

# SRP Contractor Safety Management (CSMP) Program Standard

<b>Procedure</b>	SRP Contractor Safety Management (CSMP) Program Standard	
<b>Procedure Owner</b>	Safety Services	
<b>Approving Authority</b>	Risk Management Director	<b>Review Cycle:</b> As Needed

## 1.0. PURPOSE

The purpose of the Contractor Safety Management Program (CSMP) is to establish a set of standards that emphasize SRP's commitment to a safe workplace, hold contractors responsible for their safety, and ensure effective risk transfer through contracts and insurance certificate records. This policy supports SRP and the Occupational Safety and Health Administration (OSHA) safety requirements.

## 2.0. APPLICABILITY

This standard applies to all SRP employees performing Contractor management functions including Contractor pre-qualification, evaluation, and performance monitoring. This standard establishes minimum Contractor safety requirements for Contractor safety pre-qualification and clear responsibilities for SRP employees engaged in Contractor management. Employees supervising or directing Contingent Workers who perform Contractor management functions must ensure the Contingent Workers adhere to the applicable provisions of this standard when performing work for the company.

## 3.0. DEFINITION OF TERMS

**Terms used in this document shall have the definitions provided below or, where applicable, the same definition detailed in the Glossary of Terms found in the SRP Enterprise Supply Chain Policy and Standards document.**

**Experience Modification Rate (EMR)** - A numerical factor used by insurance companies to assess a company's historical claims experience and to predict future risk. An EMR of 1.0 represents the industry average; values below 1.0 indicate better-than-average performance and typically result in lower premiums, while values above 1.0 suggest higher risk and may lead to higher premiums.

**Hazard Assessment Safety Plan (HASP)** – If required by SRP, a document completed by the SRP Requestor to summarize the scope of work and to identify all applicable hazards associated with the work. The contractor reviews the description of the work and hazards detailed in the document and documents mitigating work practices and procedures based on the risks identified.

**Pre-Qualification Questionnaire (PQQ)** – A document that is completed by the contractor under consideration for hire as part of the ISN evaluation process. The questionnaire is designed to document the Contractor's safety history and safety programs to help determine suitability to safely work on behalf of SRP.

#### 4.0. ROLES / RESPONSIBILITIES

**Purchasing Agents** are the sole persons authorized to bind and enter into purchase order commitments on behalf of SRP. Purchasing Agents will guide the sourcing, evaluation, CSMP safety pre-qualification, and award processes. The CSMP safety pre-qualification processes will be completed in coordination with the Requestor and Safety Services. All other Purchasing Agent roles and responsibilities are outlined in the Enterprise Supply Chain Policy & Standards.

**Requestor** shall initiate purchases of services through a Purchasing Agent. Once the purchasing process is complete, the Requestor shall also work with Safety Services to ensure that all Onboarding, Performance Monitoring, Evaluation and Communication requirements laid forth in this standard are met. All other Requestor Roles and Responsibilities are outlined in the Enterprise Supply Chain Policy & Standards.

**Requestor Director** will have the ability, in conjunction with the Director of Risk Management, to approve a contractor who does not meet minimum safety standards at any point during CSMP safety pre-qualification process. Both approvals will be documented in writing (ie: email) and attached to the applicable purchase order.

**Director of Risk Management** will be responsible for reviewing and approving, in writing (ie: email), all contractors that fall below the safety pre-qualification benchmark or must be approved outside the standard approval process.

**Safety Services** will assist the Requestor and Purchasing Agents as necessary in the performance of their respective roles and responsibilities as defined in this standard. Safety Services will also ensure that all requirements of this standard are communicated to the appropriate parties and that these regulations are consistent with Federal, state, and local standards.

#### 5.0. STANDARD DETAIL

##### 5.1 Work Classification and Grading

All types of work will be classified according to the risk it poses to SRP. The table below contains three different Tier Groups: Tier 1, Tier 2, and Exempt. Work classified under Tier 1 and Tier 2 is considered 'High Risk' work and the Exempt Tier Group is considered 'Low Risk' work. The following table shall be used as the guide and standard for these work classifications.

