



SUBCONTRACTOR AND MULTI-EMPLOYER COORDINATION

Share the Plan. Control the Interface. Verify the Correction.

POLICY STANDARD

Each employer remains responsible for protecting its employees and complying with applicable requirements. Pheifer Brothers will coordinate hazards within its authority, communicate conditions affecting other employers, verify required controls and protect its employees from hazards created by any employer.

PHEIFER BROTHERS CONSTRUCTION CO., INC.

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NO TRANSFER OF DUTY

Reviewing or accepting a subcontractor plan, permit, inspection, training record or certificate does not transfer the subcontractor's employer duties to Pheifer Brothers and does not guarantee that field performance is safe. Coordination and verification are continuing responsibilities.

Primary References

- OSHA Multi-Employer Citation Policy, CPL 02-00-124
- 29 CFR 1926.20 - employer programs, inspections and qualified equipment operators
- 29 CFR 1926.21 - employee hazard-recognition instruction
- 29 CFR 1926.32 - competent and qualified person definitions
- 29 CFR 1926.1203-.1204 - confined-space host/controlling/entry employer coordination
- 29 CFR 1910.1200(e)(2) as applied through construction Hazard Communication requirements
- Applicable contracts, owner/WisDOT/railroad requirements and Pheifer Brothers policies

1. Purpose, Scope, Definitions and Responsibilities

Purpose and Scope

- Prevent one employer's work from injuring another employer's employees through coordinated planning, communication, separation, inspection and correction.
- Applies when Pheifer Brothers hires subcontractors, performs under another controlling contractor, controls part of a site, or shares work areas with owners, utilities, railroads, suppliers and other employers.

Definitions

- Creating employer: employer that caused a hazardous condition violating an OSHA requirement.
- Exposing employer: employer whose employees are exposed to the hazard.
- Correcting employer: employer responsible for correcting the hazard, often through installation/maintenance of safety systems.
- Controlling employer: employer with general supervisory authority and power to correct or require correction; authority may arise by contract or actual practice.
- Host employer / entry employer: specific roles used in OSHA confined-space coordination. These definitions do not replace the broader multi-employer analysis.

Management / Program Administrator

- Maintain this policy, contracts and qualification standards; provide escalation resources; review serious performance and ensure consistent enforcement.

Project Manager

- Define scope/control responsibilities, prequalify, obtain submittals, conduct preconstruction coordination and resolve contract/engineering/owner issues.

Foreman / Site Coordinator

- Coordinate daily work, orientations, competent persons, inspections, shared systems, correction and emergency response. Document and elevate unresolved hazards.

Subcontractor

- Protect its employees; supply competent supervision, training, compliant equipment and programs; communicate hazards it creates; coordinate and correct deficiencies promptly.

Employees

- Follow site and employer rules, participate in planning, report hazards and stop work. Employees shall not work through another employer's uncontrolled hazard.

2. Prequalification and Contract Expectations

Prequalification

- Evaluate scope-specific experience, safety programs, OSHA/employer history where lawfully available, incident trends, insurance, training systems, competent/qualified personnel, equipment and capacity to perform safely.
- Higher-risk scopes receive deeper technical review: cranes/rigging, demolition, excavation, electrical, confined space, steel erection, scaffolds, blasting/coatings, lead/asbestos/silica, rail and work over water.

Selection

- Safety performance is one factor in selection. A low bid or schedule need does not override inability to provide required controls, personnel, engineering or rescue.
- Identify tier subcontractors and require equivalent oversight. The first-tier subcontractor remains responsible for coordinating its lower tiers within contract authority.

Contract Requirements

- Require compliance with law, contract, owner/project rules, Pheifer Brothers policies and more protective applicable provisions.
- Require hazard communication, competent/qualified person identification, employee training/authorization, inspections, incident/near-miss reporting, emergency cooperation, stop-work, records and timely correction.
- Define who provides/controls shared systems: traffic devices, guardrails, scaffold, temporary power, crane access, excavation protection, sanitation, first aid, fire protection and rescue.

Right to Verify

- Reserve authority to inspect, request supporting evidence, stop affected work, require correction and remove individuals/equipment consistent with contract and law.
- Verification does not relieve the subcontractor of its duties or make Pheifer Brothers the direct supervisor of subcontractor employees.

Representations

- Do not accept generic statements in place of task-specific capability. Certificates/cards must match the person, employer, equipment and work.
- False, altered or misleading records are grounds for disqualification and corrective action.

