SAFETY MANAGEMENT

Tulsa District, Safety Office

Jerry Cummings

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*The views, opinions, and findings contained in this report are those of the author(s) and should not be construed as an official Department of the Army position, policy or decision, unless so designated by other official documentation.*
Cost of an Accident

- **On the surface** (Direct Costs)
  - Injury, property damage

- **Beneath the surface** (Indirect Costs)
  - Lost Time
  - Cost of new equipment
  - Increased premiums
  - Production Delays
  - Fines & Legal Fees
  - Loss of future contracts
CONSTRUCTION ACCIDENTS

Electrical
Material Handling
Falls

Equipment Damage
Keys to keeping your workers safe

- Active Safety Program
- SSO is a fulltime responsibility
- General KTR’s responsibility
- Quality Control & Quality Assurance resp...
- Qualified Competent Persons
- *Temps!*
EM 385-1-1;
Safety & Health Requirements Manual

- Safety Reference for Corps of Engineer projects
  - 29 CFR 1910 (General Industry)
  - 29 CFR 1926 (Construction)
  - FAR Clause 52.236-13

- Table of Contents
  - Program Management to Confined Space

- Electronic version:
Program Management
Section 1

- Accident Prevention Plan
- Activity Hazard Analysis
- Inspection Requirements
- Site Safety Officer
- Competent Person Requirements
- Indoctrination Training
- Safety Meetings
- Mishap Reporting
- Emergency Planning
- Visitors
Accident Prevention Plan (APP)

- Accident Prevention Plan
  - Minimum Outline
    - Appendix A
  - Must be accepted
  - Must include required programs
  - Update as required
  - Subcontractors provided copy

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U.S. Army Corps of Engineers Safety Inspection Checklist
Abbreviated Accident Prevention Plan

<table>
<thead>
<tr>
<th>Location (Plant or Facility)</th>
<th>Contract Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contractor Name</td>
<td>Project Name</td>
</tr>
<tr>
<td>Inspector Name (Print)</td>
<td>Inspector Signature</td>
</tr>
</tbody>
</table>

This checklist serves as a guide only. It does not replace or eliminate the need to comply with the requirements set forth in Engineering Manual 351-1-1, Safety and Health Requirements Manual, dated 20 September 2014. The references located in this checklist correspond to the applicable sections of EM 351-1-1. If service, supply and R&D contracts with limited scopes are awarded, the contractor may submit an abbreviated Accident Prevention Plan. This APP shall address the following areas at a minimum. If other areas of the EM 351-1-1 are pertinent to the contract, the contractor must address these areas as addressed as well.

1. Signatures:
   - Includes the name, signature, and title of the Plan Preparer:
     - General (i.e., corporate safety/health officer, OCC).
   - Includes the name, signature, and title of the Plan Approver (e.g., owner, company president, regional vice president).
   - Includes the name(s), signature(s), and title(s) for Plan Concurrence (provide concurrence of other applicable corporate or project personnel/contract).

2. Background Information:
   - Includes the Contractor Name.
   - Includes the Contract Number.
   - Includes the Project Name.
   - Includes the Brief Project Description.
   - Includes the Location of the Project (map).
   - Includes a means to evaluate the work being done (see AHA requirements in 61 A 13) and associated hazards involved.
   - Addresses the identified hazards involved and the control measures to be taken.
   - Statement of Safety and Health Policy detailing their commitment to providing a safe and healthful workplace for all employees.
   - Responsibilities and Lines of Authority:
     - Includes the identification and job responsibilities of personnel responsible for safety - at both corporate and project level - including their resumes.
     - Includes the lines of authority.
   - Training: new hire, SSC orientation training at the time of initial hire of each new employee and any periodic retraining/recertification requirements.
   - Procedures for site inspections - assignment of responsibilities and frequency.
Activity Hazard Analysis (AHA)

- Each work activity/new phase of work will have an AHA
  - Job Steps
  - Hazards
  - Actions to eliminate hazards
  - Equipment
  - Training
  - Inspection
  - RISK ASSESSMENT CODE

- Include names of competent persons
Mishaps (Accidents)

- All mishaps are reportable.....

