

September  
2024

*Workers' Compensation  
Industrial Council*

Workers'  
Compensation  
Safety Initiatives  
Survey

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# Introduction

W. Va. Code §23-2C-5(c)(6) requires the Industrial Council to present a biennial report to the Legislative Joint Committee on Government and Finance that outlines safety initiatives offered and utilized in the workers' compensation market. The report evaluates current private insurer and self-insured employer risk management strategies used to mitigate workplace accidents and control losses. The West Virginia Offices of the Insurance Commissioner (WVOIC) compiles the report and presents the analysis to the Industrial Council for review and adoption of the final report.

To comply with this mandate, the WVOIC developed, disseminated and analyzed a web-based survey form. The forms were created by the WVOIC and are accessible on the [www.wvinsurance.gov](http://www.wvinsurance.gov) webpage. The forms were distributed to the top ten (10) workers' compensation private insurer groups based on 2023 premium market share as well as 49 self-insured employers. The insurer survey consisted of questions including company information, aggregated insured information, safety practices and procedures and the safety opinion of West Virginia employer utilization of insurer services. The self-insured employer survey consisted of questions including company and industry information, safety programs, drug and/or alcohol programs, Return to Work (RTW) programs, industry/employee training, workplace information and additional comments relevant to safety in workplaces. Insurers were asked to submit aggregated responses on behalf of all companies within the group that reported workers' compensation premiums. Self-insured employers were instructed to complete a survey for each company with active self-insured status for West Virginia workers' compensation. A copy of each survey form (insurer and self-insured employer) is provided as [Exhibit 1](#) and [Exhibit 2](#).

One notable change from previous surveys is the inclusion of the WV Counties Risk Pool (WVCoRP) in the insurer aggregated responses rather than reported in the self-insured employer section. The WV Counties Risk Pool is a self-insured, risk bearing group of West Virginia counties and communities that have pooled together for workers' compensation purposes. WVCoRP administers the association and offers the members services such as claims management, safety and loss control, risk management and cost containment measures. While WVCoRP is a self-insured pool, for the purposes of this survey, the services they offer are more aligned with the insurer role rather than an individual employer role. Due to these organizational operations, the West Virginia Counties Risk Pool responses are aggregated with the private insurer data analysis.

This report and analysis rely solely on the responses as provided by the insurer or self-insured employer and have not been examined in a regulatory capacity nor independently verified.

# Private Insurer Section

## Insurer Group Responses

The survey form was distributed electronically to ten (10) carrier groups based on 2023 premium market share. There were 77 total groups that reported workers' compensation premium for West Virginia on the annual financial statements to the National Association of Insurance Commissioners (NAIC). The aggregated market share for the ten (10) groups totaled approximately 83% while the remaining 67 groups reported 17% of overall premium. The ten (10) insurer groups and cumulative market share are provided in the table below.

NAIC Group Code	NAIC Group Name	Cumulative Market Share
291	Encova Mut Ins Grp	41.2%
3548	Travelers Grp	8.5%
212	Zurich Ins Grp	7.0%
408	Brookfield Reins Ltd Grp*	6.8%
213	Erie Ins Grp	5.7%
111	Liberty Mut Grp	4.5%
91	Hartford Fire & Cas Grp	2.8%
626	Chubb Ltd Grp	2.5%
4670	Starr Grp	2.4%
4381	Skyward Specialty Ins Grp	1.7%

\* Formerly Argo Grp US Inc Grp; includes Argonaut companies and Rockwood Casualty Ins. Co.

## Private Insurer Safety Survey Summary

This section will provide a descriptive analysis of the private insurer responses, including WVCoRP, to the survey questions.

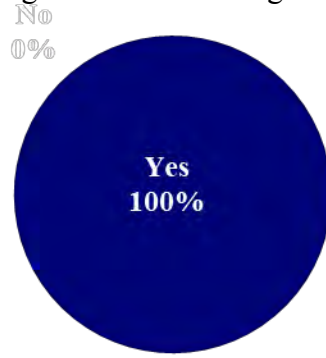
The survey uses written premium market share reports to identify the top 10 insurers required to respond to the survey. The insurers were asked to provide both policy count and written premium as part of the survey. The table below includes a summary of responses by insurer.

NAIC Group Name	WV Policy Count CY2023 Year End	WV Written Premium CY2023 Year End
Encova Mut Ins Grp	8,819	\$111,068,517
Travelers Grp	4,429	\$19,483,670
Zurich Ins Grp	893	\$16,648,816
Brookfield Reins Ltd Grp	432	\$16,103,712
Erie Ins Grp	4,092	\$13,505,140
Liberty Mut Grp	1,230	\$6,123,266
Chubb Ltd Grp	3,653	\$5,995,618
Starr Grp	479	\$5,746,897
Hartford Fire & Cas Grp	5,972	\$5,112,475
Skyward Specialty Ins Grp	55	\$4,143,670
WVCoRP (Self Insured Risk Pool)	141 members	\$5,872,791
<b>Total</b>	<b>30,195</b>	<b>\$209,804,572</b>

The companies reported written premiums totaling \$203,931,781 (excluding WVCoRP). The 2023 overall written premium from the NAIC market share reports for the West Virginia workers' compensation market was \$237,062,427 so the top 10 groups reported 86% of the total premiums. As previously stated, the responding insurers made up 83% of the 2023 market share and based on the current written premiums provided above, it would appear the insurers maintain a consistent market share.

The next section includes graphs that represent aggregated data analysis of the responses by the private insurer groups as well as the self-insured risk pool, WVCoRP.

Do you offer safety and loss programs or risk management services to WV employers?

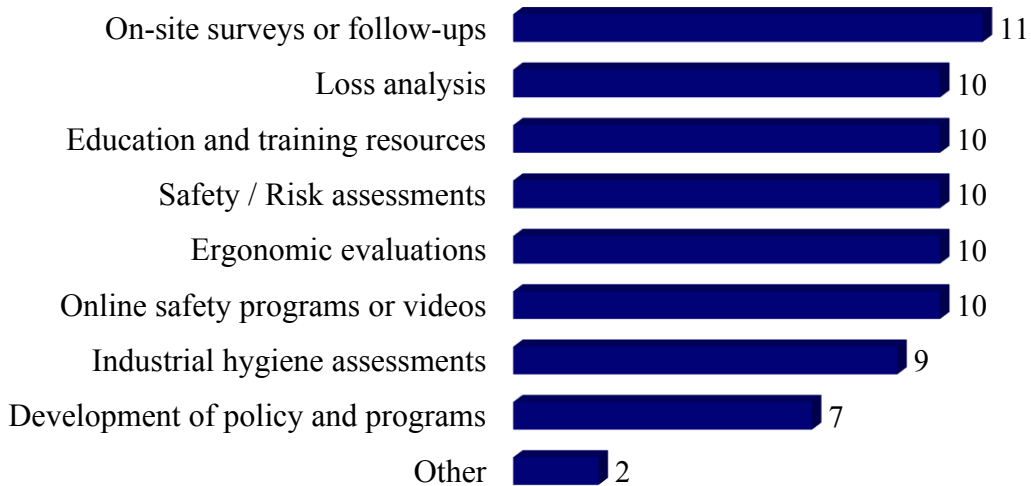


All insurers offer safety and loss programs or risk management services to West Virginia employers.

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A second question was posed to the insurers who responded “Yes” to the previous question.

Please check all types of safety programs and initiatives you offer insureds.



The options above were pre-set options that an employer marked if applicable. If “Other” was selected, the comments below were provided by insurers as additional options relating to types of safety services offered to insureds.

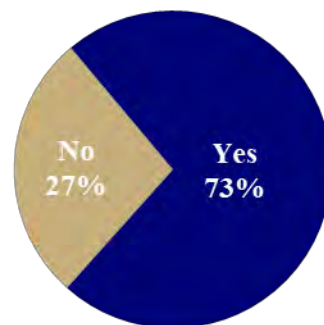
- Erie: Service plan creation and development, implemented with policyholder endorsement.
- Travelers: We provide services with Return-to-Work programs, through on-site consultation and online website resources. While we do not assume the employer's responsibility for development of safety policies and programs, we will assist them with their development of policies and programs.

Six (6) insurers offered a dedicated safety unit to West Virginia policyholders. The insurers offering a dedicated safety unit were Encova, Travelers, Zurich, Hartford, Chubb and WVCoRP. The following additional comments were received as a part of the response:

- Encova: 13 Safety and Loss Control consultants are dedicated to WV employers to provide safety services.
- Travelers: The services referenced in the question above are the primary services offered by our Risk Control Staff. Twenty-Nine (29) Risk Control consultants provided services to WV employers during 2023.
- Zurich: 30 Safety and Loss Control consultants are dedicated to WV employers to provide safety services.
- Hartford: We provide many services including loss analysis, Industrial Hygiene needs, ergonomic assessments and overall workplace safety.
- Chubb: Chubb has a network of close to 500 risk engineers globally available to help WV companies anticipate and minimize exposures. We provide a range of services focused on identifying exposures, assessing the adequacy of existing controls, and helping customers anticipate and mitigate potential costly losses. We offer customized risk management and loss control programs and specialized consulting focused on lessons from losses, industry best practices and consensus standards. The network of risk engineers possesses deep industry knowledge and technical expertise in a wide range of industries. At this time, we do not have any risk engineering staff stationed in WV, however, we have several risk engineers who typically provide our services to WV.
- WVCoRP: 2 Safety and Loss Control consultants are dedicated to WV employers to provide safety services.

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Do you offer regular safety audits to West Virginia employers?



Eight (8) insurers responded “Yes” to this question. Seven (7) of the insurers affirmed that the information obtained via safety audits is used in the schedule rating process.

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The survey required insurers to provide information on utilization of safety services offered to policyholders. The table below displays utilization of services analysis by insurer group.