Kickoff Conditions

- Do not issue mobilization clearance for high-risk work until critical plans, qualified resources and long-lead controls are accepted/available.

3. Pre-Mobilization Submittals and Coordination

Required Information

- Scope, sequence, schedule, crew/foreman contacts, lower tiers, work areas, deliveries, equipment, materials/chemicals, utilities, simultaneous operations and emergency contacts.
- Provide programs/plans applicable to work, including JHA, EAP/rescue, traffic, excavation, demolition, lift/rigging, confined space, fall protection, respiratory/exposure control and hot work.

Personnel Documentation

- Identify competent and qualified persons, operators, signal persons, riggers, entry supervisors, first-aid/CPR responders and authorized employees with task-specific evidence and limitations.
- Plan alternate coverage for absences, multiple shifts and remote work. Stop regulated activity when required coverage is unavailable.

Equipment / Materials

- Provide inspections/certifications and manufacturer data for cranes, aerial lifts, forklifts, scaffolds, trench shields, respirators, monitoring equipment and specialty systems as required.
- Submit SDSs and notify Pheifer Brothers of chemicals/processes that may expose other employers. Identify ventilation, restricted areas, waste and emergency controls.

Technical Submittals

- Provide engineered drawings/calculations and approvals for temporary works, shoring, cofferdams, formwork/falsework, scaffold support, critical lifts, steel erection, demolition, anchors and other designs.
- Field work shall use current approved revisions. Submittal review does not authorize deviations from engineer/manufacture requirements.

Preconstruction Meeting

- Review site-specific hazard plan, interfaces, control ownership, inspections, reporting, stop-work, emergency access/accountability, public/owner/rail/utility coordination and documentation.
- Record decisions, responsible person and due date. Mobilize only after critical actions are closed or protected by approved interim controls.

4. OSHA Multi-Employer Roles and Required Actions

Role Determination

- Evaluate actual facts and authority. An employer may be creating, exposing, correcting and controlling at the same time; contract labels alone do not decide responsibility.
- OSHA first determines the employer's role, then whether its actions met the duty applicable to that role.

Creating Employer

- Do not create violative conditions, even if only another employer's employees are exposed.
- Immediately stop/isolate, warn affected employers and correct or arrange correction. Communicate residual hazards and verify release.

Exposing Employer

- Pheifer Brothers protects its employees even when another employer created/controls the hazard.
- If it lacks authority to correct, it shall ask the creating/controlling employer to correct, inform its employees and take reasonable alternative protective measures. Remove employees in imminent-danger/extreme circumstances.

Correcting Employer

- Meet obligations to install, maintain and correct the assigned protective system with reasonable care. Inspect at the required frequency and after events/changes.
- Examples may include guardrails, scaffold, temporary power, traffic protection or excavation systems when assigned.

Controlling Employer

- When Pheifer Brothers has general supervisory authority, exercise reasonable care to prevent/detect violations and require correction. Inspection frequency depends on project scale, hazard, subcontractor knowledge/history and controlling authority.
- Use competent staff, coordination meetings, field inspections, follow-up and escalation. A subcontractor's promise to comply is not sufficient without reasonable verification.

Limits / Documentation

- Do not direct another employer to violate a standard or bypass its employer duties. Document notifications, actions, restrictions, verification and authority limits.

5. Orientation, Meetings and Daily Communication

Site Orientation

- Before exposure, provide project rules, layout/access, live traffic/internal routes, utilities, restricted zones, PPE, emergency procedures, reporting and stop-work expectations.
- Orientation supplements - not replaces - each employer's task and regulatory training. Verify comprehension and language needs.

Pre-Task / JHA Coordination

- Each employer conducts a task-specific JHA with its employees. Exchange hazards/controls with the Pfeiffer foreman and affected employers before work.
- Address work steps, boundaries, equipment paths, overhead/below work, energy, chemicals/dust/noise, access, emergency/rescue and stop triggers.

Daily Foreman Coordination

- Review schedule, crews, deliveries, traffic shifts, crane lifts, excavations, utilities, work at elevation, confined-space entries, hot work, weather and changing controls.
- Identify simultaneous operations that are individually safe but unsafe together, such as welding above coatings, crane swing over traffic, demolition near excavation or exhaust near confined space.

