



OSHA CAUTIONS AGAINST ACCIDENT-RATE SAFETY INCENTIVE PROGRAMS

SAFETY INCENTIVE PROGRAMS

Safety incentive programs can play a major role in getting employees involved in the accident prevention process, however **incentive programs focused solely on accident rates can drive injury reporting “underground”, increase the average cost of injuries, and now can set employers up for a Retaliatory Citation under 29 CFR 1904.35 from OSHA.**

Incentive programs that reinforce proactive activities to improve the physical safety of the workplace and improved methods and behaviors while working, such as hazard reporting, attendance at safety training, process improvement suggestions, completion of observations, etc., are permissible by OSHA under § 1904.35(b)(1)(iv). However **incentive programs focused exclusively on reducing the number of injuries and illnesses, that results in withholding a prize or bonus because of a reported injury, would be a citable offense according to a recent OSHA Memorandum.**

Per OSHA, *“an employer could avoid any inadvertent deterrent effects of a rate-based incentive program by taking positive steps to create a workplace culture that emphasizes safety, not just rates.”* For example, any inadvertent deterrent effect of a rate-based incentive program on employee reporting would likely be counterbalanced if the employer also implements elements such as:

- An incentive program that rewards employees for identifying unsafe conditions in the workplace;
- A training program for all employees to reinforce reporting rights and responsibilities and emphasizes the employer’s non-retaliation policy;
- A mechanism for accurately evaluating employees’ willingness to report injuries and illnesses.



Further Reading

Reducing injuries via incentive programs can help improve workplace safety.

[Read more »](#)



Safety Bingo and games of chance may send the wrong message to employees, whereas incentive programs that award points, that don't expire, and can be redeemed in a catalogue, can help reinforce your company brand and assist with employee retention efforts.



Further Reading

Gambling with the safety of employees should never be in the cards.

[Read more »](#)

- The Ohio Bureau of Workers' Compensation provides some ideas for Safety Incentive Programs [here](#).
- **\$afety Pay\$** has been providing OSHA compliant, turn-key solutions for incentive programs since 1991, and one of many vendors available to assist.

Other vendors include:

[Awards Network »](#)

[Safety Awards Store »](#)

[Online Rewards »](#)

And as always, please feel free to contact your IMA Risk Control Representative for additional guidance or ideas for safety incentive programs as well as management accountability programs such as the **IMA Risk Reduction ScoreCard (R2)**.

RISK REDUCTION SCORECARD (R2)

Plant Name/Number:

Plant Location (City/State):

Reported By:

Date (Month/Year):

Position:

Number of Employees:

EARNING POINTS

RISK REDUCTION ACTIVITY	AVAILABLE POINTS	SCORE
Safety Training Topic: % Employees Trained:	% x 35	
Number of Observations Completed (goal=20/month): (1 point for each observation)	20	
Facility Targeted Safety Inspection Completed (Yes/No):	15	
Monthly Safety Committee Meeting Date:	15	
Percent of Inspection Items Completed from last month: %	15	
TOTAL AVAILABLE POINTS	100	

LOSING POINTS

EMPLOYEE INJURIES	AVAILABLE POINTS	SCORE
Number of Lost Time Injuries: (-20 for each lost time injury)	-20	
Number of Lost Work Days without an Accommodation: (-1 point for each lost workday)(Maxed out after 60 days)	-1 each day	
TOTAL LOST POINTS		

GETTING BACK IN THE GAME

EMPLOYEE INJURIES	AVAILABLE POINTS	SCORE
Number of Injuries Reported to Supervisor within 24 hours: (+ 5 for each)	+5	
Number of Injuries Reported to Insurance Carrier/Corporate within 48 hours: (+ 5 for each)	+5	
Lessons Learned shared by the Supervisor with the Plant Manager: (+ 5 for each)	+5	
Lessons Learned shared by the Employee to the Safety Committee: (+ 5 for each)	+5	
Number of "Caught you Being Good" Cards for Employees: (+ 5 for each)	+5	
TOTAL "BACK IN THE GAME" POINTS		

TOTALS	TARGET	SCORE
MONTHLY SCORE	100	
YEAR TO DATE SCORE		