



HOWARD
UNIVERSITY

CONTRACTOR SAFETY PROGRAM

Howard University
2244 10th Street NW, Washington, DC

This Contractor Safety Program for Howard University. It applies to all our work operations.

INTRODUCTION

All firms contracted by Howard University, because they are employers, are required by the Occupational Safety and Health (OSH) Act of 1970 to provide safe and healthy employment to their employees. It is also our policy as an employer to be responsible for providing a safe and healthful work environment for employees. Contract work, especially in occupied buildings, may present situations or conditions that may adversely impact the safety and health of employees.

1.0 Purpose

The purpose of this standard is to define the minimum requirements for managing dependent and independent contractors hired by Howard University. This includes selection, hiring, training, communication, and continual risk management of contractors. Contractors providing services to Howard University must be selected based upon their ability to their activities in accordance with Howard University EHS requirements, contract specifications, and their historical EHS performance.

2.0 Applicability

This standard applies to all Howard University operations that use/hire/retain a contractor for work activities. This standard applies to dependent, independent or temporary contractor usage, but does not apply to visitors or dignitaries.

3.0 Responsibilities

This standard shall be reviewed and updated, as needed, at least every four years. Next Review will be 2025 at a minimum. ROLES, RESPONSIBILITIES AND ACCOUNTABILITIES

Stop work authority – any person on the job including contractors and Howard employees have stop work authority for immediate safety concerns. These instances can be minor, five-minute stoppages, for short reinforcement of Howard safety values, or they can be major stoppages that require retraining and documentation. The risk level and severity potential will dictate the length of time for the stoppage and it will be assessed on an as needed basis. A work stoppage that is for a high-risk incident and requires retraining and documentation would be instituted by Howard management level or the contractor management level. Everyone on Howard Campus is encouraged to work with safety in mind and value the safety of all stakeholders.

- Howard Management – periodically all Howard Management is expected to tour contractor work and audit for reinforcement of EHS compliance. Any stop work occurrences by management will be communicated the EHS Department.
- EHS Managers – regular attendance to progress meetings and collection of safety data from contractors. Periodic safety audits for facilities and for special construction projects. EHS team members have the authority to speak with contractor managers and review safety training documentation.

- Engineering and Maintenance – Keep abreast of schedules and communicate safety incidents to EHS team. Audit safety periodically and attend safety meetings.
- Competent/Responsible Person – Howard will not provide a competent/responsible person for scaffolding nor confined space, unless Howard employees will be utilizing the scaffolding or entering the confined space.
- Procurement:
 - 1) All personnel responsible for managing contracts will ensure that the “Subcontractor Health and Safety Evaluation Questionnaire – Initial” is completed and returned to EHS prior to mobilization. Deliverables mentioned in this document include: Copies of Activity Hazard Analysis, Training Certificates as identified in the Accident Prevention Plan, the contractor’s accident prevention plan, and Chemical Inventory.
 - 2) Each contractor is provided with warnings of hazards and information about our existing project work, and any information pertinent for abating or avoiding these hazards.
- Contract Employees – required to attend weekly safety meetings and provide Howard updates on any incidents that could harm Howard stakeholders. Sharing and communicating safety incidents is important to keeping the Howard community risk free.

4.0 Requirements

Contractors are required to comply with the plans as stated here. for the contractor to provide a summary of the EHS risks expected for the proposed project and the means to reduce these risks.

A list of required documentation the contractor must provide to Howard University, including (but not limited to) the contractor’s EHS program and information on its past safety performance, including the list below:

- 1) For high-risk construction or maintenance Work, the contractor must provide additional documentation to Howard University to demonstrate the contractor’s EHS programs, employee training or licensing/certification, equipment certificates (for example, crane inspection certificates, site overhead lifting plans), and evidence of competence in the type of services being requested. Activity Hazard Analysis.
- 2) A list of the relevant insurance, including workers compensation, liability, automotive, and any other bonds or insurance certificates relevant to the work that is being contracted, as well as contractual requirements
- 3) Any other documentation that might assist Howard University in evaluating the contractor’s likely EHS performance, such as the contractor company profile and/or recommendations or references.
- 4) The contractor must provide details of all sub-contractors used and provide evidence that they meet the EHS requirements of this standard.
- 5) CONTRACTOR EHS RULES:
 - A. **Hot Work permits** must be communicated to Howard EHS fire safety team. Howard will issue hot work permits for buildings for which they have operational control or for which the O&M contractor has operational control. For buildings that are under control of a construction contractor entirely, the hot works will be communicated to Howard’s EHS, but not issued by Howard’s EHS. The will be issued by the main contractor.