Coordination Meetings

- Hold at intervals matching project complexity and before major phase changes. Record responsible party, due date and closeout.
- Affected employers promptly communicate changes; meeting minutes do not replace immediate hazard notification.

Shift Handoffs

- Exchange incomplete work, LOTO, open excavations, temporary supports, suspended restrictions, defective equipment, permits, barricades and unresolved actions.
- Incoming supervision verifies conditions and required current inspections.

Communication Rules

- Use direct verbal/radio/visual communication appropriate to conditions. Current drawings, permits, plans and contacts shall be accessible.
- Do not rely solely on signs, email or uploaded records when immediate field briefing is needed.

6. Shared Systems, Interfaces and Control Ownership

Control Matrix

- For each shared system identify provider, designer, installer, inspector, controlling person, authorized modifier, maintenance frequency, users and removal authority.
- Post/communicate restrictions. No employer may alter a shared system without authorization and affected-employer notification.

Traffic and Equipment

- Coordinate external traffic control and internal traffic routes, backing, spotters, delivery zones, crane swing/radius, pedestrian paths and public access.
- Separate people/equipment with positive controls based on risk. High-visibility apparel does not replace separation.

Fall Protection / Access

- Define responsibility for guardrails, covers, scaffold, ladders/stairs, horizontal lifelines and rescue. Verify system design, installation, inspection and compatible user equipment.
- An employer removing a guardrail/cover shall have authorization, provide alternate protection, control the opening and restore/notify before leaving.

Excavation / Temporary Works

- Coordinate competent-person inspections, protective-system design, equipment setbacks, access, utilities, water and adjacent loads.
- Shoring, cofferdam, falsework, formwork and bracing changes require designer approval and notification to every affected employer.

Electrical / Energy

- Identify temporary power owner, GFCI/grounding method, panel access, cord control and inspection. Coordinate LOTO across employers using a group/multi-employer procedure.
- No employer re-energizes or removes another employer's lock. Use a documented handoff and verification.

Housekeeping / Fire / Environmental

- Assign waste, access, snow/ice, combustible control, extinguishers, spill supplies, sanitation and containment responsibilities.
- Shared responsibility does not excuse any employer from correcting a hazard it creates or protecting its employees.

7. High-Hazard and Regulatory Coordination

Confined Spaces

- Host employer supplies known permit-space locations/hazards/precautions to the controlling contractor; the controlling contractor exchanges information with entry and affected employers.
- Coordinate simultaneous entries/nearby work that can create a space hazard. After entry, debrief hazards/program followed and communicate back as required by 1926.1203(h).

Cranes, Rigging and Steel Erection

- Coordinate ground conditions, utilities, work zones, load paths, fall zones, qualified riggers/signal persons, crane inspections, critical lifts, steel stability and work below.
- No other employer enters a crane/erection exclusion or fall zone without authorization. Bar work below steel erection unless effective overhead protection is provided.

Hazardous Materials / Exposures

- Exchange hazardous-chemical lists/SDSs, labels, tasks, regulated areas, exposure data and controls for silica, lead, asbestos, chromium, welding fumes, blasting, noise and other hazards.
- Creating employers notify affected employers before exposure and control migration through ventilation, containment, scheduling, barriers and housekeeping.

Excavation / Utilities

- Coordinate one-call/owner information, positive identification, competent person, protective systems, equipment surcharge, egress and emergency response.
- Do not assume the excavator's protection covers other trades entering or working nearby; obtain competent-person release.

Fall / Water / Railroad / Traffic

- Coordinate fall rescue, PFDs/lifesaving skiff, railroad authority/flagging, live traffic closures and public protection. More protective owner/agency requirements govern.

Permits and Hold Points

- Define issuer, acceptor, affected employers, validity, closeout and restart for hot work, confined space, excavation, rail and other permits.
- A permit authorizes only stated conditions and does not replace each employer's compliance duties.

8. Inspections, Deficiencies and Corrective Actions

Inspections

- Each employer performs required inspections of its work, employees and equipment. Pheifer Brothers performs frequent/regular project inspections consistent with its roles and authority.
- Prioritize fatal/serious hazards, shared controls, repeated deficiencies, inexperienced employers, phase changes, night/remote work and public interfaces.

Immediate Response

- For imminent danger: stop exposure, warn affected parties, barricade/isolate and remove employees if needed. Call emergency resources when appropriate.
- Unsafe equipment shall be tagged/locked out or removed under 1926.20(b)(3). Do not transfer defective equipment to another employer.