NAIC Group Name	WV Employer Utilization	WV Premium Utilization	Utilization Premium Percent of Overall WV Reported Premium
Skyward Specialty Ins Grp	55	\$4,143,670	100.0%
Encova Mut Ins Grp	2,634	\$98,147,861	88.4%
WVCoRP	112	\$4,500,000	76.6%
Zurich Ins Grp	13	\$9,188,819	55.2%
Travelers Grp	140	\$6,146,195	31.5%
Erie Ins Grp	165	\$3,046,108	22.6%
Liberty Mut Grp	10	\$1,380,707	22.5%
Brookfield Reins Ltd Grp	54	\$1,702,740	10.6%
Chubb Ltd Grp	1	\$302,797	5.1%
Hartford Fire & Cas Grp	67	\$64,462	1.3%
Starr Grp	9	\$0	0.0%
<b>Total</b>	<b>3,260</b>	<b>\$128,623,359</b>	<b>61.3%</b>

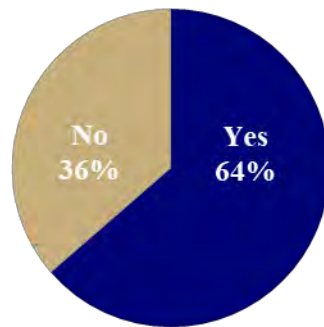
The West Virginia employer utilization includes the policy count of all policyholders utilizing safety services offered by the insurer. The West Virginia utilization premium is the amount of premium generated by employers that utilized safety services offered by the insurer. When comparing the utilization premium to the written premiums reported by insurers in an earlier section of the report, 61.3% of the total written premium is taking advantage of insurer offered safety services. However, when performing the same comparison using the overall West Virginia policy count mentioned in an earlier section to the employer utilization policy count, only 10.8% of policies take advantage of the safety services. The disparity of percentages indicates that the larger, higher premium policies are utilizing safety services while the smaller, lower premium policies are not.

The utilization percentages are affected by an outlier reported by Starr Grp. At the time of this writing, Starr Grp was unable to provide the premium utilization of the nine (9) employers participating in safety programs with the insurer. Starr Grp reported a total policy count of 479 so with only nine (9) policies (1.8% of the total policies) participating in safety programs, it is assumed the premium effect would be minimal to the overall but as stated previously, if the higher premium policies are engaging in the safety services, then the overall could be more substantial.

As a follow-up question to the utilization section, insurers were asked to describe the most utilized safety programs or options by WV employers and provide an approximate count of employer utilization for each program or option.

- Encova: 1. Consultative Service by our 13 dedicated WV Safety and Loss Control Consultants. 2. The Streamery online safety video training service.
  
  - Travelers: 17 - Evaluate Motor Vehicle Records 10 - Fleet Safety Program Improvement 9 Establishing Transitional Duty 7 - Driving Personal Vehicles for Company Business 7 - Safety Meetings 6 - Driver Qualification Files 5 - Motor Vehicle Record Evaluation Criteria 5 - Occupational Health - Exposure Monitoring 4 - Employee Handbook On Safety Policy And Procedures 4 - Late Claim Reporting 3 - DOT Roadside Inspection Out of Service Violations 3 - Post Injury Management Program 3 - Training on Workplace Harassment Policy
  
  - Zurich: Risk Assessment – 13
  
  - Brookfield: Onsite Survey & Recommendations - 49 Industrial Hygiene - 1 Training – 4
  
  - Erie: Consultative Visit – 49; Desktop – 4; Survey – 91; Vendor Survey – 21
  
  - Liberty: Largest used includes industrial hygiene and on-site visits to make and implement recommendations.
  
  - Chubb: Ergonomics – 1
  
  - Hartford: This answer is based on the 67 employers who utilized our Risk Engineering services and have policies in West Virginia. Please know that we may service their account in a different state. - 25 Ergonomic Visits - 4 Industrial Hygiene Services - 38 Loss Analysis
  
  - WVCoRP: Law Enforcement Training -85 employers; Distracted Driving Safety Programs - 100 employers; Fleet Safety - 100 employers; Workplace Safety Programs - 100 employers
-

Do you implement follow-up measures to ensure employer utilization of the offered safety services is effective and appropriate?

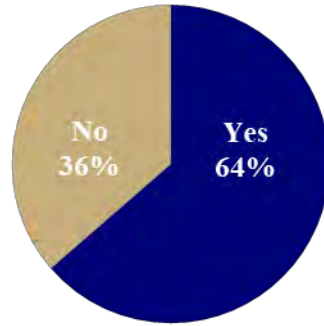


The seven (7) insurers that affirmed follow-up measures are implemented to ensure employer utilization were then asked to provide quantitative metrics used to measure utilization success. The following responses were provided:

- Encova: Reduction in Frequency of Indemnity Claims per \$100 Million in payroll is the primary metric used to measure success.
- Travelers: We track recommendation status, to determine if the customer is making progress, or if the recommendation has been completed. With this internal data, we can quantify the number of recommendations submitted and completed to determine whether the safety services were utilized. We can then compare utilization with loss ratios, measuring utilization success by lower loss ratios.
- Brookfield: 1. Reduction in Loss Ratio 2. Reduction in Experience Modification 3. Reduction in average cost per claim
- Liberty: Quantitative metrics are not available at this time- during on-site visits, recommendations are made and then followed up to ensure appropriate implementation.
- Chubb: Both Risk Engineering Services and Underwriting are responsible for recommendation follow-up activities and documentation of resolution for all critical recommendations. Our risk engineers will discuss recommendations with the responsible contact during the consultation at the end of the survey. This is then followed up in writing with a letter sent to the contact outlining both risk improvement and critical recommendations. As part of the correspondence the policyholder is asked to respond to all critical recommendations within 30 days. If no response is received after 30 days from the initial recommendation letter, a second letter is sent automatically to the contact regarding critical recommendation resolution and timeframes, along with copies to the producer. If no resolution after 60 days from the initial recommendation letter, an additional letter with the recommendations is sent via email to the survey contacts regarding resolution and timeframes. If no response is received within an additional 15 days, an Alert is sent to the underwriter informing them the insured has not responded to the critical recommendation(s). The underwriter must then take action to gain resolution of the critical recommendation(s).

- Hartford: We have an internal quality program where the countrywide success rate is 92%
- WVCoRP: WVCoRP utilizes employer loss history with individual claims analysis to determine potential exposures and utilization success.

If an employer implements a drug and/or alcohol testing program in the workplace do you consider that in the premium determination process?

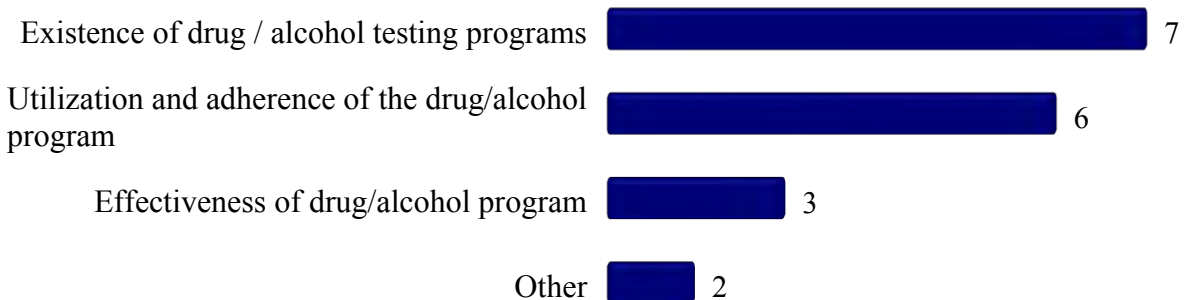


Seven (7) insurers responded “Yes” to this question while four (4) responded “No”. This question had follow-up questions dependent on whether an insurer responded yes or no. The “Yes” response question included pre-selected options to select as well as an “Other” option to include additional comments. The comments below were submitted dependent on the insurer’s answer to the drug/alcohol testing question.

If you answered "No" to the previous question; please provide how you monitor employer implemented drug/alcohol testing programs?

- This topic is part of our overall risk control discussion with employee safety, as well as regulated fleets.
- Part of the assessment or on-site surveys
- WVCoRP offers drug/alcohol program policy reviews and provides guidance and recommendations as needed.

If you answered "Yes" to the question above; what aspects of a drug and/or alcohol testing program would you consider for a premium credit?

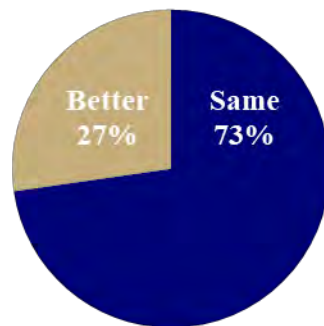


The “Other” comments were:

- Subjective application considering industry, risk exposure, and account risk characteristics.
  - Percentage of employees tested annually.
- 

The last section of the private insurer survey involved an insurer’s safety opinion of West Virginia employer utilization compared to other states and the most commonly used safety and loss programs or initiatives employers are utilizing from the insurer offered selections.

Generally speaking, how do you feel WV employers compare to employers in other states regarding the effective use of safety and loss programs and initiatives?