Pre-Qualification Tier Criteria			
Tier Group	Standard	Type of work	Notes
Tier 1	1910.269 1926 Sub V	Any contract construction and/or maintenance work in which SRP meets 269 "host employer" definition (Subs, Line ROW, Generation).	Example: Any contractor touching or exposed to the Grid while performing the work required by their contract. The "Grid" includes Generation, Transmission and Distribution installations, lines, and equipment.
Tier 2	1910 1926	Any construction and/or maintenance contract work that has a greater than minimal safety hazard exposure and is not classified as Tier 1.	Example: Contractor performing services listed as High Exposure to Risk on the Risk Matrix and not exposed to or working directly on the grid.
EXEMPT		Minimal Exposure	Examples: Contractors providing services listed as Low Exposure to Risk on the Risk Matrix.
<i>Note: A Contractor that performs work in multiple Tiers or Risk Exposures will be classified by the highest level of worked performed.</i>			

SRP Safety Services reserves the right to re-classify Low Risk Work per Appendix A as High Risk Work depending on the circumstances of the work.

Contractors performing High Risk work (Tiers 1 & 2) will be subject to the CSMP requirements contained herein. Contractors performing Low Risk work (Exempt) will be exempt from the CSMP requirements.

#### 5.1.1 Low Risk Contractor

Contractors performing Low Risk work will be exempt from enrolling in ISN as a requirement for performing the applicable work for SRP. This exemption does not absolve Contractors performing Low Risk work from adhering to all Federal, State, Local and SRP Safety rules and regulations.

#### 5.1.2 High Risk Contractor

Contractors performing High Risk work will be required to submit a pre-qualification safety review prior to entering into a contract with SRP. This safety review will be conducted by ISN, a third-party reviewer. Contractors will be required to subscribe to ISN as part of the pre-qualification safety review process. The purpose of the ISN Safety Review is to validate that the Contractor's safety program and performance is acceptable. A Contractor will not be required to subscribe prior to or as a condition of bidding on a job for SRP but will be required to obtain an ISN subscription and complete the safety pre-qualification process with results satisfactory to SRP prior to being awarded an SRP purchase order. If safety performance is to be factored into a bid evaluation, the Request for Proposal (RFP) may request that bidders provide EMR scores for the current and previous three years. The EMR scores from each bidder can be then averaged and factored into the proposal evaluation.

##### 5.1.2.1 Contractor Grades

Contractors will be evaluated and graded as part of the ISN safety evaluation. The ISN safety evaluation grade will be the combined results of scoring, at a minimum, an ISN RAVS 360 review, the SRP Pre-Qualification Questionnaire (PQQ) and, if available, historical data (post-PO reviews, safety audits, etc.)

The ISN RAVS 360 Review is an internal process within ISN that reviews the Contractor's safety program scores them with respect to risk posed to SRP.

The SRP PQQ will be used in concert with the RAVS 360 Review to ensure the following areas of a Contractor's safety program are evaluated:

- a. **Safety History** data includes but is not limited to: Total Recordable Incident Rate, Days Away Restrictions and Transfers (DART) Rate, Experience Modification Rate (EMR), and fatality history.
- b. **Safety and Health Programs** are assessed and include activities such as: substance abuse screening programs, written safety and health programs, and holding regular employee safety team meetings, etc.
- c. **Certifications and Specialty Training** practices are assessed and include activities such as: specialty certifications for specific trades, proactive safety programs/close call reporting and incident evaluation, and OSHA 10-hour or 30-hour training.

Historical Data, if available, will be included in the Contractor grade calculation. Historical Data will include, but is not limited to, Post-PO evaluations, safety audit



scores (closed vs open items), and any other data deemed significant by Safety Services to be included in the Historical Data score.