Deficiency Notice

- Record date/time, employer/contact, exact condition/location, standard/plan expectation, affected people, immediate protection, required correction, responsible person, due date and verification.
- Use photos where useful without delaying immediate control. Deliver notice to responsible supervision and controlling/owner contacts as needed.

Correction

- The employer responsible corrects promptly and prevents recurrence. Temporary measures require defined monitoring and a permanent-action deadline.
- Pheifer Brothers may correct directly within its authority in emergencies or by agreement; document cost/contract issues separately from the safety release.

Verification and Closeout

- A competent/qualified person, as applicable, verifies the correction in the field before affected work resumes. A photo/email promise alone is not closeout.
- Track overdue and recurring items to management. Escalate if the responsible employer does not respond.

Trend Review

- Review patterns by employer, supervisor, hazard and project phase. Strengthen planning, staffing, training, procurement or contractual controls - not only discipline.

9. Stop Work, Enforcement and Removal from Site

Stop-Work Authority

- Any employee may stop work in good faith for an uncontrolled hazard or plan deviation without retaliation. The signal shall be acknowledged and the operation placed in a safe condition.
- Pheifer Brothers supervisors may stop subcontractor work affecting Pheifer Brothers employees, the public, shared systems or areas within their authority.

Notification and Protection

- Notify the subcontractor foreman and affected employers, establish boundaries and explain the specific hazard/control needed. Do not argue or investigate inside the danger zone.
- If Pheifer Brothers is an exposing employer without correction authority, request correction, inform employees, provide reasonable alternate protection and remove them for imminent danger.

Restart

- Only authorized supervision/competent/qualified person, as applicable, releases work after correction, inspection and rebriefing. Engineer/permit/owner approval is required where the controlling plan demands it.
- Document significant stops and distribute lessons to affected employers.

Progressive Enforcement

- Use coaching/immediate correction for isolated minor deficiencies when appropriate; written notice and corrective plan for serious/repeated issues; suspension/removal for imminent danger, willful bypass, falsification or failure to correct.
- Contractual remedies may include removal of individual/equipment, additional supervision, back-charge, suspension or termination, applied consistently with contract/law.

Individual Removal

- Request removal of individuals who lack required authorization, willfully violate controls, threaten others or refuse direction. The subcontractor remains responsible for employment decisions.
- Do not use retaliation or discourage injury/hazard reporting, medical care or lawful rights.

Preservation of Rights

- Stop-work and coordination actions are safety measures and do not amend contract risk allocation unless authorized in writing.

10. Emergency, Incident and Exposure Coordination

Site Emergency Plan

- Before work, exchange exact address/GPS/access, 911 roles, alarms, evacuation, assembly/accountability, hospital, severe-weather shelter, first-aid/CPR and rescue arrangements.
- Each employer accounts for its employees/visitors and reports status to the site coordinator. Coordinate night/remote work and unreliable communications.

Technical Rescue

- Confined-space, fall, water, excavation, structural and electrical rescue requires trained/equipped resources. Do not assume 911 can provide timely specialized rescue without evaluation/coordination.
- Identify which employer supplies rescue equipment/personnel and backup. Conduct drills appropriate to risk.

Incident Notification

- Immediately report injury/illness, near miss, property/environmental damage, utility contact, public event and serious equipment failure to Pheifer Brothers while obtaining care first.
- Subcontractors make their own required employer notifications/records; Pheifer Brothers management handles its reporting and controlling-contractor/owner duties.

Scene Control / Investigation

- Protect life, call 911, isolate hazards and preserve the scene. Coordinate evidence, photos, witnesses, equipment and records without interfering with authorities.
- Each employer participates and shares findings needed to protect affected employees, subject to privacy/legal restrictions.

Exposure Events

- Notify affected employers after chemical release, silica/lead/asbestos containment failure, noise event, exhaust/fume migration or biological exposure. Identify people, duration, material and controls.
- Arrange medical evaluation/monitoring through each employer's program and preserve exposure data/confidentiality.

Corrective Communication

- Before restart, communicate cause, changed controls, restrictions and lessons learned to every affected employer/shift. Update plans, JHAs and emergency arrangements.