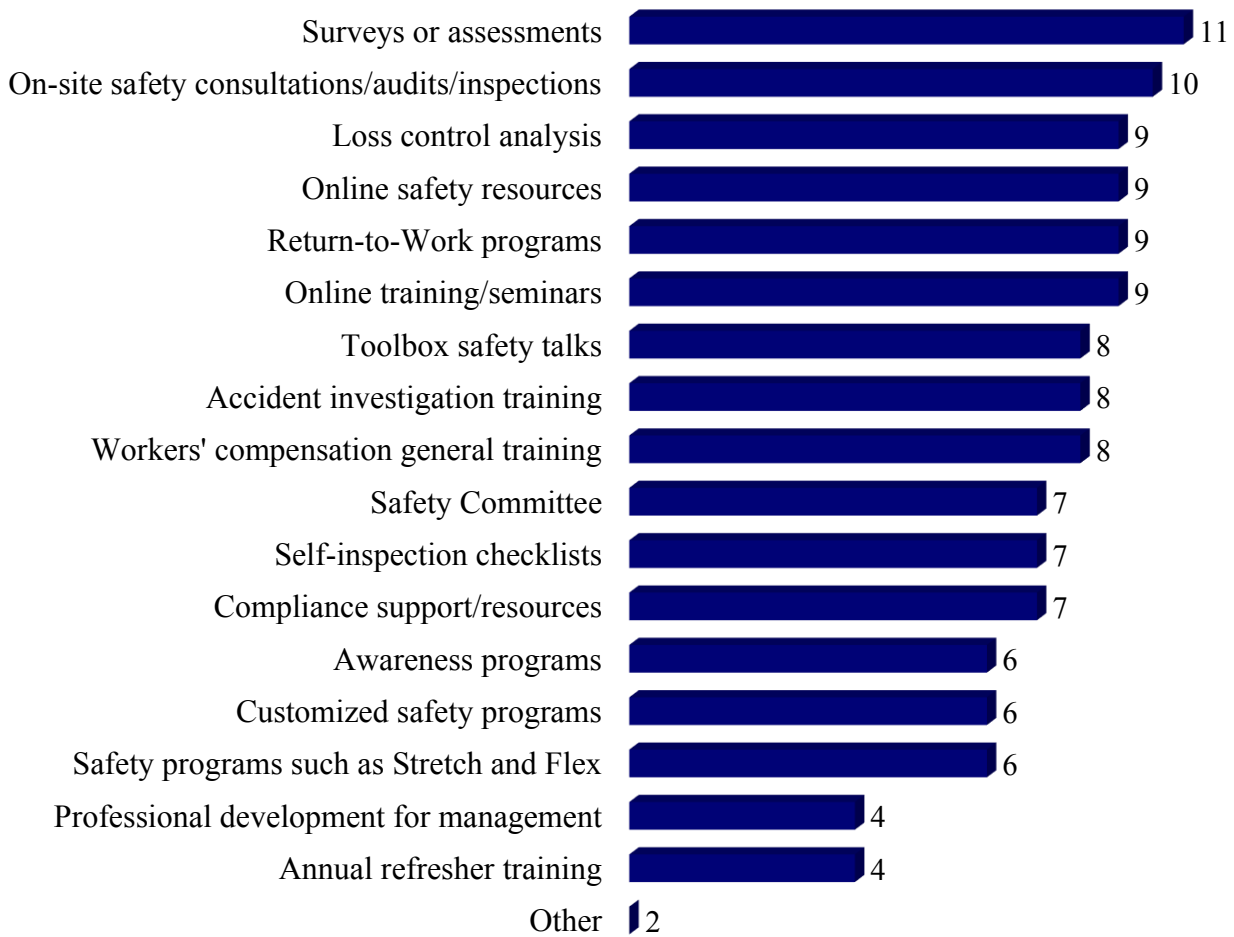


Eight (8) insurers selected “Same” while three (3) insurers selected “Better”. Two (2) insurers selected “Better” in the 2022 survey. The response indicates the West Virginia market is attractive to insurers and reiterates that West Virginia employers compare similarly to nationwide employer safety utilization and implementation.

A secondary question asked insurers what the state of West Virginia could do to encourage employers to utilize safety and loss programs and initiatives. The following comments were provided:

- Based on data analytics such as injury and illness incident rates and DART rates, partner with the DOL and insurance carriers to deploy resources targeted to industries with high frequency and severity of injuries.
  - Additional information to customers on the West Virginia Division of Labor, regarding general safety, machine guarding, and industrial hygiene services they offer to West Virginia employers.
  - Implement a Certified Safety Committee program similar to Pennsylvania's program and offer a 5% credit for certification.
  - If the state, working with NCCI, could develop a uniform program for safety credits, it would become more common knowledge to policyholders.
  - The state can provide additional awareness to employers on the importance of utilizing safety training and program/policy development resources.
-

The insurers selected the most commonly used safety and loss programs utilized by West Virginia employers. The submitted responses include both pre-set selections as well as written answers and are shown in the chart below.



The “Other” comments regarding additional programs offered by insurers included:

- AIHA accredited Industrial Hygiene lab services
- Online safety resources such as webinars, videos, video chat, etc.; Surveys or assessments; Return-to-Work programs; Online training/seminars; Compliance support/resources

## Private Insurer Conclusions

The survey results concluded that all ten insurer groups and the self-insured employer, WVCoRP, offered safety and risk management services to West Virginia policyholders or members of the risk pool.

The most common safety services offered by all insurers included surveys or assessments, on-site safety consultations including audits and inspections, loss control analysis, online safety resources, Return-to-Work programs and Online training/seminars.

Twenty-seven (27%) percent of the respondent insurers indicated that West Virginia employers perform better than national standards regarding the effective use of safety and loss control programs while 73% indicated that West Virginia employers utilize safety programs at the same national rate. This is an improvement in the insurer perception of the West Virginia workers' compensation market as both the 2018 and the 2020 safety reports have a 100% equivalent or "Same" standard and the 2022 report where 20% of insurers answered "Better" than average. Historically, insurers deemed West Virginia employers lacking in safety initiative utilization equality by reporting 50% in 2012, 73% in 2014 and 90% in 2016. This positive trend in safety utilization has resulted in lowered loss costs and premium rates for employers and provides West Virginia workers a safe workplace environment.

In January 2006, the West Virginia workers' compensation market privatized and completed the transition to an open market in 2008. Since that time, West Virginia has realized 19 consecutive loss cost decreases for a total aggregate decrease of 83.7%. When considering the loss cost decreases as well as the number of insurers offering workers' compensation coverage in the West Virginia (~348) in conjunction with the insurer responses indicating that West Virginia employers are 100% better or equal to employers nationwide, these factors indicate a definitive safety culture shift from an injury ridden, abused system to an environment focused on protecting employees and preventing injuries using safety and loss programs and initiatives in the workplace.

# Self-Insured Employer Section

## Employer Responses

The self-insured employer safety survey was tailored to address safety and loss programs implemented by West Virginia employers. As was done with the private insurer survey, the West Virginia Offices of the Insurance Commissioner developed and disseminated a similar web-based survey form that was electronically provided to 49 self-insured employers.

The survey request was sent to the following active self-insured employers:

ACNR Resources Inc.	Highland Mining Company
Alex Energy LLC	Huntington Alloys Corporation
Alliance Coal LLC	Huntington Bancshares Inc.
American Electric Power Company Inc.	JELD-WEN Inc.
Aracoma Coal Company LLC	Kingston Mining Inc.
Asplundh Tree Expert LLC	Lowes Home Centers LLC
Brooks Run South Mining LLC	Marfork Coal Company LLC
City of Fairmont	Monongahela Power Company
City of Huntington	Pepsi-Cola Metropolitan Bottling Co Inc.
City of Parkersburg	Performance Coal Company LLC
City of Wheeling	Pilgrim's Pride Corp of West Virginia Inc.
Columbia West Virginia Corporation	Potomac Edison Company
CONSOL Mining Company LLC	Spartan Mining Company LLC
CONSOL Pennsylvania Coal Company LLC	SWVA Inc.
Cracker Barrel Old Country Store Inc.	TForce Freight Inc.
Delhaize America LLC	Toyota Motor Manufacturing Wv Inc.
Dolgencorp LLC	U S Silica Company
Eastern Gas Transmission	Union Carbide Corporation
Encompass Health Corporation	United Parcel Service Inc.
Exxon Mobil Corporation	Virginia Electric and Power Company
Federal Express Corporation	Wendy's International LLC
FedEx Ground Package System Inc.	West Virginia Counties Risk Pool Inc.
Fiesta Tableware Company	Weyerhaeuser Company
FirstEnergy Service Company	Wheeling Park Commission
General Motors LLC	

All 49 self-insured employers responded to the survey. As previously reported, the West Virginia Counties Risk Pool Inc. (WVCoRP) response was included in the private insurer section, so this section focuses on 48 self-insured employer responses.

## General Safety Programs and Policies

Section 1 of the self-insured employer survey captured company and contact information.

The survey included the respondent's primary industry. The following graphic provides the responses by industry type.



Transportation includes communications, electric, gas and/or sanitary services.

Services include lodging, health recreation, education, legal, restaurant, social services, etc.

Finance includes insurance and/or real estate services.

Section 2 of the self-insured employer safety survey included safety and loss program data as well as West Virginia specific employee information. The responding employers comprise a large population of West Virginia employees and payroll by industry as indicated in the table below.

Industry	WV Employees	WV Annual Payroll
Transportation	8,670	\$679,769,075
Mining	5,020	\$536,266,518
Manufacturing	6,641	\$535,698,217
Retail Trade	6,406	\$152,837,033
Public Administration	1,268	\$53,242,497
Healthcare	966	\$50,484,933
Services	1,598	\$28,487,503
Finance	245	\$21,000,000
Wholesale Trade	106	\$10,500,353
<b>Total</b>	<b>30,920</b>	<b>\$2,068,286,128</b>

Do you have a written safety and loss program for your employees, including provisions for any particular problems associated with the business (such as dust or noise)?



All 48 employers confirmed they do have a written safety and loss program for employees.

Self-insured employers were then asked to mark all safety service categories that applied to their operations. One employer that marked “Yes” did not mark any safety service categories so the graphic below is based on 47 responses.



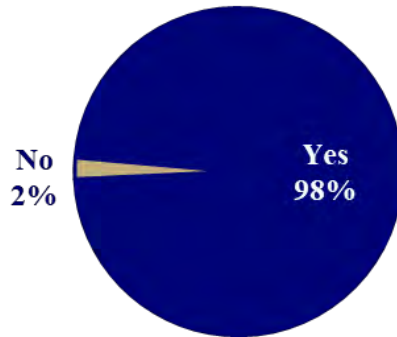
The options above were pre-set options that an employer marked if applicable. If “Other” was selected, the comments below were provided by employers as additional components relating to the company safety program.

- Comprehensive Safety Program
- Governance program, goals and metrics, location specific safety plans and risk-based initiatives, risk-ranking system, contractor safety management program, company safety vision, company safety core value, leadership safety development, safety pledge, incident management database, company chemical management process and database.

The next set of questions relate to safety program enforcement and implementation process.

The employers were asked whether the safety programs and services they implemented or provided to employees were enforced. Forty-six (46) employers selected “Yes” the safety program was enforced, while one employer selected “No”.