- First Aid Cases
  - OSHA 1904 List

- Collaborative Effort!
  - Complete ENG 3394 w/ assistance of Contracting Officer Representative

- First Aid / CPR training
Safety Deficiency Tracking Log

- Safety deficiency log
- Not the same as Daily Report
- Requires:
  - Date identified
  - Description
  - Person responsible for correcting
  - Projected resolution Date
  - Date resolved
- Reference 01.A.13 d.
Identifiers to a safe project site

- Project Safety bulletin board
- Active safety officer
- Inspections documented
- Organized site (housekeeping)
- Information posted
- Documentation on hand
- Safety Deficiency Tracking System
Questions
Tulsa District Contracting

John Nadig

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CONTRACTING DIVISION

- Real ID Act of 2005
  - Current OK drivers licenses are not Real ID compliant
  - OK has limited extension through June 6, 2017
  - OK licenses will then not be honored when entering military installations
  - Specific access requirements can vary by installation
  - Contractors are responsible to ensure their employees have appropriate identification for access
- eSRS – submit timely
- Contract and Task Order numbering change (end of March)
- Preference that construction contractors utilize a commercial electronic payroll submittal system
  - Examples: EMARS, LCPtracker, Elation, Hill International, etc.
- Read evaluation criteria closely
  - Be sure that you provide all requested information
  - Do not go past page limitations
Tulsa District
Small Business

Gene Snyman

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Mentor Protégé

New Mentor Protégé Regulations:
Implementation of Mentor Protégé
Program for all Small Business Concerns

• The SBA has established a new mentor protégé program similar to the 8(a) mentor protégé program.

• While this program is similar to the 8(a) mentor protégé program, the 8(a) program will continue to operate and be processed separately, addressing the concerns that are unique to 8(a).

• 8(a) firms may also transfer the mentor protégé relationship when it leaves the 8(a) Program as long as the firm notifies the SBA in writing and provided that the firm is still qualified for the program to which it is transferring.
Mentor Protégé

- Designed to encourage approved mentors to provide various business development assistance to protégé firms
- Purpose to enhance the capabilities of the protégé in meeting its business plan goals
- Accomplished through approved agreement that generally includes
  - Technical and/or management assistance
  - Financial assistance (like equity investment, loans, subcontracts and prime contract performance, including JVs)
Mentor Protégé

• Mentor qualifications
  • Can be a small business- New Rule
  • Favorable financial health- NEW Rule -Must meet the requirements of the MPA
  • Good Character/Not debarred/suspended
  • Generally, can only have one protégé at a time, but the absolute cap is 3 (for any SBA Program e.g. 8a MP)
  • There would have to be a demonstration that the additional mentor protégé relationship would not adversely affect the development of the protégé firm (any of them), by being a competitor, etc.
Mentor Protégé

• Protégé Qualifications
  • [Be in the developmental stage or] GONE
  • [Never received an 8(a) contract] or GONE
  • [Have a size standard that is half the size standard corresponding to its NAICs Code] GONE
  • Good standing/no proceedings
  • Generally, can have only one mentor, but no more than 2
  • [May not be a protégé and a mentor at the same time] GONE
Mentor Protégé

A Firm can be a Mentor and a Protégé at the Same Time

• The final regulation allows a firm to be both a mentor and protégé at the same time where it can demonstrate that the second relationship will not compete with the first.
Mentor Protégé

Benefits of the Mentor Protégé Relationship

• A protégé may JV with its SBA approved mentor and qualify as a *small business* for any Federal government contract or subcontract, provided that the protégé qualifies as small for the size standard corresponding to the NAICS Code assigned to that procurement.
Mentor Protégé

Written Mentor Protégé Agreements

• The SBA believes the benefits identified in the MPAs should be clearly and specifically identified and tied to protégé’s business plan.

• This identification and measurement includes a timeline for the assistance delivered.

• The regulation also clarifies that a subcontract from a mentor to a protégé or a protégé to a mentor can be developmental assistance authorized by the MPA.

• The final regulation will continue to authorize two three-year MPAs with different mentors, but will allow each to be extended for a second three years provided the protégé has received the agreed upon business development assistance and continue to receive assistance.
Mentor Protégé

Written Mentor Protégé Agreements

• SBA will not approve the agreement if the SBA determines that the assistance to be provided is not sufficient to promote any real developmental gains to the protégé or if the SBA determines that the agreement is merely a vehicle to enable the mentor to receive small business contracts.

• The mentor protégé agreements submitted to the SBA for approval must identify how the assistance to be provided by the mentor is different from the assistance provided to the protégé through another mentor protégé relationship, either with the same or a different mentor.

• The agreement will be reviewed annually by the SBA.
Mentor Protégé

Mentor Protégé Programs of Other Departments and Agencies

• The NDAA 2013 specifically excluded the Department of Defense’s mentor protégé program, so that will not be dealt with here.

• Under the provisions of the NDAA, the other agencies or departments that are currently operating a mentor protégé program may continue to operate that program for one year and then go through the SBA’s approval process in order to receive the mentor protégé benefits of the SBA.