- B. All work will be performed in accordance with applicable regulatory and Howard University requirements, and industry Best Management Practices.
- C. Contractors not following regulatory or Howard requirements will be required to correct them or face disciplinary actions, up to and including termination of the Contract.
- D. Contractors will follow Howard security and access control requirements and must follow the same emergency procedures and response protocols defined for all University personnel, unless stated otherwise in their contract.
- E. Contractors will provide suitable first aid and medial services for their employees working at Howard University sites, consistent with legal requirements, and/or as defined in the contact. This does not prevent a contractor from arranging for Howard University to provide these services to contractor employees under separate contract.
- F. Contractors are responsible to supervise their personnel and provide fully trained personnel while on campus property.
- G. Any Hazardous Chemical or materials brought to the project by the contractor are the responsibility of the contractor, including storage, transportation, utilization, and proper legal disposal or any waste materials.
- H. All safety data sheets for all hazardous chemicals must be provided to Howard University for approval before bringing the chemical to the site.
- I. Unless granted permission from Howard in writing, contractors are not permitted to use any site vehicles or equipment (for example lift trucks, scissor lifts, golf carts.) Contractors are responsible for providing their own equipment and maintaining this equipment in good, safe working condition.
- J. Contractors are responsible to immediately report to site management any incidents that result in injury, illness or environmental releases (for example airborne emissions or discharges to water, wastewater, pavement, soil or sediment) as well as any near-miss incidents that could have resulted in an injury, illness or release. This notification must be flowed by a suitable investigation and corrective actions within 14 days following the incident but not later than the contractor's final day on site conducting work.
- K. Contractors will conduct weekly safety meetings with crew of individuals that will be working on Howard's campus during the week. The attendance of the weekly safety meetings and the topics will be documented and provided to Howard University monthly.
- L. Access to work locations for safety inspections will be provided to all Howard staff, unless it is unsafe to do so.
- M. Howard will provide site-specific EHS orientation training for new contractors.

5.0 CONTINUAL IMPROVEMENT OF CONTRACTOR SAFETY

- Annual review of the written program, including program effectiveness and the processes, policies and procedures in place to support the program
- Annual review of the EHS status of contractors performing services at the campus.

- Annual review with the responsible persons overseeing contractor activities
- Corrective actions and follow up for any identified program deficiencies or opportunities for improvement
- Significant revisions to the contractor management plan shall be communicated in a timely manner to affected parties.

6.0 CONTRACTOR SAFETY DETAILS:

Accident Prevention Plan

When required by the contract, the contractor must develop and implement a comprehensive accident prevention plan for his or her employees, which covers all aspects of onsite construction operations and activities associated with the contract. This plan must comply with all applicable health and safety regulations and any project-specific requirements that our company has specified. The contractor must provide the Contracting Officer with a copy of this plan prior to mobilization. The Accident Prevention Plan is alternatively known as a Health and Safety Plan.

Acceptance of the contractor's health and safety plan only signifies that the plan generally conforms to the requirements of the contract. It does not relieve the contractor of the responsibility for providing employees with a safe and healthful work environment. This concept must be communicated to the contractor.

OSHA Compliance

OSHA Compliance is expected regarding all activities onsite. Howard expects an onsite safety officer for the contractor to be present at least 80% of the time if any more than 8 employees are actively working onsite. Howard does not dictate the methods of following: Line Break, Ladder use, Respiratory protection, compressed gas cylinder use and storage, hot and cold stress, Blood borne pathogens, flammable combustible liquids and PPE. All of these are expected to be addressed in the accident prevention plan and they will be audited for OSHA compliance by Howard.