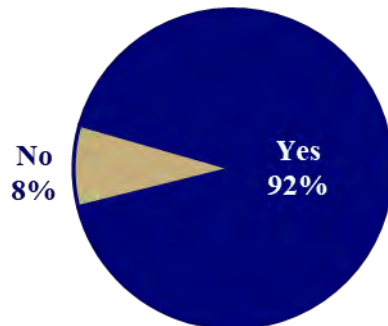
Are the safety programs and services selected above enforced?



Forty-seven employers selected “Yes” and one employer selected “No”.

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Are the safety program principles or mission statement posted in a conspicuous place(s) at the worksite?



Forty-four employers selected “Yes” and four employers selected “No”.

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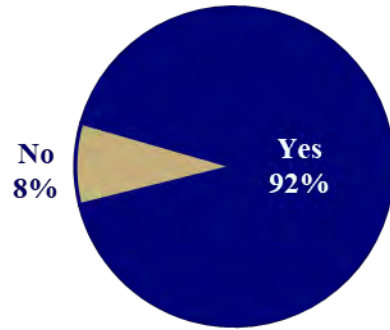
Does senior management meet at least once annually to review the safety program to ensure the program is effective, sustainable and continually improving?



All 48 employers confirmed that senior management meets at least annually for reviews.

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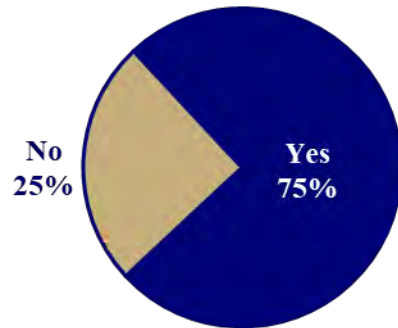
Is safety compliance a performance review measure for management and/or employees?



Forty-four employers selected “Yes” and four selected “No”.

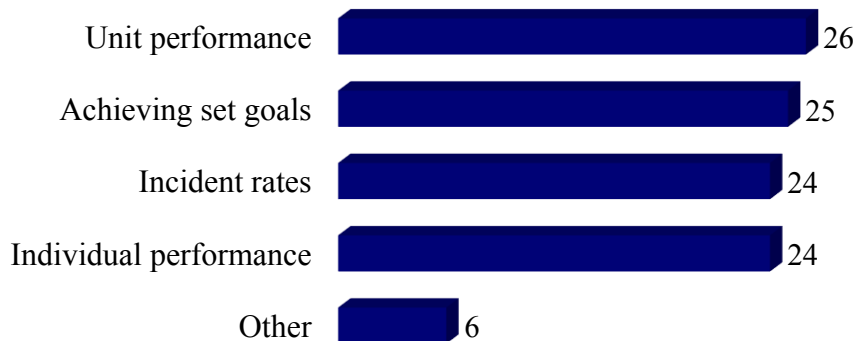
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Do you utilize a safety incentive program for management and/or employees?



Thirty-six employers selected “Yes” and 12 selected “No”.

Of the 36 employers who selected “Yes”, a follow-up question was posed to identify options included in company incentive programs.

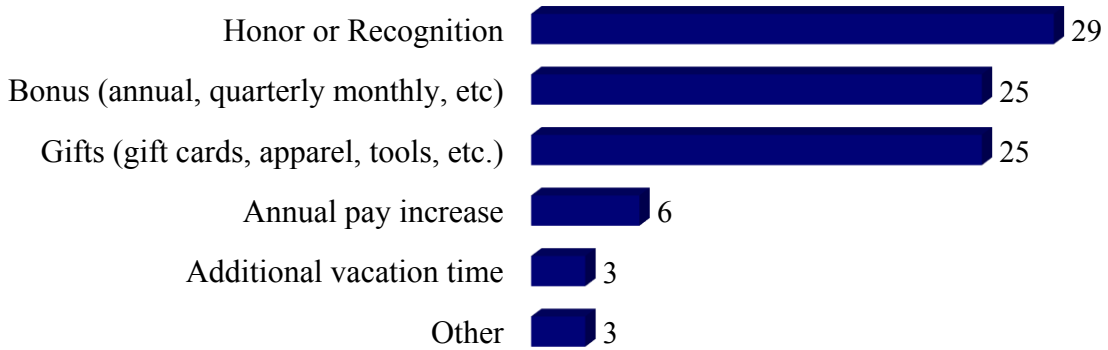


The options above were pre-set options that an employer marked if applicable. If “Other” was selected, the comments below were provided by employers as additional options relating to company safety incentive program criteria.

- Supporting Safety Program Initiatives
- Proactive safety initiatives
- Financial incentives

- Top safety observations turned in for the month are given a gift card to recognize them along with an email that is sent to the workforce with the safety observations for the month.
- Stop, Call and Wait recognition - Gift Cards Annual Safety bonus tied to KPI of CHIPS acronym (Stop, Look and Point at intersections for safe walking behavior on campus)
- Financial incentives are NOT tied to lagging metrics like RIR. Safety is included in performance management plans which impact bonuses and raises. Company policy prohibits incentives that are tied to lagging indicators.

An additional follow-up question was posed to the 36 employers that selected “Yes” for the safety incentive program question to further narrow down incentives specifically used to incentivize employees for safety program compliance.

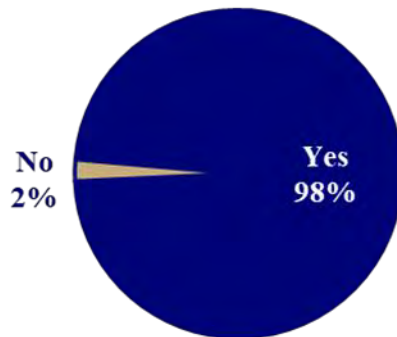


The options above were pre-set options that an employer marked if applicable. If “Other” was selected, the comments below were provided by employers as additional options used to incentivize employees for safety program compliance.

- Supporting Safety Program initiatives
- We provide "Lunch and Learn" twice a year for employees.
- The recognition is for the hospital not individual employees and they receive a portion of their insurance premium returned to them if they reach certain goals.

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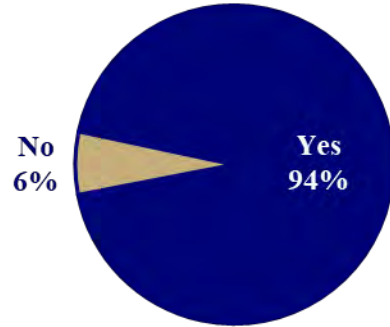
Do you have a progressive discipline policy in place to address safety program violations?



Forty-seven employers selected “Yes” and one employer selected “No”.

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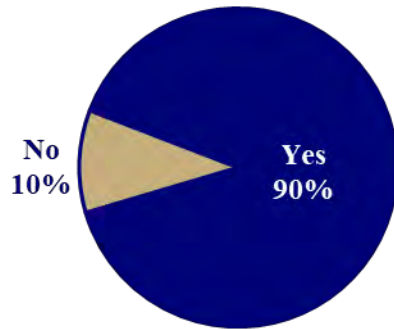
Do you have a workplace safety committee which meets regularly?



Forty-five employers selected “Yes” and three employers selected “No”.

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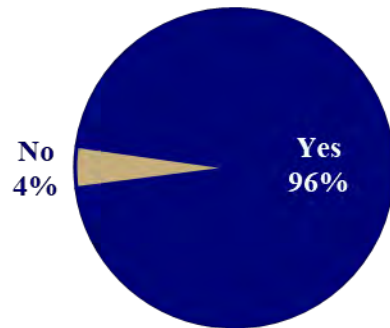
Do you have at least one full time employee dedicated solely to the safety program oversight and implementation?



Forty-three employers selected “Yes” and five employers selected “No”.

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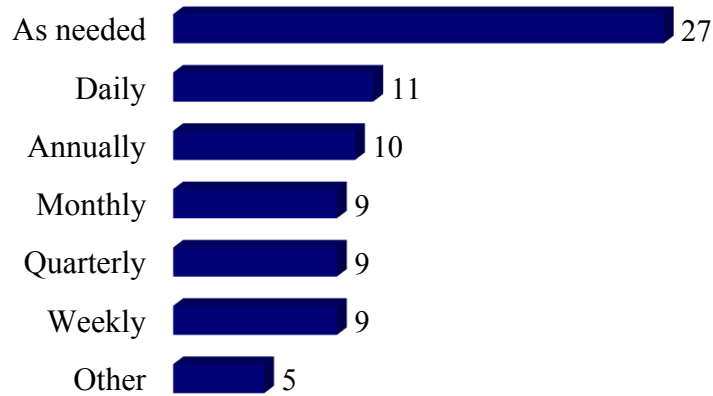
Has a safety survey been completed for each work area and evaluated for occupational safety?



Forty-six employers selected “Yes” and two employers selected “No”.

Several additional questions were asked based on an employer’s response to the above question. If an employer responded “Yes”, they were asked to provide the following supplemental information. The following analysis is based on the 46 employers who affirmatively answered the safety survey for each work area question.

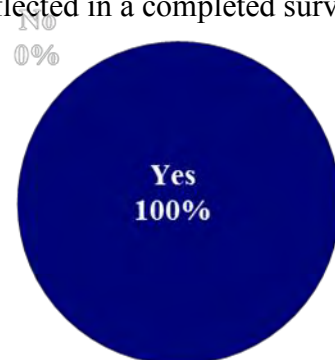
If you answered "Yes" to the question above, how often are safety surveys conducted and/or updated?



The options in the graphic were pre-set options that an employer marked if applicable. The following additional comments were provided by employers that chose "Other" in the question above relating to the frequency of safety surveys.

