABC Workforce

MONTH/DAY/YEAR

Completed by
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National Safety Council



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The American Staffing Association is the voice of the U.S. staffing, recruiting, and workforce solutions industry. ASA and its regional councils and affiliated chapters advance the interests of the industry across all sectors through advocacy, research, education, and the promotion of high standards of legal, ethical, and professional practices.

The nation's leading safety advocate for more than 100 years, the National Safety Council is a nonprofit organization, with the mission to save lives by preventing injuries and deaths at work, in homes and communities, and on the road through leadership, research, education and advocacy. Working to make the world measurably safer, NSC advances this mission by engaging businesses, government agencies, elected officials and the public to help prevent unintentional injuries.

The National Safety Council conducted a Safety Standard of Excellence Assessment of the corporate office (CO) of ABC Workforce in Anywhere, ST and 5 branch offices in OH, KS, FL, CO, and AL. The purpose of this assessment was to evaluate the effectiveness of the organization's current safety and health management system with regard to its temporary workforce. National Safety Council representative, Dr. Amy Harper, performed the assessment on Month XX, YYYY. The process involved a review of current policies, projects and activities, related documents, and staff interviews.

Program Purpose

The Safety Standard of Excellence program (the "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 employees' 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. To that end, the following rules, overview, and procedures govern the program.

- **Program Eligibility**

To be eligible to participate in the Program, the applicant must complete a program application, in which the applicant must provide complete and accurate responses to the requested information and attest that the applicant meets the following criteria:

1. The applicant must be a staffing firm that is open for business and actively placing employees on temporary assignments.
2. The applicant must agree to uphold the ASA Code of Ethics and Good Practices.
3. The applicant must agree to a release and indemnity agreement.



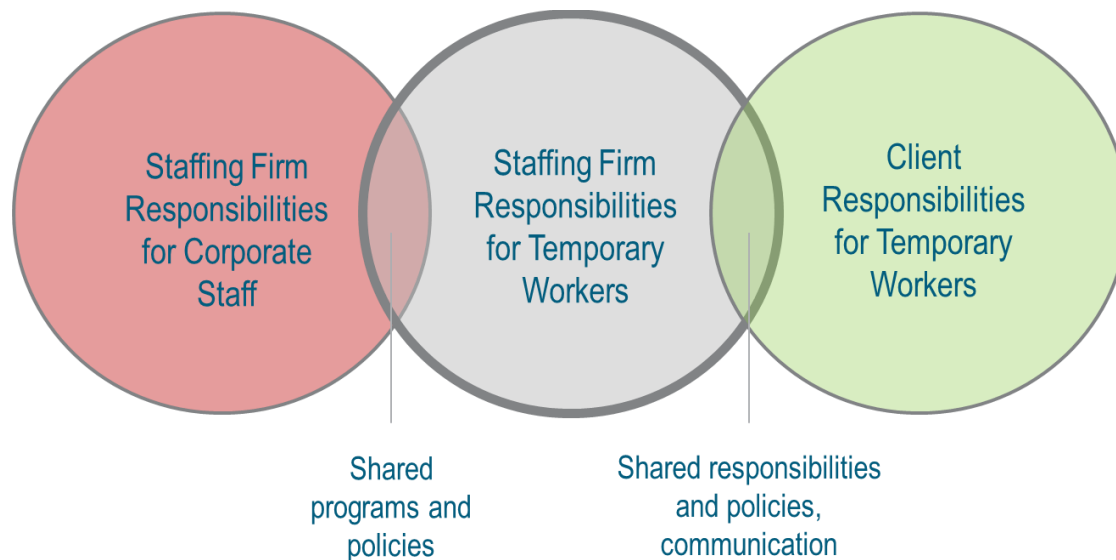
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2. Program Elements

a. Scope and Criteria for Assessment

The scope of the Program is depicted in the graphic that follows. The best practices contained within the Program refer to:

- Staffing firm responsibilities for temporary and contract workers placed on assignment at client locations.
- Staffing firms' ability to evaluate, communicate with, and influence clients with respect to temporary and contract worker safety.