High-risk activities

Cranes use, scaffolding use, confined space, work at heights, and other high-risk activities will be communicated in advance and the proper training and operating certificates provided in advance to Howard. Howard will not separately monitor confined space and an onsite safety specialist from the contractor is required during high risk activities.

Job safety planning

Activity Hazard Analysis (also termed Job Hazard Analysis or Job Safety Analysis) will be provided for all activities include high-risk and non-high-risk. This documentation must be available onsite and provided to Howard prior to mobilization. The preferred format is the Navy format from EM385, however any format is acceptable as long as the steps, the risks and the mitigating factors are all identified. The Navy format has a risk assessment code that Howard finds useful.

Electrical Safety

Live work must have a separate permitting system. Howard will not provide a permitting mechanism but expects the contractor to document live work rationale and safety precautions prior to activity taking place.

Vehicles

Contractors are not permitted to use Howard vehicles unless permitted in writing. Pre-use Inspections per OSHA requirements are expected when lifts, manlift, or scissors lifts are utilized. Idling for more than 3 minutes is not permitted for non-construction vehicles.

Fire Prevention and Protection -

The contractor shall prepare and carry out an effective fire protection and prevention plan, including provisions for the fire protection and suppression equipment. This plan can be part of the accident prevention plan. Fire watch is expected after welding or torch work and must be documented.

Housekeeping - Good housekeeping, with provision for prompt removal and disposal of accumulations of combustible scrap and debris, shall be maintained in all areas of the jobsite. Self-closing metal containers shall be used for disposal of waste saturated with flammable liquids.

Codes and regulations - The contractor shall comply with the requirements published in the current revisions of the National Electrical Code, National Electrical Safety Code, and the National Fire Protection Association standards, OSHA 29 CFR 1926 or 29 CFR 1910 as appropriate.

Smoking - Smoking or other sources of ignition shall not be permitted in areas where flammable or explosive materials are stored or are present. There is a no smoking policy in effect within all our facilities.

Cleaning and degreasing - Gasoline and liquids with a flash point below 100 degrees Fahrenheit shall not be used for cleaning and degreasing.

Fire extinguishers - Distinctly marked fire extinguishers rated 2A40B:C or greater shall be suitably placed as follows:

1. One for each 3,000 square feet of building area or major fraction thereof. Travel distance from any point of protected area to nearest extinguisher shall not exceed 100 feet.
2. One or more on each floor of buildings with at least one located adjacent to each stairway.
3. At least one located outside but not more than 10 feet from the door opening into any room used for storage of more than 60 gallons of flammable or combustible liquids.
4. At least one located not less than 25 feet, or more than 75 feet from any outside flammable or combustible liquid storage area.
5. At least one within 50 feet of wherever more than 5 gallons of flammable or combustible liquids or 5 pounds of flammable gas is being used.

Noncompliance with Safety and Health Requirements

Failure to correct the violation or continued violations shall be grounds for termination of the contract.

Safety Training

The contractor must ensure that its employees have completed appropriate health and safety training when required by statute/regulation and provide documentation of such training when required by the contract.

Medical Clearance

The contractor must ensure that its employees have appropriate medical clearance when required either by governmental regulations or by our company's requirements. Copies of medical clearance for contractor personnel are required to be presented as specified by the contract.

The Project Officer and the Safety Manager shall determine if additional medical requirements (i.e., Blood serum samples, immunizations) are required for contractor personnel prior to the start of work.

Incident Reporting and Investigations

Howard reserves the right to participate with contractors in the investigations of incidents resulting in injury/illness and/or damage or loss of property and near misses that occur at Howard.

Safety and Personal Protective Equipment

Unless otherwise specified, the contractor is responsible for providing all necessary safety and personal protective equipment (PPE) needed by its employees. This equipment must meet appropriate OSHA requirements and be in good working order.

The contractor shall ensure that its employees have received appropriate training on the use and maintenance of safety and PPE prior to its use. Failure to correctly use appropriate safety equipment is a violation of the contract and may result in default of the contract.