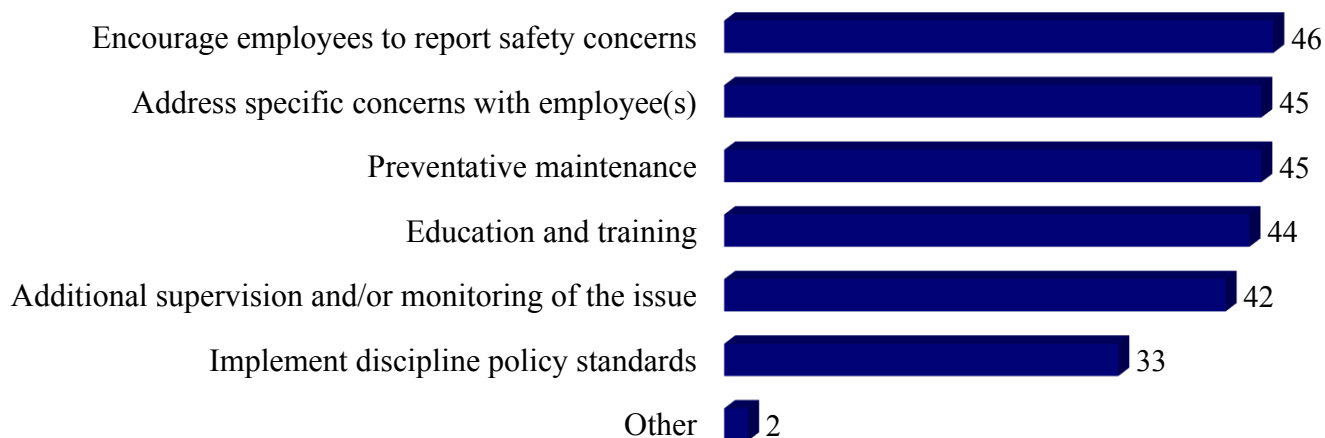
- Depends on type of survey and location
- Different timelines dependent on type.
- Every four months an outside vendor performs a workplace safety audit
- ASAP Inspections, GEMBA Walks, EHS Committee Walks - multiple ways of auditing areas (Daily, Weekly, Monthly, Annually). Risk Assessments done by area annually as well.
- Each facility is evaluated and re-evaluated with any re-configurations for facility based hazards. Each position is evaluated for hazards and common issues related to each jobcode (position). Training is provided that includes both the position and facility hazards as well as general safe work methods.

If you answered "Yes" to the completed safety survey question above; do you have a protocol to address any safety or loss issues reflected in a completed survey?



All 46 employers confirmed they do have protocols in place to address safety and loss issues reflected in a safety survey.

When asked to select protocols used to address safety concerns resulting from a survey the following responses were received:



The two “Other” comments were:

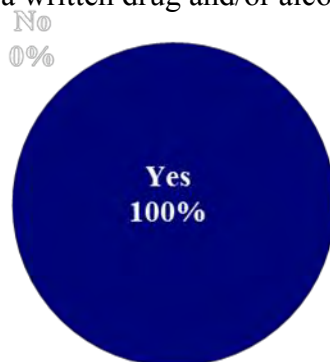
- Enter findings in Risk Assessment and track CAP to completion
- Escalate workplace safety survey findings with appropriate corporate and field cross-functional departments to resolve findings. Encourage employees to report safety concerns; Education and training; Additional supervision and/or monitoring of the issue; Preventative maintenance; Address specific concerns with the employee(s); Implement discipline policy standards

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### Substance Abuse Programs

This section of the survey captures implementation protocols and measures the effectiveness of drug and/or alcohol programs.

Do you have a written drug and/or alcohol program?

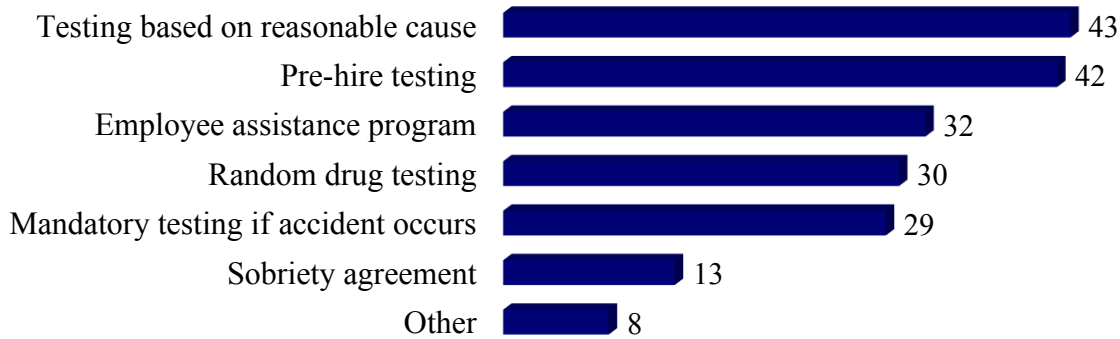


All 48 employers selected “Yes”.

Of the 48 employers that selected “Yes” for the question above, 36 employers marked that the drug and/or alcohol program applied to testing for all company employees; 8 employers marked “No” and 4 employers did not make a selection for this follow-up question.

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When asked to select all policies included within a drug and/or alcohol program, the following responses were received:



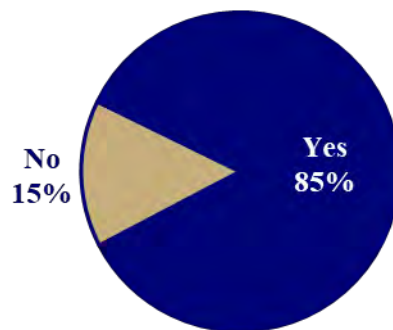
The options above were pre-set options that an employer marked if applicable. The following additional options were provided by employers that selected “Other” relating to the specific criteria or implementation procedures as part of the drug and/or alcohol program:

- Follow-up drug and/or alcohol testing
- Possible post-incident periodic/unscheduled on last chance agreement
- Testing if accident is caused by error in judgment or coordination.
- Pre-hire testing for all applicants. Random drug testing for covered positions (FAA and FMSCSA) and required post accident testing based on FMCSA standards. Reasonable cause testing (again in FMCSA) and policy. Employee Assistance program for all employees including self-reports.
- IAW DOT regulations

### Return to Work Programs

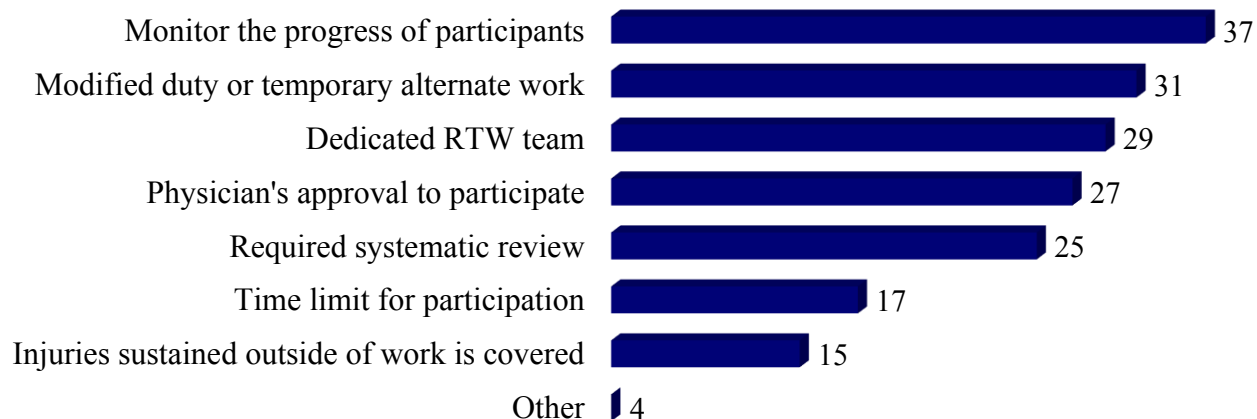
This section of the survey measures the implementation and effectiveness of Return to Work (RTW) programs.

Do you have a written Return to Work (RTW) program complete with an RTW manager at each facility?



Forty-one employers selected “Yes” and seven employers selected “No”.

The next question identifies criteria included in an RTW program. The options include:



The options above were pre-set options that an employer marked if applicable. The following additional options were provided by employers that selected “Other” relating to the specific criteria or implementation procedures as part of the return to work program:

- RTW without restrictions or with acceptable limitations.
- Injuries sustained outside of work engage with Leaves and Accommodations team to assist returning to work. Not RTW team. Time limit for participation is 120 days and can restart should claimant have surgery/hospitalization/major medical event, restarting the 120 days.
- This program is managed by our Internal Leave and Liability Team (workers comp/STD/LTD etc.) and third party administrator who manages these claims.
- RTW manager for every facility but not housed at every facility.

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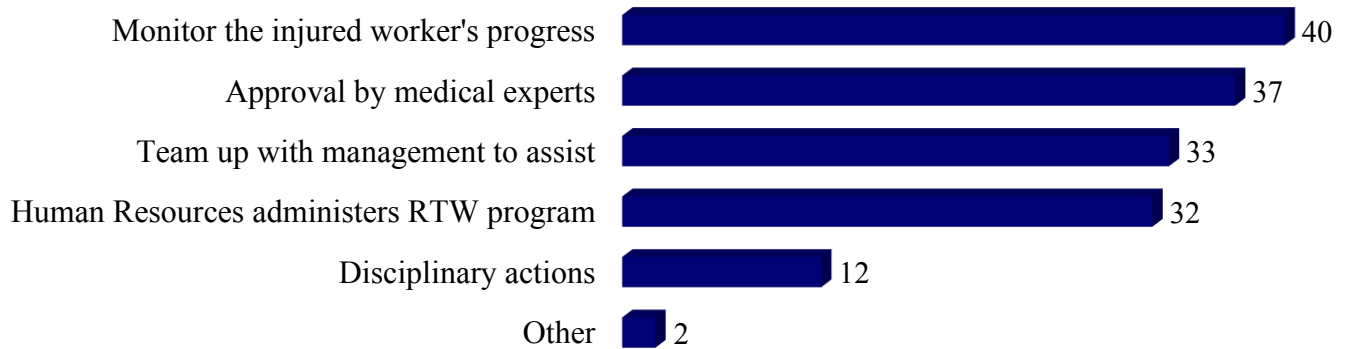
Is the written RTW program actively utilized by management and employees?



All 41 employers that answered the RTW question affirmatively, also responded “Yes” to this follow-up question.