The criteria for the assessment (“Safety Standard of Excellence”) fall within the following sections:

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)



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b. Scoring

The Consultant assessed the criteria using the following values on a 1–3 scale:

1 = little or no evidence exists that this is in place; adhered to sporadically; few best practices as listed are being followed

2 = there is some evidence this is in place; adhered to somewhat consistently; several best practices as listed are being followed

3 = there is strong evidence that this is in place; practiced consistently; most best practices as listed are being followed

A score was generated for each of the sections using an average of all its criterion values (the “Section Scores”). For this assessment, the ABC Workforce Corporate Office in Anywhere, ST, and 5 branch offices of ABC Workforce were evaluated. The assessments resulted in **ABC Workforce earning a score of 2.46**. Since ABC Workforce scored above 2.3, **use of the SSE Program Mark is earned**.

c. Report, Analysis, and Recommended Actions

Section 1—Staffing Firm Responsibilities for Worker Selection

Strengths:

- ABC Workforce conducts a pre-hire 5-panel drug test (marijuana, cocaine, opiates, amphetamines, methamphetamines) onsite in the branches for all workers and tests for additional drugs if clients’ specifications require it. Because ABC operates in states where recreational use of marijuana is legal, it is wise to test for it. In addition, ABC is to be commended for including opiates in the 5-panel because it is such an epidemic in our country. NSC just released a study indicating workers that abuse opioids miss 50% more work days.
- If a worker fails a drug test, they are allowed the option to have the sample tested by an independent lab offsite or they can come back to the branch in 30 days. If the worker indicates that a drug is for medical use, it is forwarded to ABC’s Medical Review Officer for a decision on what potential restrictions might need to be in place to work safely (i.e., no forklift, etc.). In the event of two failed drug tests, workers are “terminated” in the system, meaning they are not eligible for hire.
- Screening and testing data on all workers is available to all other ABC branches so there is no potential for abuse (e.g., worker fails drug test at one branch, goes to next branch 10 miles away and applies there).
- Recognizing the high drug test failure rate in this branch (one interview indicated it was as high as 50% in their state; 95% fail rate in another state), the CO branch took the initiative to create additional candidate phone interview questions to better screen out drug users.
- ABC Workforce uses candidate application data and evaluation techniques to thoroughly screen client candidates and fit workers to an appropriate job. The job hiring process includes a phone interview with the staffing firm, interview by the client, and background check.

Opportunities:

- The CO branch’s (and perhaps other branches in states where particular drugs are legal) high drug test failure rate increases the cost of screening and hiring workers in these branches. While



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they are to be commended for trying to solve the problem with the addition of screening questions beyond corporate policy, it probably best for corporate to review such questions and identify whether they are appropriate (legal) and whether they indeed help with drug test pass rates.

- If ABC Workforce determines that branch modifications to interview questions leads to better drug test pass rates, they should consider adopting the more stringent screening questions nationwide, even in states where the drugs such as marijuana are illegal.
- It appears that in states where legalization of marijuana has occurred, it has made it more challenging to hire good workers. ABC Workforce could consider putting together a special task force or focused effort to aid those branches in reducing screening and hiring costs. Activities of the effort might include enhanced messaging in the branch about employers rights (that just because a drug is legal doesn't mean a company has to hire you if you test positive for it) and development of legal screening questions that may interrupt the candidate screening earlier in the process vs. waiting for the drug test to confirm a candidate's unacceptability.
- In branch assessments, it was determined that checking references did not appear to be occurring consistently. The MI branch indicated that the act of verifying references was dictated by the client and that they wouldn't do that unless the client asked them to. It is a best practice to have at least one verifiable reference from a worker's former supervisor.
- While communication of essential job functions, physical demands, etc. to workers appears to be happening across all branches, the methods used differ by branch, leading to inconsistent filing of such assignment sheets (or not at all). Some (AL) instruct workers to come to the branch to pick up hard copy assignment sheets. Others (OH) email the assignment sheet to the worker and ask for an email response that they received it. The FL branch had assignment details in the system, and other branches did not (or they had an email trail, but it was not in the system; email retention policy might wipe out this communication after a specific amount of time).
- Candidates don't always inform the staffing agency when the job description doesn't match the work at the client site, although the staffing agency does inform the candidates of the requirement to do so.

