



CNAM AID FOR OCCUPATIONAL RISK PREVENTION: UNPROVEN EFFECTIVENESS

FLASH AUDIT

March 2024

SUMMARY

To encourage small companies to take steps to prevent accidents in the workplace, commuting accidents and occupational illnesses, the French National Health Insurance Fund (CNAM) may award subsidies.

For companies with more than 150 employees, on the other hand, incentives are provided through the pricing of occupational accidents and diseases contributions, based on the workplace accident rate, i.e. the frequency and severity of incidents.

Two schemes coexist: customized prevention contracts supported by local funds, and "prevention subsidies for very small enterprises (VSE)", which are targeted and paid out on a one-stop basis. The cumulative amount of this aid reached €383.8 million over the 2019-2022 period.

In its thematic public report on public policies on occupational health prevention in companies, published in December 2022, the Court made an initial critical assessment of the subsidy scheme for very small enterprises. This flash audit, carried out in the context of a significant increase in resources made possible by the creation in 2023 of an investment fund for the prevention of occupational exhaustion, goes further in recommending a review of the scheme, which suffers, in particular, from a lack of targeting of aid and insufficient evaluation of its effectiveness.

Poorly-informed and insufficiently-targeted oversight

There have been very few assessments of the impact of prevention subsidies on the workplace accident rate. Moreover, the distribution of the budget between regions is not linked to local workplace accident rates. Finally, the distribution of subsidies between business sectors depends only partially on their workplace accident rate. It is the mobilization capacity of the players involved - companies applying for subsidies and professional federations capable of signing and promoting national agreements on objectives (*conventions nationales d'objectifs* - CNO) - and not the identification of the sectors with the greatest needs, that determines the allocation of subsidies.

“VSE prevention” subsidies: difficult to implement and with uncertain impact

“VSE prevention” subsidies are paid to companies with fewer than 50 employees according to demand, within the limits of a provisional national budget. This places constraints on their management, leading to their discontinuation if the budget is exhausted. Allocation conditions are defined in reference documents that are consolidated belatedly, several months after their effective date.

These subsidies finance work equipment, services and training that meet precise specifications. Their variable number, purpose and duration make them difficult for eligible companies to understand, contributing to a high rejection rate for grant applications.

Their budget is steadily increasing, despite the fact that their impact on the frequency and severity of occupational accidents and illnesses has yet to be demonstrated.

Pending their targeting towards sectors with a high workplace accident rate, and the development of a reliable method for assessing their impact, the Court recommends their suspension in favour of awareness-raising campaigns aimed at small businesses in sectors with a higher workplace accident rate.

Tightly supervised prevention contracts that need to be better evaluated

Prevention contracts are signed between a company with fewer than 200 employees and a local health insurance fund, with the aim of implementing a comprehensive occupational risk prevention action plan in an establishment. They must form part of a national agreement on objectives (CNO) defined by a joint body, the national technical committee of the sector.

The development of prevention contracts is therefore linked to the capacity for action of the professional federations and the human resources available in the health insurance funds. They are time-consuming to draw up, but easier to monitor as health insurance officers systematically visit sites to ensure the proper implementation of the contract. These prevention contracts help to reduce the frequency of workplace accidents in the beneficiary establishments, in a proportion that is not significantly different from those observed in companies as a whole.

An embryonic internal control system that needs to be strengthened

Control of the conditions under which prevention contracts and “VSE prevention” subsidies are awarded has long depended on the systems put in place by the local health insurance funds' authorising and accounting departments. The CNAM has only recently embarked on a coordinated approach to internal control and the fight against fraud, which needs to be strengthened.

The recent changes made to the conditions for the payment of “VSE prevention” subsidies (e.g. the requirement to produce a bank statement to certify the reality of the expenditure) would benefit from being supplemented. Photographs of the equipment in situ should be required, and the names of the suppliers of the equipment purchased should be entered in the computer application as a matter of course, in order to detect any de facto monopolies. Finally, on-site visits should be made compulsory, as was the case until 2019.

Main conclusions of the audit

According to the few studies carried out, the two financial incentive schemes studied do not make it possible to reduce the accident rate in small companies.

The development of coordinated actions, such as prevention contracts, which are based on the commitment of the social partners, calls for a high level of involvement on the part of the CNAM to reiterate the objectives pursued and to support their design and implementation.

An evaluation of the impact of these subsidies, which is virtually non-existent due to the methodological difficulties involved, is essential in deciding whether to withdraw, maintain or promote each scheme, and in adjusting the targets according to the size of the company or business sector. Finally, in addition to verifying that the correct implementation of the expenditure, controls are based on processes that are sometimes cumbersome and insufficiently conclusive.

They are limited to a search for proof of expenditure and evaluation of its impact, and suffer from a lack of monitoring of suppliers, which makes it impossible to identify de facto monopolies.

These major shortcomings are a cause for concern in the context of the creation of the FIPU¹ (investment fund for the prevention of occupational exhaustion), which is intended to provide an additional €150 million a year to finance prevention, awareness-raising, training and retraining initiatives for employees who are particularly exposed to ergonomic risk factors.

¹ Decree no. 2023-759 of 10 August 2023 on the fund for investment in the prevention of occupational exhaustion and the occupational risk prevention account.

Following on from an earlier recommendation², the Court calls on the CNAM to remedy the weaknesses of the current system and, if these financial incentives are to coexist with the FIPU, to take account of the observations made in this audit before the implementation of the latter, by targeting aid at the sectors with the highest workplace accident rates, developing a robust method for evaluating their effectiveness and implementing a strengthened internal control system covering, in particular, relations with suppliers of prevention devices.

² Court of Accounts, *Les politiques publiques de prévention en santé au travail dans les entreprises*, December 2022. One recommendation concerned the continuation of evaluation work to provide a robust assessment of the effectiveness of prevention programmes.

Single recommendation

Suspend “VSE prevention” subsidies until such time as they are targeted at the sectors with the highest workplace accident rates, a method for assessing their effectiveness is developed, and tighter internal controls are implemented, covering relations with equipment suppliers in particular.