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A follow-up question was asked to provide procedures in place to ensure the RTW program is effective. The following options were selected:

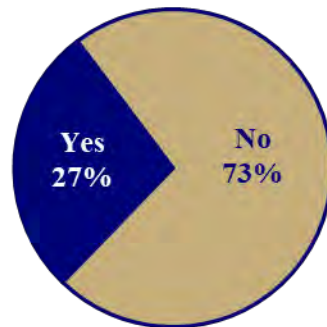


The options above were pre-set options that an employer marked if applicable. The following additional options were provided by employers that selected “Other” relating to the procedures in place for an effective return to work program:

- Managed by Leave and Liability Team - every claim.
- Home office administers the RTW program for work related injuries.

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Are there incentives to management and/or employees for reviewing and implementing the RTW program?



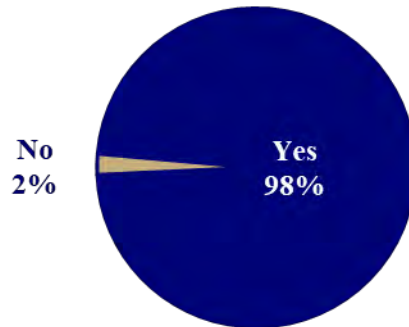
Eleven employers selected “Yes”, 29 employers selected “No” and 8 employers did not make a selection.

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## Workplace and Employee Training

This section of the survey is dedicated to workplace training provided, mandated or made available to new employees as well as re-training of employees for various reasons.

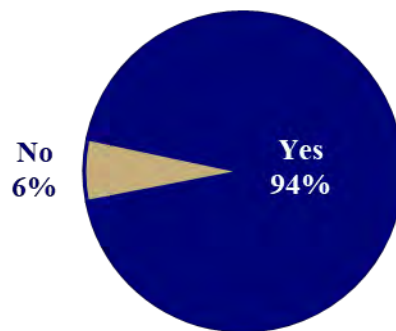
Do you provide initial training for employees and management participating in job activities involving potential workplace hazards?



Forty-seven employers selected “Yes” and one employer selected “No”.

A follow-up question was required for the 47 employers that confirmed they provide initial employee training that addressed potential workplace hazards.

If you answered "Yes" to the question above; does the initial training address all workplace hazards applicable to the industry?



Forty-four employers selected “Yes” and three employers selected “No”.

---

The following questions are related to initial training practices and protocols used in the employer's workplace.

Is all training mandatory for employees and/or management?



All 48 employers selected "Yes".

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Do you use a developed training curriculum and related materials?

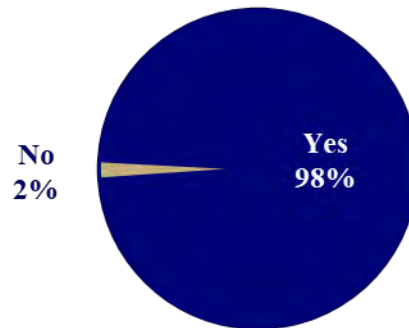


All 48 employers selected "Yes".

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The following questions focus on re-training options.

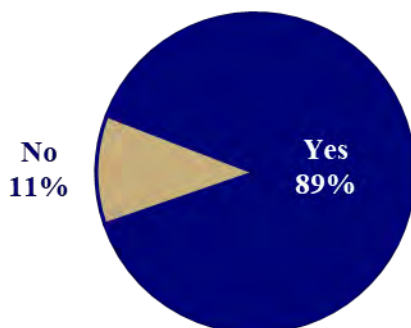
Do you provide re-training for employees and/or management?



Forty-seven employers selected "Yes" and one employer selected "No".

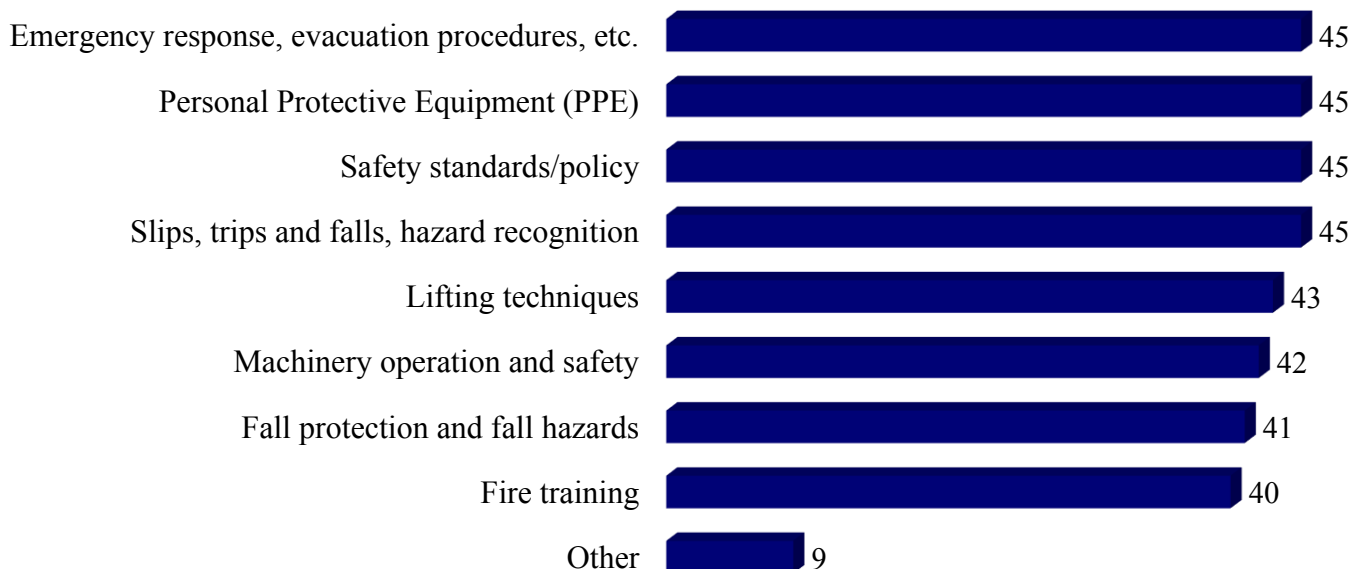
A follow-up question was required for the 47 employers who confirmed that re-training was provided to employees and management. Employers were asked if the re-training addressed all workplace hazards applicable to their industry.

Does re-training address all workplace hazards applicable to the industry?



Forty-one employers selected “Yes”, 5 employers selected “No” and one employer did not make a selection.

Employers were asked to select all hazards that company training or re-training addressed. The selected options included:



The options above were pre-set options that an employer marked if applicable. The following additional options were provided by employers that selected “Other” relating to industry hazards addressed in company training:

- Hazard Communications Ergonomics Control of Hazardous Energy Forklift and Pedestrian Safety Confined Space Hearing Loss Prevention Respiratory Protection Electrical Safety
- Comprehensive safety program related to the work environment

- Bloodborne Pathogens, Lock out, Forklift safety, Hazard communication, Harassment, FSC
  - Bloodborne pathogens; pre/post trip inspection; distracted driving
  - Any topic with required training could be part of the re-training (e.g., incident reporting, respiratory protection, LOTO, powered industrial trucks, etc.)
  - Crane, mobile equipment, electrical safety, working at heights, rail safety, etc.
  - Energy isolation, hazard communication, industrial hygiene awareness, hot work, lifting & rigging, critical device bypass, line of fire, emergency response, excavation & trenching, fire protection & prevention, electrical safety, motor vehicle safety, work authorization, driving, etc.
  - Training goes according to annual training calendar plus retraining when there is an incident or required as part of a corrective action plan. Retraining would be on specific area and hazard affected. Example - a forklift operator hits another forklift causing an injury. The operator who struck the other would have to undergo PIT operator retraining.
  - We train and re-train on all areas of Safety applicable to the facility and the position, not all hazards applicable to the industry. For example, we train an aircraft mechanic on different hazards than we train a handler in a local station since they have different hazards in their facility and jobs. Fire training, we train to call 911 and evacuate (life safety only). Although all employees are advised on the location of the well marked fire extinguishers, we train only to life safety. Fall protection training is covered if appropriate for the job position.
- 

### Workplace Information

The final section of the self-insured employer survey includes questions regarding workplace safety such as the use of personal protective equipment, workplace hazards, emergency preparedness and other industry information.

Do you provide appropriate personal protection equipment (PPE) to employees who have the potential for exposure to a workplace hazard?



All 48 employers selected “Yes”.

---

Do you provide regular inspection by management to ensure PPE is being used correctly?



All 48 employers selected "Yes".

---

Do you provide access and egress to the facility including proper emergency lighting?



All 48 employers selected "Yes".

---

Do you have a system in place for regular inspection by management to ensure the access, egress and lighting is properly maintained?



All 48 employers selected "Yes".

---

Are machines (including office equipment) regularly inspected, guarded, maintained and operated?



All 48 employers selected "Yes".

---

Do you have a program in place to address emergency preparedness?



All 48 employers selected "Yes".

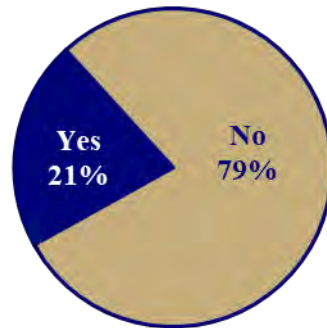
The 48 employers that responded affirmatively were asked to select all options involved in an emergency preparedness plan. The selected options included:



The options above were pre-set options that an employer marked if applicable. The following additional options were provided by employers that selected “Other” relating to emergency preparedness plans:

- Regional Response Team available to deploy, if needed.
  - Emergency Plan App on company devices for every site that details on needed info so that accessible in any emergency.
  - Dedicated unit vs external partnerships are distinct to each facility and are part of that facility's emergency plan.
- 

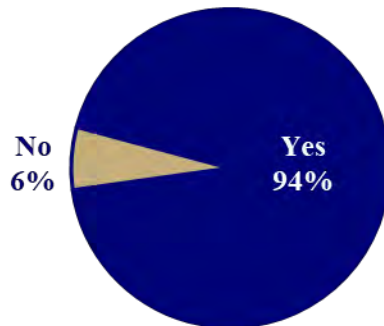
Are you certified by an international standards organization?