Final Scores will be calculated for each Contractor and a Contractor Grade will be established. The following table identifies the Contractor Grades and meanings:

Grade	Meaning
A	Contractor received high scores and can be issued a PO
B	Contractor received above benchmark scores and can be issued a PO
C	Contractor received at or below benchmark scores and will need a Mitigation Plan in order to be issued a PO
F	Contractor received below benchmark scores and will need an exemption in order to be issued a PO

#### 5.1.2.2 Mitigation Plan

Any Contractor performing High Risk work and receiving a grade of C will be required to comply with a Mitigation Plan prior to being issued a purchase order. The Mitigation Plan will be established by Safety Services after reviewing the deficiencies from the ISN Safety Evaluation and will include, but not be limited to, a Hazard Assessment Safety Plan (HASP). The template for the SRP Contractor HASP can be found in Appendix A.

#### 5.1.2.3 Contractor Exemptions

Any Contractor performing High Risk work and receiving a grade of F is prohibited from being issued a PO without a Contractor Exemption. The Contractor Exemption Process is defined in Section 5.3.

### 5.2 Contractor Selection

The Contractor Selection Process with respect to Safety is detailed in this section. The Contractor Process Flow Chart is located in Appendix B and can be used a guide to compliance with this section.

1. Requestor notifies the Purchasing Agent of the need to issue a PO to a Contractor. Purchasing Agent determines the work is classified as High Risk using resources such as the Risk Matrix (Appendix A). Purchasing Agents may contact Safety Services for assistance and clarification if needed.
2. Purchasing Agent searches ISNworld for the Contractor and determines if the Contractor is subscribed to ISN. If YES, skip to Step 6. If NO, proceed to Step 3.
3. Purchasing Agent notifies Contractor about the ISN subscription requirement. Purchasing Agents may provide Contractor with [‘CSMP Request For Proposal Addendum’](#) to communicate this requirement to Contractors. Purchasing Agent shall also provide Contractor name and contact information to ISN for outreach.
4. ISN contacts Contractor about the ISN Subscription process. Contractor determines if they wish to subscribe to ISN. If YES, skip to Step 7. If No, proceed to Step 5.
5. If Contractor refuses to subscribe to ISN, Contractor cannot be issued a PO unless the Contractor Exemption Process detailed in Section 5.3 is completed.
6. If Contractor is subscribed to ISN, Purchasing Agent determines if the Contractor is connected to SRP (on the SRP Vendor List). If YES, skip to step 8, if No, Proceed to Step 7.

7. Purchasing Agent triggers a Connection Request and Contractor completes the requirements in ISNetworkd.
8. After the ISN Safety Review, Contractor receives a grade of A, B, C, or F. If Contractor receives a grade of A or B, Contractor has met SRP Safety Requirements and can be issued a PO. If Contractor receives a grade of C, proceed to Step 9. If Contractor receives a grade of F, skip to Step 10.
9. Contractors with a grade of C will be referred to the CSMP Team (Safety Services). Safety Services will review the ISN Safety Review and determine an appropriate Mitigation Plan. Once the Mitigation Plan is implemented by the Contractor and confirmed by Safety Services, Contractor has met SRP Safety Requirements and can be issued a PO. If Contractor fails to implement Mitigation Plan, proceed to Step 10.
10. Contractors that have not met SRP Safety Requirements and cannot be issued a PO unless the Contractor Exemption Request process outlined in Section 5.3 is completed.

### 5.3 Contractor Exemption Requests

An Exemption Request may be initiated for any of the situations described below:

1. The Contractor has received a Grade of F as determined by the ISN assessment
2. The Contractor has received a Grade of C as determined by the ISN assessment and has not agreed to or completed the required mitigation plan.
3. The Contractor is performing work under an emergency purchase order. These cases will be specifically addressed in section 5.3.1.
4. The Contractor refuses to or is unable to subscribe to ISN for any reason.