Recommendations:

- Reinforce to candidates that they should inform the staffing agency when the job description doesn't match the work at the client site. Routine follow-ups at the client sites to verify should continue and documentation should be maintained.

Section 2—Staffing Firm Responsibilities for Worker Training & Orientation

Strengths:

- The KS branch mentioned that they give a color-blind test to workers to screen for positions that would require color recognition.
- Worker electronic files were very complete with nearly all having records of safety orientation training having taken place and scores were readily available on the safety, GHS (SDS), PPE, forklift (if applicable) and ready-for success (soft skills such as who to call if absent) quizzes. All quiz scores have to be 80% or better to continue with placement.



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- ABC provides training on bloodborne pathogens (video plus test, plus add workers onto their BBP program, including training and Hep B vaccination) and powered industrial truck (PIT) (test, 6 months verifiable experience, drug test for safety sensitive position (operating equip) plus annual drug test)). With OSHA's addition to the list of staffing firm responsibilities (see TWI bulletins #7 and #8), to provide general training on Bloodborne Pathogens) ABC Workforce might consider creating or finding a source of training in these areas.

Opportunities:

- ABC might consider creation of training materials in other languages of predominance in the places they serve. There is limited evidence that employees with language challenges (non-English) are accommodated in the assignment process.
- There was limited information available about handling orientation for workers with hearing impairments or those with less than a 6th grade reading level.

Recommendations:

- Ensure that non-English speaking candidates are provided with adequate translations, training material (paper and video) as well as allow for personal translators to participate in the interviews and training sessions if the candidate requests.
- Ensure that orientation program includes procedures for ensuring workers with hearing impairments or those with less than a 6th grade reading level are provided with information in a way that ensure comprehension.

Section 3—Staffing Firm Verification of Client Responsibilities for Worker Training & Orientation

Strengths:

- ABC has a system in place to verify that Client's site-specific safety orientation for all placed workers and 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 program; The OH branch client files included references to training that had been provided to workers.
- Client Agreement form contains language that indicates client will provide workers training, PPE, etc. and that ABC requires prior written approval if workers' duties, equipment, or worksites materially change. Interviews confirm that either clients communicate this to ABC, or ABC contacts the worker shortly after starting the job to confirm that training took place, the job is what they said it would be, etc. The AL ABC branch did this very well and because of frequency of visits to job sites, often did it in person.

Opportunities:

- Most branches' client files did not have any information on whether workers received site-specific orientation or on-the-job training specific to the hazards at the worksite. While the follow-up worksite evaluation form has fields inquiring about client training of workers, follow-up worksite evaluations were not consistently being documented and therefore, the client's provision of training is also not being documented.



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Recommendations:

- Ensure follow-up worksite evaluations are taking place and that client training of workers is being properly documented in the form.

Section 4—Staffing Firm Evaluation of Client Safety Culture, Safety Performance, Worksite and Job

Strengths:

- ABC Workforce's FL branch had a good method for ensuring periodic follow-up worksite evaluations were conducted. There, a list of current clients was generated with dates of original worksite evaluations. From those dates, follow up visits were scheduled annually, listing due dates and who was responsible for conducting them. Another branch indicated that they create a reminder note in the system for "next task". Yet another said that within "Forms and Procedures", you can enter expiration dates and then run a report to pull those dates, giving them a list of upcoming follow up visits due.
- ABC Workforce has a tiered decision-making system for requesting clients' OSHA 300 log information. EMRs are requested up front in the credit application.
- ABC Workforce's client worksite assessment form is sectioned according to increasing hazard levels to aid in completion. If completed appropriately and by a trained evaluator, the form is able to identify hazards present at the worksite, controls in place, and whether PPE is appropriate or required.
- The local safety staff member working with the consultant showed a document/training in development that will greatly assist those responsible for conducting worksite evaluations in their learning about hazard identification, appropriate safeguards, and under what circumstances to use specific PPE. Upon completion, this training could be an industry-best for increasing worksite evaluator competency.
- In all interviews, branch managers were able to recount times they had to say no to a prospective client due to safety concerns.
- ABC Workforce's corporate office tracks injuries by region, branch, and client. This allows ABC to spot and subsequently focus its efforts on priority areas. With only two regional safety staff, the ability to use data to pinpoint problems is extremely vital. One caution: safety personnel should spend their time between incidents that have already occurred and other "fires" in need of putting out and risk identification and reduction. Too much time spent on the former will not improve safety performance as much as a focus on both.
- ABC informs candidates during the interview process that they will visit the client site post-assignment to check client safety or perhaps interview the worker.
- ABC relayed through an interview that there has been one time where a client has been terminated for safety reasons. The client did not follow safety rules to reduce risk of injury by rotating employees through consistent job rotations. As a result, the client relationship was terminated.

Opportunities:

- In the client file reviews, none of the branches were consistently adhering to the corporate policy of documented follow up visits. In a good number of branches, no follow up visit documentation could be found and if it was, it was grossly outdated by several years. ABC



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Workforce is putting itself in the position of having a stated corporate policy on frequency of follow up visits and not adhering to its own policy.

- In interviews with staff responsible for conducting worksite evaluations, it was apparent that more attention could be given to preparing them to identify risks and effective safeguards. When asked what they look for at the worksite evaluation, little more than “OSHA posters” was noted by one respondent who presumably did all evaluations for that office. Other evaluations had data missing that should have been completed.
- It appears ABC will not do business with clients whose incident rate is above 10. Perhaps a more appropriate benchmark would be the Bureau of Labor Statistics (BLS) industry benchmarks. By comparing clients’ incident rates to industry benchmark rates, ABC may be better able to gauge safety performance.
- Require 300 logs (or 300A Summaries) of *all* ABC Workforce clients. While review of client’s 300 logs or 300As occurs pre-assignment, ABC should determine the desired frequency of updating such information in their records.

Recommendations:

- An increased focus should be placed on demonstrated competencies for those responsible for worksite evaluations. Training is one aspect of this. Shadowing/mentoring is another.
- ABC Workforce should address the frequency of follow up worksite evaluations. The feasibility of the stated frequency of visits in the policy should be investigated and if found not to be feasible, adjusted within the policy to something doable.
- Consider companywide adoption of an automatic “scheduling” mechanism for follow up worksite evaluations based on original worksite evaluation date, status of client (active), and other factors such as hazard level of jobs (as noted in client worksite assessment sections completed). With ABC’s *WonderfulWorkforce* software system, it appears this could be done.

Section 5—Staffing Firm Responsibilities for Incident Management

Strengths:

- An ABC representative meets the injured worker at the medical facility upon initial injury first visit dependent upon the severity of the injury.
- ABC Workforce has a protocol in the form of a written checklist of all the steps in post-injury management (Form WCPIM-25). Most WC files had this checklist completed.
- Several branches had a “packet” of forms in a folder ready to go in the event of an injury to a worker. Some even kept packets in their car in the event they were notified of an incident after hours and they were on call. This is a best practice and should be encouraged at all branch offices.
- There is a corporate function that serves as a final quality check on incident investigations (see Recommendation below for enhancing this function).