Ten employers selected “Yes” and 38 employers selected “No”.

---

Do you undergo regular internal and/or external safety audits?



Forty-five employers selected “Yes” and 3 employers selected “No”.

---

Additional comments provided by employers relating to any topic or question included in the survey:

- Wendy's International LLC: Our safety culture is continuously improving in partnership with senior leadership partners in operations. Wendy's employs a dedicated EHS team integrated into our risk management function. Our safety programs are built around OSHA compliance and safety awareness, as well as education and training for our valued employees.
  - JELD-WEN Inc.: We have a well-developed, comprehensive safety management system in place at each location.
  - Huntington Bancshares Incorporated: The Environmental Health and Safety Manager, along with his staff, conduct annual audits of large buildings.
  - Weyerhaeuser Company: Sutton OSB facility is OSHA VPP
  - Wheeling Park Commission: Safety is a high priority with Wheeling Park Commission. Trainings are in-house, and on-line and we work with our local medical emergency, fire department, community college, etc. for trainings and inspections.
  - City of Wheeling: We are looking for a training manager so that we can ensure that all facets of protection are fully observed.
-

## Self-Insured Employer Conclusions

The compilation and analysis of the self-insured employer responses concluded that most West Virginia self-insured employers have implemented and actively enforce safety programs and procedures in the workplace.

Nine industry types were represented with the highest percentages of employee count (28%) and the highest percentage of payroll (33%) reported in the transportation industry. Transportation includes communications, electric, gas and/or sanitary services.

Employers reported that the main components of safety programs and initiatives include:

- Clearly states standards and procedures; 100%
- Emphasizes a commitment and responsibilities; 100%
- Personal Protection Equipment; 100%
- Provides safety training; 100%
- Promotes a safety culture; 97.9%
- Accident investigation and follow-up reports; 95.7%
- Accident prevention; 93.6%
- Establishes a safety committee; 91.5%

98% of employers responded that all safety and loss programs or procedures are enforced and monitored on a regular basis with 90% reporting that at least one employee is solely dedicated to the oversight and implementation of the safety program.

A comprehensive review of the submitted responses would indicate that self-insured employers are using safety programs and initiatives in an effective manner to reduce workplace injuries and to provide employees with a hazard free environment while lowering company claim costs.

## Exhibits Index

**Exhibit 1** – 2024 West Virginia Safety Initiatives in the Workers' Compensation Market Insurer Survey

[https://www.wvinsurance.gov/insurer\\_safety\\_survey](https://www.wvinsurance.gov/insurer_safety_survey)

**Exhibit 2** – 2024 West Virginia Safety Initiatives in the Workers' Compensation Market Self-Insured Employer Survey

[https://www.wvinsurance.gov/Self-Insured\\_Safety\\_Survey](https://www.wvinsurance.gov/Self-Insured_Safety_Survey)

**Exhibit 3** – Insurer Groups and Companies

**Exhibit 4** – Self-Insured Employers with Industry Type

Exhibit 1



**2024 West Virginia Safety Initiatives in the Workers' Compensation Market Insurer Survey**

Pursuant to W.Va. Code §23-2C-5(c)(6), this form will serve as a mandatory survey to provide an overview of the safety initiatives currently being utilized by insurers in the West Virginia workers' compensation market.

Please contact Juanita Wimmer at Juanita.D.Wimmer@wv.gov or via telephone at 304-414-8491 with questions or concerns about specific questions or the online form in general.

NAIC Group Code

Company Name and NAIC Company Code\* If multiple companies, please list each name separately.

Company Address\* If multiple companies, please provide only one address.

Respondent Name

# Exhibit 1

Respondent Phone Number

Respondent Email Address

WV Policy Count - CY2023 Year End

WV Total Written Premium - CY2023 Year End

Do you offer safety and loss programs, or risk management services to WV employers?

Yes  No

Please check all types of safety programs and initiatives you offer. Multiple selections are accepted.

- On-site surveys or follow-up recommendations
- Loss analysis
- Education and training resources
- Safety / Risk assessments
- Ergonomic evaluations
- Online safety programs or videos
- Development of policy and programs
- Industrial hygiene assessments
- Other

If "Other" was selected, then please provide additional information here.

---

Do you offer the services of a dedicated safety unit to WV employers?

Yes  No

If you answered "Yes" to the question above, please describe the services offered and approximate number of staff dedicated to WV employers for these services.

## Exhibit 1

Do you offer regular safety audits to WV employers?

Yes  No

If you answered "Yes" to the question above, please answer whether the information obtained from the safety audits is used in the schedule rating credit/debit consideration.

Yes  No

How many WV employers utilize the safety and loss programs and initiatives offered by you? (i.e., the count of WV policies utilizing any of the safety services you offer)

Of those WV employers that utilize the safety services that you provided in the previous question, please provide the premium amount for only those employers.

Please describe the most utilized safety programs or options by WV employers and provide an approximate count of employer utilization for each program or option.

Do you implement follow-up measures to ensure employer utilization of the offered safety services is effective and appropriate?

Yes  No

If you answered "Yes" to the question above, please provide quantitative metrics used to measure utilization success.

---

If an employer implements a drug and/or alcohol testing program in the workplace, do you consider that in the premium determination process?

Yes  No

If you answered "No" to the question above, please provide how you monitor employer implemented drug/alcohol testing programs.

## Exhibit 1

If you answered "Yes" to the question above, what aspects of a drug and/or alcohol testing program would you consider for a premium credit?

- Existence of drug / alcohol testing programs
- Utilization and adherence of the drug/alcohol program
- Effectiveness of drug/alcohol program
- Other

If "Other" was selected, then please provide additional information here.



Generally speaking, how do you feel WV employers compare to employers in other states regarding the effective use of safety and loss programs and initiatives?

- Better
- Same
- Worse

Please provide any suggestions of what the state of West Virginia could do to encourage employers to implement safety and loss programs, and initiatives.



## Exhibit 1

Please mark all options below that are most commonly used in your safety and loss programs.

- Online safety resources such as webinars, videos, video chat, etc.
- On-site safety consultations/audits/inspections
- Surveys or assessments
- Safety programs such as Stretch and Flex or other fitness-based routines
- Loss control analysis
- Return-to-Work programs
- Online training/seminars
- Compliance support/resources
- Toolbox safety talks
- Customized safety programs
- Accident investigation training
- Workers' compensation general training
- Safety Committee
- Self-inspection checklists
- Awareness programs (posters, booklets, stickers, etc.)
- Professional development for management
- Annual refresher training based on job function
- Other

If "Other" was selected, then please provide additional programs offered by your company to WV employers.



Please use this section to provide any additional comments relating to this safety survey. Comments may be general in nature or specific to any of the questions included within the survey or related to the distribution and format of the survey.



Exhibit 2



**2024 West Virginia Safety Initiatives in the Workers' Compensation Market  
Self-Insured Employer Survey**

Pursuant to W.Va. Code §23-2C-5(c)(6), this form will serve as a mandatory survey to provide an overview of the safety initiatives currently being utilized by self-insured employers. All self-insured employers are required to respond.

Please contact Juanita Wimmer at [Juanita.D.Wimmer@wv.gov](mailto:Juanita.D.Wimmer@wv.gov) or via telephone at 304-414-8491 with questions or concerns regarding the survey questions or the online survey form.

Employer Name

Employer Address \* If multiple locations, please provide the corporate headquarters mailing address.

Employer Contact Name

Employer Contact Phone Number

Employer Contact Email Address

## Exhibit 2

### Primary Industry

- Agriculture
- Construction
- Finance, Insurance and/or Real Estate
- Healthcare
- Manufacturing
- Mining
- Public Administration
- Retail Trade
- Services - Hotel, Lodging, Health Recreation, Education, Legal, Restaurant, Social Services, etc.
- Transportation, Communications, Electric, Gas and/or Sanitary
- Wholesale Trade

### Count of WV employees

### Approximate 2023 calendar year annual WV payroll

Do you have a written safety and loss program for your employees, including provisions for any particular problems associated with your business (such as dust or noise)?

- Yes  No

If you answered "Yes" to the question above, please check all components that your safety program addresses.

- Provides safety training
- Personal Protection Equipment
- Promotes a safety culture
- Emphasizes a commitment and responsibilities
- Accident prevention
- Accident investigation and follow-up reports
- Establishes a safety committee
- Clearly states standards and procedures
- Other

## Exhibit 2

If "Other" was selected, then please provide additional components of your safety program here.



Is the safety program enforced?

Yes  No

Are the safety program principles or mission statement posted in a conspicuous place(s) at the worksite?

Yes  No

Does senior management meet at least once annually to discuss and review the safety program, to ensure it is effective, sustainable and continually improving?

Yes  No

Is safety compliance a performance review measure for management and/or employees?

Yes  No

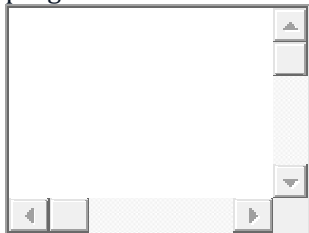
Do you utilize a safety incentive program for management and/or employees?

Yes  No

If you answered "Yes" to the question above, please select any options below that are included within the safety incentive program.

- Achieving set goals
- Unit performance
- Individual performance
- Incident rates
- Other

If "Other" was selected, then please provide additional options included in the safety incentive program.



## Exhibit 2

If you answered "Yes" to the safety incentive question, please select any options below that are awarded to employees for safety program compliance.

- Bonus (annual, quarterly monthly, etc.)
- Annual pay increase
- Honor or Recognition
- Additional vacation time
- Gifts (gift cards, apparel, tools, etc.)
- Other

If "Other" was selected, then please provide additional awards or honors provided to compliant employees as part of the safety incentive program.



Do you have a progressive discipline policy in place to address safety program violations?

- Yes  No

Do you have a workplace safety committee that meets regularly?

- Yes  No

Do you have at least one full time employee, dedicated solely to the safety program oversight and implementation?

- Yes  No

Has a safety survey been completed for each work area, and evaluated for occupational safety?

- Yes  No

If you answered "Yes" to the question above, how often are safety surveys conducted and/or updated?