For categories 1, 2, and 4 as described above, the Exemption Request Form, found in Appendix C, shall be completed by the Requestor and sent to the Safety Services CSMP Team. The form will be reviewed and forwarded to the Requestor Director and the Director of Risk Management for review and approval with signatures. Once the form is signed by both Directors, the contractor will be considered approved only for the project for which the exemption was obtained. All approvals must be attached by the Purchasing Agent to the applicable PO. For work performed under an emergency purchase order, proceed to section 5.3.1.

#### 5.3.1 Emergency Purchase Orders

A Purchasing Agent may place an emergency purchase order without completing the CSMP requirements contained herein ONLY under one of the following conditions:

- Services are needed to ensure the continuity of SRP critical operations;
- Personnel are at risk (unsafe condition that must be corrected immediately);
- Major damage could occur to SRP equipment, facilities or premises

In the event of an emergency purchase, a post-notification must be sent to the appropriate Requestor Director and the Director of Risk Management. These communications must be attached to the applicable PO in SAP.

### 5.4 Contractor Onboarding

All Contractor employees shall complete an orientation prior to entering an SRP facility or jobsite. The type of orientation shall be determined by the applicable Tier Group for the work and the facility where the work will be performed. In some cases, both a general orientation and a site-specific orientation may be required for entry. It is the responsibility of the Requestor and Safety Services to ensure this orientation is completed by the Contractor.

#### 5.4.1 Contractor Tier Designation

	<p><b>Purchase Order Type Selection</b></p>	<p>Issued: SRP Proprietary <span style="float: right;">Page 5 of 11</span></p>
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Work will be designated prior to the sourcing process as Tier 1, Tier 2, or Exempt in order to determine if the CSMP requirements are applicable. Please reference the Pre-Qualification Tier Criteria table found in Section 5.1.

#### **5.4.2 Contractor Orientation**

All Contractor employees shall complete the SRP Contractor Orientation training before entering an SRP facility or worksite. Additionally, Contractors performing Tier 1 work shall also ensure that their employees complete the SRP Contractor Electrical training.

Some SRP locations may also require site-specific training prior to entry. All required training should be available through ISN and the contractor Empower app.

#### **5.4.3 Pre-Construction Meeting**

Prior to the start of work under a PO, the Requestor and Contractor shall hold a pre-construction meeting to discuss scope of work, environmental conditions of the worksite, and other possible safety concerns. This meeting shall include, at a minimum, one representative from SRP and the Contractor.

### **5.5 Safety Performance Monitoring**

Safety Performance Monitoring of contractors shall be a collaborative effort between Safety Services and the SRP Requestor. While some contract work may require more involvement from some departments, the following are the minimum responsibilities of each role:

#### **5.5.1 Incident / Near Miss**

Requestor is responsible for reporting all Incidents and Near Misses involving contractors to Safety Services. The Requestor shall coordinate with the Contractor and Safety Services for the completion of an Incident Investigation. For incidents that do not involve SRP personnel, it will be the contractor's responsibility to investigate the incident/near miss and report findings/corrective actions to Safety Services and the Requestor. Incidents involving SRP employees will be investigated by Safety Services and the Requestor and include the Contractor. Safety Services will store investigation documentation in ISNetwork.

#### **5.5.2 Observations / Complaints**

Any safety related violations, observations, or complaints shall be reported by the SRP Requestor to Safety Services for follow-up with the Contractor. Documentation shall be stored within ISNetwork.

#### **5.5.3. Site Visits**

Any site visits should be a collaborative effort with the Contractor, the Requestor, and Safety Services. Site walks shall be documented in ISNetwork and may also be documented in SOS. Open Actions Items assigned to a contractor will affect the Contractor grade if not closed in a timely manner.

#### **5.5.4 Post-Purchase Order (PPO)Evaluation**

An evaluation form will be completed upon completion of work under a Purchase Order. The PPO Evaluation will be completed by the Requestor and Safety Services with the intent to grade the Contractor's safety performance during the execution of the PO. The PPO Evaluation form can be obtained from SRP Safety Services.