Opportunities:

- While the KS branch only had one WC claim to review, that file had no documentation of an incident investigation having taken place. While staff thought one had been done, and upon trying to view the investigation documentation on the corporate system, one could not be found. Upon interviewing staff there, one member indicated that because the client was not renewing



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the assignment and no other workers were going to be placed in that specific job, that they thought one was not necessary. It is good practice, and ultimately of benefit to ABC Workforce, to conduct investigations of every injury report to collect vital information that may prevent future incidents even if not at this client or this particular branch. Lessons learned can come from incident investigations that should be reviewed at corporate and collectively summarized for lessons learned, then filtered back out to all branch offices.

- In the AL branch, it was clear that the *worker* had filled out the Accident/Incident Report (Form WCPIM-12), not the staffing firm representative. Only one incident investigation had been performed of the 4 WC files reviewed. Other branches suffered some inconsistency as well, while to a lesser degree.
- The quality of incident investigations could be enhanced. The form itself does not allow sufficient capture of information to determine true or multiple root causes. The training for individuals responsible for completing investigations should focus on the process of incident investigation, identification of root cause(s), and selection of appropriate corrective action. The outcome of investigations should feed back into enhancement of the selection and interview processes, worksite evaluation, and follow up forms. Data from investigations across ABC and ABC should inform trouble spots and spur action plan development to prevent future incidents. The majority of incident reports reviewed were lacking a capability to fulfill these purposes.
- Language in the Injured Worker Job Safety Analysis (JSA) (Form WCPIM-4) could be construed by the worker as punitive or “blaming the worker”. In #4, it asks “Describe how you could have prevented the injury.” A better phrase to use would be “Describe what you think could have prevented the injury.” This leaves open the possibility that the true root cause is something external influencing a worker’s behavior.
- ABC does not have a verifiable method for triaging injured temporary workers by use of an occupational nurse hotline or their own in-house nurse.
- ABC does not have a documented return to work program. There are situations where the injured workers can work in the ABC branch office while recovering from injuries. While this can meet the need for a select few workers, this method would not be acceptable if several workers required accommodations at the same time.

Recommendations:

- Conduct onsite incident investigations for all injuries where possible, regardless of client, assignment, situation, etc.
- Review the incident investigation process (form, training of investigators, quality of root causes and corrective actions recommended) and look for ways to enhance it. Benchmark against other companies (not necessarily even staffing-specific) to see what they do, how they use the information, control quality, etc.
- Develop/adopt a verifiable method for triaging injured temporary workers by use of an occupational nurse hotline or contract.
- Establish dialogue with clients and/or not for profit organizations where RTW candidates may perform service until they are able to return to work full-time.



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Section 6—Staffing Firm Verification of Client Responsibilities for Incident Management

Strengths:

- ABC documents the client's willingness to accommodate an injured worker through a return to work assignment and tracks workers' accommodations.
- ABC's right to perform an onsite incident investigation is included in the Terms and Conditions of Service agreed to by the client.

Opportunities:

- While data on the incident reporting form would allow for tracking of injury report timeliness, it doesn't appear ABC is tracking this (it may be happening at a corporate level and the reviewer may not have had a chance to review). Tracking this metric allows ABC to set a baseline performance measure and then monitor improvements over time. Report timeliness impact WC costs dramatically and should be measured.
- Some WC files included a copy of the client's incident investigation. This was not the norm, however. ABC could consider adding a field to the Accident Investigation form prompting the investigator to request the client's investigation with note to attach it to the ABC investigation. It could also be added as a checkbox on the WC claim checklist. Not all clients will necessarily provide the investigation nor conduct one themselves, but noting that one was requested, whether one was done by client, and whether one was received could be worth tracking.

Recommendations:

- If not already doing so, track injury report timeliness, monitor it over time, and set goals for improvement.

Section 7—Contracts

Strengths:

- Safety is outlined in sections 4-7 of the ABC Client Agreement and sections 3-5 of the ABC Workforce Terms and Conditions of Service agreement and meets best practice standards.
- Staffing firm rights to be informed of changes in worker responsibilities, the right to limit hazardous activities being performed by workers, and the right to perform an onsite investigation for any injury or accident involving a worker is detailed in the Client Agreement.
- During RFP processes, ABC includes temporary worker safety position/statement/information to the requesting party. Expected safety practices of clients are emphasized and highlighted in all aspects of such processes.