- Annually
- Quarterly
- Monthly
- Weekly
- Daily
- As needed
- Other

## Exhibit 2

If "Other" was selected, then please provide additional information below.



If you answered "Yes" to the completed safety survey question above, do you have a protocol to address any safety or loss issues reflected in a completed survey?

Yes  No

If you answered "Yes" to the question above, please select applicable protocols used to address safety concerns as a result of completed safety surveys.

- Encourage employees to report safety concerns
- Education and training
- Additional supervision and/or monitoring of the issue
- Preventative maintenance
- Address specific concerns with employee(s)
- Implement discipline policy standards
- Other

If "Other" was selected, then please provide additional protocol information here.



Do you have a written drug and/or alcohol program?

Yes  No

If you answered "Yes" to the question above, does the program include testing for all employees?

Yes  No

## Exhibit 2

Please select all options applicable to the drug and/or alcohol program.

- Pre-hire testing
- Testing based on reasonable cause and/or suspect
- Employee assistance program
- Random drug testing
- Sobriety agreement
- Mandatory testing if accident occurs
- Other

If "Other" was selected, then please provide additional options applicable to the drug and/or alcohol program below.




Do you have a written Return-to-Work (RTW) program complete with a RTW manager at each facility?

- Yes  No

If you answered "Yes" to the question above, please select options that are included within your RTW program.

- Modified duty or temporary alternate work
- Physician's approval to participate in the program
- Monitor the progress of participants
- Required systematic review
- Injuries sustained outside of work is covered under the program
- Dedicated RTW team
- Time limit for participation
- Other

If "Other" was selected, then please provide additional options that are included in your RTW program.



## Exhibit 2

Is the written RTW program actively utilized by management and employees?

Yes  No

Please select all procedures that are in place to ensure the RTW program is utilized.

- Human Resources administers the RTW program
- Monitor the injured worker's progress
- Approval by medical experts to determine further procedures
- Team up with different units and management to assist the injured worker
- Disciplinary actions
- Other

If "Other" was selected, then please provide additional procedures that are in place to ensure the RTW program is utilized.



Are there incentives to management and/or employees for reviewing and implementing the RTW program?

Yes  No

Do you provide initial training for employees and management participating in job activities involving potential workplace hazards?

Yes  No

If you answered "Yes" to the question above, does the initial training address all workplace hazards applicable to the industry?

Yes  No

Is safety training mandatory for employees and/or management?

Yes  No

Do you use a developed safety training curriculum and related materials?

Yes  No

Do you provide re-training for employees and/or management?

Yes  No

Does re-training address all workplace hazards applicable to the industry?

Yes  No

## Exhibit 2

Please select the hazards that are addressed in re-training.

- Personal Protective Equipment (PPE)
- Safety standards/policy
- Emergency response, evacuation procedures, etc.
- Slips, trips and falls, hazard recognition
- Fall protection and fall hazards
- Lifting techniques
- Fire training
- Machinery operation and safety
- Other

If "Other" was selected, then please provide additional hazards or areas of focus involved in re-training.



Do you provide appropriate personal protection equipment (PPE) to employees who have the potential for exposure to a workplace hazard?

Yes  No

Do you provide regular inspection by management to ensure PPE is being used correctly?

Yes  No

Do you provide appropriate access and egress to the facility including proper emergency lighting?

Yes  No

Do you have a system in place for regular inspection by management to ensure the access, egress, and lighting is properly maintained?

Yes  No

Are machines (including office equipment) regularly inspected, guarded, maintained and operated?

Yes  No

Do you have a program in place to address emergency preparedness?

Yes  No

## Exhibit 2

If you answered "Yes" to the question above, please select all options relating to your emergency preparedness plan.

- Emergency and evacuation plans are posted at worksites and are easily accessible by employees
- Written policy with clear and concise procedures
- Alarm systems are in place to alert employees
- Mandatory training and drills are performed
- Existence of a dedicated unit to handle emergencies
- External partnerships
- Other

If you selected "Other" on the question above, please provide additional options relating to your emergency preparedness plan.



Are you certified by an international standards organization?

- Yes  No

Do you undergo regular internal and/or external safety audits?

- Yes  No

Please use this section to provide any additional comments relating to this safety survey. Comments may be general in nature or specific to any of the questions included within this survey.

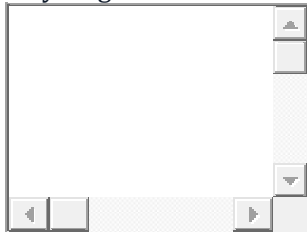


Exhibit 3

Group Name	Company Name(s)
Encova Mut Ins Grp	BrickStreet Mut Ins Co Northstone Ins Co Pinnaclepoint Ins Co Summitpoint Ins Co
Travelers Grp	Charter Oak Fire Ins Co Farmington Cas Co Phoenix Ins Co Standard Fire Ins Co Travelers Cas & Surety Co Travelers Cas Ins Co of Amer Travelers Ind Co Travelers Ind Co of Amer Travelers Ind Co of CT Travelers Prop Cas Co of Amer
Zurich Ins Grp	American Guar & Liab Ins American Zurich Ins Co Zurich Amer Ins Co Zurich Amer Ins Co of IL
Brookfield Reins Ltd Grp (formerly Agro Grp)	Argonaut Ins Co Argonaut Midwest Ins Co Rockwood Cas Ins Co United Farm Family Ins Co
Erie Ins Grp	Flagship City Ins Co Erie Ins Exch Erie Ins Prop & Cas Co Erie Ins Co of NY Erie Ins Co
Starr Grp	Starr Ind & Liab Co Starr Specialty Ins Co
Skyward Specialty Ins Grp	Imperium Ins Co

Exhibit 3

Group Name	Company Name(s)
Hartford Fire & Cas Grp	Hartford Accident & Ind Co Hartford Cas Ins Co Hartford Fire Ins Co Hartford Ins Co of IL Hartford Ins Co of The Midwest Hartford Ins Co of The Southeast Hartford Underwriters Ins Co Nutmeg Ins Co Property & Cas Ins Co of Hartford Sentinel Ins Co Ltd Trumbull Ins Co Twin City Fire Ins Co
Chubb Ltd Grp	Ace Amer Ins Co Ace Prop & Cas Ins Co Bankers Standard Ins Co Chubb Ind Ins Co Chubb Natl Ins Co Executive Risk Ind Inc Federal Ins Co Great Northern Ins Co Indemnity Ins Co of North Amer Pacific Employers Ins Co Pacific Ind Co Vigilant Ins Co Westchester Fire Ins Co
Liberty Mut Grp	American Fire & Cas Co Employers Ins Co of Wausau First Liberty Ins Corp Liberty Ins Corp Liberty Mut Fire Ins Co LM Ins Corp Milbank Ins Co Ohio Cas Ins Co Ohio Security Ins Co Plaza Ins Co State Auto Prop & Cas Ins Co State Automobile Mut Ins Co West Amer Ins Co

## Exhibit 4

Name: ACNR Resources, Inc.  
Industry: Mining

Name: CONSOL Pennsylvania Coal Company LLC  
Industry: Mining

Name: Alex Energy LLC  
Industry: Mining

Name: Cracker Barrel Old Country Store Inc.  
Industry: Services

Name: Alliance Coal LLC  
Industry: Mining

Name: Delhaize America LLC  
Industry: Retail Trade

Name: American Electric Power Company Inc.  
Industry: Transportation

Name: Dolgencorp LLC  
Industry: Retail Trade

Name: Aracoma Coal Company LLC  
Industry: Mining

Name: Eastern Gas Transmission  
Industry: Transportation

Name: Asplundh Tree Expert LLC  
Industry: Transportation

Name: Encompass Health Corporation  
Industry: Healthcare

Name: Brooks Run South Mining LLC  
Industry: Mining

Name: Exxon Mobil Corporation  
Industry: Transportation

Name: City of Fairmont  
Industry: Public Administration

Name: Federal Express Corporation  
Industry: Transportation

Name: City of Huntington  
Industry: Public Administration

Name: FedEx Ground Package System Inc.  
Industry: Transportation

Name: City of Parkersburg  
Industry: Public Administration

Name: Fiesta Tableware Company  
Industry: Manufacturing

Name: City of Wheeling  
Industry: Public Administration

Name: FirstEnergy Service Company  
Industry: Transportation

Name: Columbia West Virginia Corporation  
Industry: Manufacturing

Name: General Motors LLC  
Industry: Wholesale Trade

Name: CONSOL Mining Company LLC  
Industry: Mining

Name: Highland Mining Company  
Industry: Mining

## Exhibit 4

Name: Huntington Alloys Corporation  
Industry: Manufacturing

Name: SWVA Inc.  
Industry: Manufacturing

Name: Huntington Bancshares Inc.  
Industry: Finance

Name: T-Force Freight Inc.  
Industry: Transportation

Name: JELD-WEN Inc.  
Industry: Manufacturing

Name: Toyota Motor Manufacturing WV Inc.  
Industry: Manufacturing

Name: Kingston Mining Inc.  
Industry: Mining

Name: U S Silica Company  
Industry: Mining

Name: Lowes Home Centers LLC  
Industry: Retail Trade

Name: Union Carbide Corporation  
Industry: Manufacturing

Name: Marfork Coal Company LLC  
Industry: Mining

Name: United Parcel Service Inc.  
Industry: Transportation

Name: Monongahela Power Company  
Industry: Transportation

Name: Virginia Electric and Power Company  
Industry: Transportation

Name: Pepsi-Cola Metropolitan Bottling Co Inc.  
Industry: Manufacturing

Name: Wendy's International LLC  
Industry: Services

Name: Performance Coal Company LLC  
Industry: Mining

Name: West Virginia Counties Risk Pool Inc.  
Industry: Public Administration

Name: Pilgrim's Pride Corp Of West Virginia Inc  
Industry: Manufacturing

Name: Weyerhaeuser Company  
Industry: Manufacturing

Name: Potomac Edison Company  
Industry: Transportation

Name: Wheeling Park Commission  
Industry: Services

Name: Spartan Mining Company LLC  
Industry: Mining