### **5.6 Program Maintenance**

#### **5.6.1 Review term/procedures**

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ISN will review the Contractor Qualification data on a periodic basis not to exceed 3 years to ensure the SRP requirements continue to be met. The results of this review may change Contractor's Grade and will be viewable in the ISNetwork Portal as part of the Contractor's grade history.

## 5.6.2 Recordkeeping

### 5.6.2.1 Contractor Classification and Grading documentation

All evidence of information used to establish Contractor Classification and Grading shall be retained in ISNetwork. While Contractor Grades are reviewed during the PO process, Contractor Grades can change over time. Should a Contractor's Grade change within ISNetwork, historical records of the Contractor's Grades will be retained in ISNetwork, and a notification will be sent to SRP Safety Services, at a minimum. Depending on the Grade change, Safety Services will research to determine if Contractor is actively performing work for SRP and, if so, may require a re-evaluation of the Contractor or implement a mitigation plan.

## 6.0. TRAINING

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### 6.1 Initial Training

ISN will provide Initial Training for use of the ISNetwork Portal and the functionality of their system.

### 6.2 Refresher Training

Refresher training on the ISNetwork system will be provided by ISN on an "as-needed" basis.

## 7.0. APPENDICES

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### Appendix A

#### CSMP Contractor Risk Matrix



**High Exposure to Risk**

Aircraft and Flight Services  
 Antenna Installation  
 Appliance Repair  
 Asbestos Abatement  
 Auto Glass Replacement  
 Awnings and Canopy Installation  
 Barricade Service  
 Bee Removal  
 Blasting Services  
 Boiler Installation  
 Building Cleaning - Interior / Exterior  
 Building Construction Consultants  
 Cacti Removal and Planting  
 Carpenters  
 Chemical Cleaning  
 Compactors - Waste Industrial Service and Repair  
 Computer Cabling and Installation  
 Concrete Construction and Services  
 Construction Clean-up  
 Construction Management  
 Conveyor Maintenance  
 Crane Rental, Maintenance and Repair  
 Demolition Services  
 Divers  
 Drainage Installation, Maintenance, Repair  
 Drilling and Boring Services  
 Dry Wall Installation, Repair  
 Duct Cleaning  
 Dump Truck Service  
 Electrical (Low and High Voltage) Construction  
 Elevator Installation, Maintenance, Repair  
 Environmental and Ecological Services  
 Excavating / Civil Construction  
 Fence Installation / Rental  
 Field Engineering  
 Fire Protection Systems, Maintenance, Repair  
 Flooring Installation, Maintenance, Repair  
 Food/Catering/Cafeteria Services  
 Forklift Maintenance and Repair  
 Furnace Repair  
 Furniture Installation  
 Garage Door Maintenance and Repair  
 Gas - Propane Service  
 Gates and Operating Devices  
 General Contractors  
 General Maintenance and Repair  
 Glass Installation and Replacement  
 Hazardous Waste Disposal  
 Hydraulic Equipment Repair  
 Insulation Installation, Maintenance, Repair  
 Janitorial Services  
 Landscape Installation, Management Services  
 Lighting Maintenance