Opportunities:

- If it is not already included, ABC may want to add to its rights the ability to conduct a thorough onsite risk assessment and periodic follow ups into its Client Agreement (reviewer did not find it).

Recommendations:

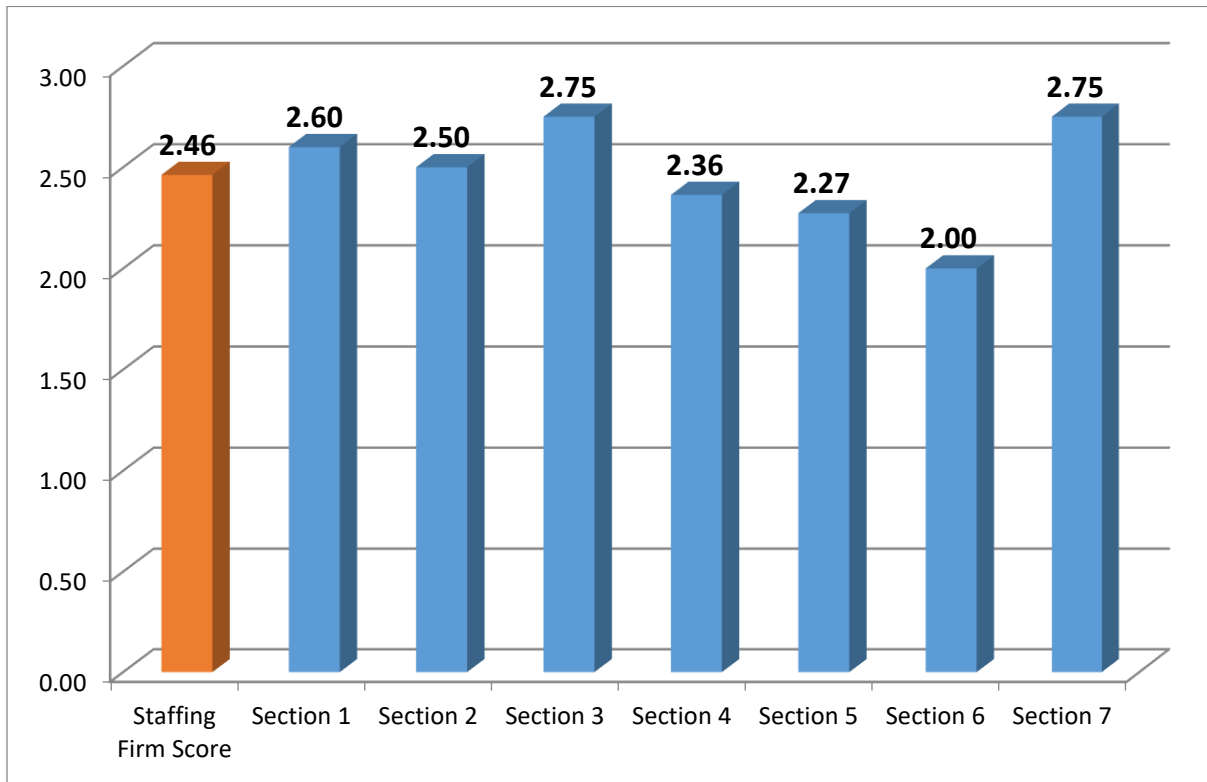
- None



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Congratulations on earning the Safety Standard of Excellence mark! Your firm is to be commended for adhering to safety best practices and the protection of temporary workers.

Scores for each section of the Safety Standard of Excellence Assessment as well as the overall ABC Workforce score can be found below. Individual criterion scores are included as a separate attachment to this report.



NSC CONTACTS

Questions regarding this report should be referred as follows:

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