11. Training, Records, Audits and Program Review

Training

- Train Pheifer Brothers managers/foremen on multi-employer roles, authority limits, hazard notification, corrective actions, documentation, nonretaliation and escalation.
- Orient subcontractor supervision to site coordination and ensure its employees receive understandable task/regulatory training from their employer.

Competent / Qualified Persons

- Maintain a project matrix showing role, person, employer, qualification basis, authority, scope/limitations, availability and alternate.
- Review before each phase and after staffing changes. A card/title alone is insufficient.

Records

- Maintain prequalification, contracts, submittals, orientations, competent-person matrix, JHAs/meetings, inspections, notices, corrective closeout, permits, incidents, exposure information and subcontractor evaluations.
- Protect medical/confidential records and retain according to applicable requirements. Printed copies are uncontrolled unless formally issued.

Audits

- Periodically audit field coordination against submitted plans: actual crews/equipment, shared controls, inspections, training and corrections.
- Increase monitoring for high hazard, repeated findings, inexperienced employer, compressed schedule or weak prior performance.

Performance Evaluation

- At project closeout, evaluate planning, supervision, cooperation, incidents, deficiencies, timeliness and documentation. Use results for future selection and conditions.
- Provide fair opportunity to respond/correct factual record errors.

Program Review

- Review at least annually and after serious incident, legal/contract change or recurring coordination failure. Update templates and training.
- This policy cannot address every situation. Stop and obtain management/qualified guidance for unforeseen or disputed responsibilities before exposure continues.

12. Subcontractor Coordination Checklist

VERIFY	EXPECTATION
Scope / tiers	Scope, schedule, work areas, lower tiers and responsible foreman identified
Prequalification	Scope-specific capability, safety systems, staffing, insurance and history reviewed
Plans / submittals	JHA, EAP/rescue, high-hazard plans, engineering, permits and SDSs accepted/current
People	Competent/qualified persons, operators, riggers/signals and first aid verified with alternates
Equipment	Inspections/certifications/manuals, rated capacity and defect-control process verified
Shared systems	Provider, installer, inspector, modifier, maintenance and removal ownership assigned
Interfaces	Traffic, crane, excavation, utilities, fall zones, public, rail, water and adjacent work coordinated
Orientation / JHA	Site orientation and daily task/interface briefing completed and understood
Inspections	Employer inspections and Pheifer oversight frequency/person/records established
Correction	Notice, immediate protection, owner, due date, verification and escalation process understood
Emergency / incidents	Access, accountability, rescue, notification, scene and exposure coordination established
Closeout	Open actions, permits/energy, temporary systems, records and performance evaluation completed

PROJECT / SUBCONTRACTOR:	DATE / PHASE:
SCOPE / LOWER TIERS:	FOREMAN / CONTACT:
COMPETENT / QUALIFIED PERSONS:	SHARED SYSTEM OWNERS:
OPEN ACTION / OWNER / DUE:	INTERIM PROTECTION:
VERIFIED CLOSED BY / DATE:	NOTES / ESCALATION:

13. Test Your Knowledge

Circle the best answer. Review missed questions with your foreman.

1. Who protects a subcontractor's employees? A. Only Pheifer Brothers B. Their employer remains responsible C. The project owner only	2. May one employer have multiple OSHA roles? A. Yes B. No C. Only on federal projects
3. What must an exposing employer do if it cannot correct a hazard? A. Ignore it B. Wait for OSHA C. Request correction, warn employees and use alternate protection/remove them as needed	4. Does accepting a safety plan guarantee safe field work? A. Yes B. No C. Only if signed
5. What closes a corrective action? A. Field verification by the appropriate person B. A promise by email C. A photo without context	6. Who may stop work in good faith? A. Only management B. Only the subcontractor foreman C. Any employee
7. Who may alter a shared guardrail/system? A. Any nearby worker B. Only authorized persons with alternate protection/notification C. The delivery driver	8. What does a controlling employer use to show reasonable care? A. Coordination, inspections, correction and follow-up B. A contract clause alone C. No field involvement
9. What is required for simultaneous permit-space work? A. Separate radios only B. No communication C. Host/controlling/entry employer information and coordinated operations	10. What should happen during imminent danger? A. Finish the shift B. Stop/isolate and remove exposed employees as needed C. Wait for the weekly meeting

EMPLOYEE: _____

DATE: _____

ANSWER KEY: 1-B | 2-A | 3-C | 4-B | 5-A | 6-C | 7-B | 8-A | 9-C | 10-B