Load Controller Service  
 Loading Dock Construction, Maintenance, Repair  
 Masonry Construction, Maintenance, Repair  
 Material Handling Equipment  
 Mechanical / HVAC Installation, Maintenance, Repair  
 Metal Fabricators  
 Meter Repair  
 Microwave Installation, Maintenance, Repair  
 Painters (Commercial)  
 Paving Installation, Maintenance, Repair  
 Pest Control Service  
 Pile Driving Construction  
 Pipe Line Installation, Maintenance, Repair  
 Plastering / Lathing Services  
 Plumbing Installation, Maintenance, Repair  
 Power Sweeping Service  
 Pump Construction, Maintenance, Repair  
 Railroad Services  
 Recycling Services  
 Refrigerator Maintenance and Repair  
 Riggers - Truck  
 Road Treatment and Dust Control  
 Roofing Installation, Maintenance, Repair  
 Sand and Gravel Delivery  
 Scaffolding Installation, Maintenance, Repair  
 Scale Repair  
 Security Services  
 Septic Tank Cleaning and Maintenance  
 Sewer Contractors and Cleaning  
 Shoring and Trench Plate Rental, Delivery, Installation  
 Siding Contractors  
 Sign Erectors and Hangers  
 Solar Electric Services  
 Stucco / Texturing  
 Surveyors (Aerial and Land)  
 Tank Cleaning  
 Tank Removal  
 Telecom Construction Services  
 Tile Installation, Maintenance, Repair  
 Towing Services  
 Tree Service / Maintenance  
 Utility Underground Locating  
 Vacuum Cleaning - Underground Pipes  
 Vacuum Service - Utility Location  
 Waste Disposal Services  
 Water Heater Maintenance, Repair  
 Welding  
 Window Cleaning  
 Window Replacement  
 Wire and Cable Installation  
 Wire Rope Inspection and Maintenance

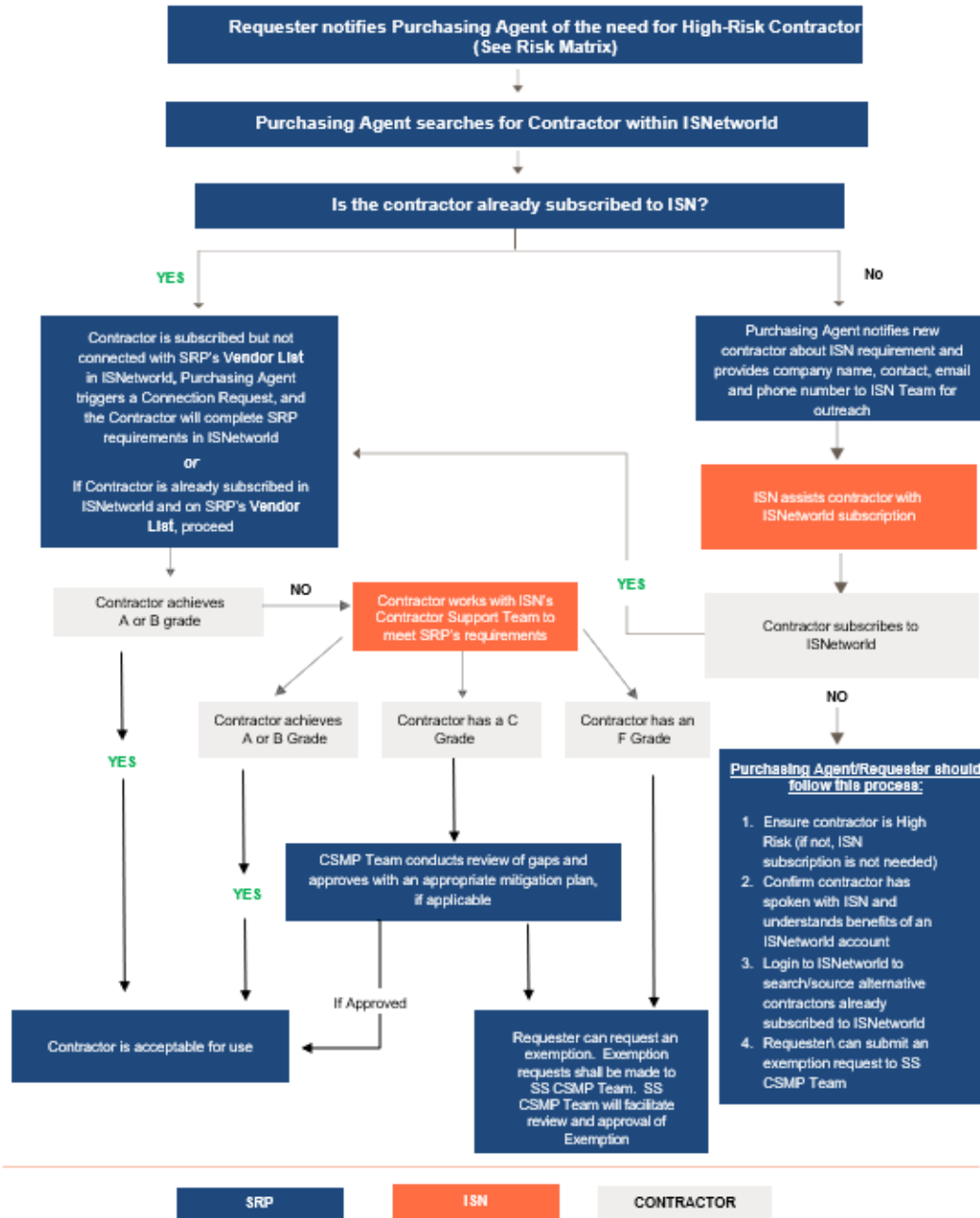
**Low Exposure to Risk**

Accident Adjusters  
 Accident Reconstruction Service  
 Accountants  
 Air Cargo / Package Delivery Drivers  
 Animal Rescue  
 Appraisers  
 Architects  
 Attorneys  
 Audio Visual Repair  
 Bicycle Mechanics  
 Blood Plasma Collection  
 Boat Maintenance and Repair  
 Books - Onsite Setup  
 Calibration Scale Service  
 Car Wash - Onsite  
 Chauffer Service  
 Commercial Film / Radio Production  
 Consultants  
 Copy Machine Maintenance and Repair  
 Cylinder Replacement Service  
 Delivery Service  
 Drug Detection and Testing  
 Employee Training  
 Engineers - Consulting  
 Filter Replacement  
 Fire Extinguisher Service  
 First Aid Instruction  
 Geologists  
 Graffiti Removal

Ice Delivery Service  
 Investigators  
 Junk Dealers  
 Laboratory Testing  
 Linen Supply Service  
 Mapping Service  
 Market Research  
 Massage Therapeutic - Onsite  
 Mediation Service  
 Medical Transportation Services  
 Messenger Service  
 Movers  
 Occupational Therapy  
 Onsite Manufacturer Representatives  
 Packing and Crating Service  
 Photographers  
 Plotting and Blueprinting Service  
 Printers  
 Rental - Storage Containers  
 Seminar Speakers  
 Swimming Pool Maintenance and Repair  
 Trailer Rentals, Maintenance and Repair  
 Trucking - Motor Freight Deliveries  
 Uniform Rental and Delivery  
 Vending Machine Service  
 Water - Bottled Water Delivery  
 Water Purification Service  
 Weed Control - Spraying  
 Windo Tinting

**Appendix B  
 Contractor Selection Flow Chart**





Appendix C

## Exemption Request Form

- ▲ Purpose of this form is to grant the Contractor an Exemption in order to perform work under a PO. This form is only valid for a specific PO and will expire after the completion of work under that PO.

SRP Requestor:		Date:
Facility/Jobsite:		
Project Title:		
Project Manager:		
	<input type="checkbox"/>	<input type="checkbox"/>
Describe the Scope-of-Work:		

### CONTRACTOR CONTACT INFORMATION

*Provide contact information for the company or individual that the variance will cover.*

Company Name:					
<input type="checkbox"/> Primary Contact Person:					
Address:					
Phone Numbers:	Office:		Fax:		Cell:

### REASON FOR REQUESTING VARIANCE *(check all that apply)*

- Contractor's grade is an F in ISNetworld
- Contractor's grade is a C in ISNetworld and has not agreed to or completed the required mitigation plan.
- Contractor refuses to or is unable to subscribe to ISNetworld

Justification for Exemption:

### MANAGEMENT APPROVAL

Role	Name	Signature	Date:
EHS Leader:			
Management Approval:			

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## 8.0. VERSION CONTROL

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Version	Description of Revisions	Changed By	Approved By	Approval Date
1.0	Initial release			
Reviewers			Reviewed Date	

