

PAGODA ELECTRICAL ACCIDENT INVESTIGATION AND REPORTING PROGRAM

1. REQUIREMENTS AND PROCEDURES

- 1.1. Purpose** – To establish requirements and procedures to enable the company to fulfill statutory accident recording and reporting requirements, as well as enable the company to develop focused training programs for the purpose of reducing accidents, occupational injuries and occupational illnesses.

Accident Recording – All employees shall be instructed to immediately report every accident/injury that occurs at work to their supervisor, no matter how minor or incidental it may appear. All injuries, including first aid cases, must be documented. Even the slightest of injuries may cause serious infection or later complications

All cases must be documented internally whether they require only first aid or medical attention. Please designate the first aid cases as such. All other filings will assist in claims tracking and management procedures. Guidelines for Recording of OSHA Incidents are provided later in this document.

- 1.2.** Designated personnel shall investigate every accident when it occurs and shall complete the form “**Pagoda Electrical Accident Investigation Report**” (included in this section). Accident investigations should be fact finding in order to determine the cause of the accident and to establish preventive measures to be implemented to ensure that similar accidents do not happen in the future.
- 1.3.** All injuries must be reported to the job Foreman. The injured employee must also immediately contact the Pagoda Electrical Office to report the accident. The office representative will take all information necessary to complete the Pagoda Electrical Accident Investigation Report, as well as to report the incident to the Workers’ Compensation Insurance Carrier. The injured person will provide their name, what happened, type of injury, witnesses (if any), time of event, location accident occurred and whether or not they will require any medical treatment.
- 1.3.1.** If the employee requires medical treatment, they will be directed to the nearest Workers’ Compensation Panel of Physician’s provider. They will also be advised that a Post-Accident Drug and Alcohol Test must be conducted per the Company’s Substance Abuse Policy.
- 1.3.2.** The injured person will be informed that they must contact the Company office immediately following their medical treatment, so that further instruction can be provided. Failure to follow proper procedure may be grounds for disciplinary action.

1.4. Once an accident is reported to the Pagoda Electrical Office, the Safety Director, George Celia will be notified. A copy of the Accident Investigation Report will be provided to the Safety Director, who will then determine if a job site visit is necessary to further investigate the accident. In all situations, corrective actions are desired to prevent a recurrence of a similar accident.

1.5. Accident Reporting (Regulatory) – The company shall notify OSHA within eight hours of notification of all incidents involving:

- A. The death of an employee from a work-related incident.
- B. Fatal heart attacks occurring in the work environment.
- C. The in-patient hospitalization of three or more employees as a result of a single work-related incident.

- D. Upon determination that a reportable incident has occurred, the company shall also notify OSHA within eight hours of notification of any fatality or hospitalization, as described above, which occurs within 30 days of an incident.

- E. Notification shall be made by phone to the area office of OSHA that is nearest to the site of the reportable incident. Refer to Part IV, Introduction to OSHA for applicable telephone numbers.

- F. The following information shall be supplied to OSHA when reporting a fatality or hospitalization:
 - Name of the company.
 - Location of the incident.
 - Time of the incident.
 - Number of fatalities or hospitalized employees.
 - Names of any injured employees.
 - Name of the company contact person.
 - Phone number of the company contact person.
 - Brief description of the incident.

- G. All information supplied to OSHA shall be recorded and kept on file at the Company office. This information shall be retained for a period of five years.

1.6. Annual Survey Form

- A. Upon receipt of OSHA's "Annual Occupational Injuries and Illnesses Survey Form," the EXECUTIVE shall sign and return the completed form to OSHA within 30 calendar days, or by the date stated in the survey form, whichever is later.

2. GUIDELINES FOR RECORDING/REPORTING OF OSHA INCIDENTS

2.1. There are situations where an injury or illness occurs in the work environment and is not considered work-related. An injury or illness is work-related if, and only if, a work event or exposure is a discernible cause of the injury or illness, or of significant aggravation to a preexisting condition and no other OSHA mandated exception to work-relatedness applies. An employee's report of an injury or illness does not automatically establish the existence of an injury or illness for record keeping purposes, and a supervisor may refer the employee to a physician or other health care professional for evaluation, if uncertainty exists. An injury or illness occurring in the work environment that falls under one of the following exceptions is not work-related, and therefore is not recordable.

- A. At the time of the injury or illness, the employee was present in the work environment as a member of the general public rather than as an employee.
- B. The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
- C. The injury or illness results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, racquetball, or baseball.
- D. The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). **Note:** If the employee is made ill by ingesting food contaminated by workplace contaminants (such as lead), or gets food poisoning from food supplied by the employer, the case would be considered work-related.
- E. The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
- F. The injury or illness is solely the result of personal grooming, self-medication for a non-work-related condition, or is intentionally self-inflicted.
- G. The injury or illness is caused by a motor vehicle accident and occurs on a company parking lot or company access road while the employee is commuting to or from work.

- H. The illness is the common cold or flu. **Note:** Contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee becomes infected at work.
- I. The illness is a mental illness. Mental illness will not be considered work-related unless the employee voluntarily provides the employer with an opinion from a physician or other licensed health care professional with appropriate training and experience (psychiatrist, psychologist, psychiatric nurse practitioner, etc.) stating that the employee has a mental illness that is work-related.

2.2. First aid injuries are not recordable, provided there are no lost workdays, restricted work activity, or transfer because of the injury.

- A. The following is a complete list of all treatments considered first aid for 29 CFR § 1904 purposes. Treatment or procedures not included in the following list are considered medical treatment.
 - Using a non-prescription medication at non-prescription strength. For medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes.
 - Administering tetanus immunizations. Other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment.
 - Cleaning, flushing or soaking wounds on the surface of the skin.
 - Using wound coverings such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-Strips™. Other wound closing devices such as sutures, staples, etc., are considered medical treatment.
 - Using hot or cold therapy.
 - Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. Devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes.
 - Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.).
 - Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister.
 - Using eye patches.
 - Removing foreign bodies from the eye using only irrigation or a cotton swab.

- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means.
- Using finger guards.
- Using massages. Physical therapy or chiropractic treatment is considered medical treatment for recordkeeping purposes.
- Drinking fluids for relief of heat stress.

2.3. Medically treatment injuries are recordable. Medical treatment includes all medical procedures not listed above. Medical treatment does not include treatment that is considered to be first aid treatment, even if care was provided by a physician or a registered professional person.

2.4. Work-related injuries or illnesses are recordable, if they result in death, days away from work, restricted work, job transfer or a loss of consciousness.

- A. Injuries or illnesses resulting in a loss of consciousness are recordable, regardless of the length of time the employee remains *unconscious*.

2.5. Significant diagnosed work-related injuries or illnesses are recordable, even if they do not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

- A. Work-related cases involving cancer, chronic irreversible disease, a fractured or cracked bone, or a punctured eardrum shall be recorded under the general criteria at the time of diagnosis by a physician or other licensed health care professional.

2.6. Occupational hearing loss cases are recordable, if an employee's audiogram reveals a Standard Threshold Shift (STS).

- A. A Standard Threshold Shift (STS) is a change in hearing threshold, relative to the most recent audiogram for that employee, of an average of 25 decibels (dB) or more at 2000, 3000, and 4000 hertz in one or both ears.

2.7. Work-related needlestick injuries and cuts from sharp objects are recordable, if the objects are contaminated with another person's blood or other potentially infectious material.

- A. Cuts, lacerations, or scratches involving a clean object, or a contaminant other than blood or other potentially infectious material, are only recordable if the treatment is not included in the list of first aid treatments above and therefore, meets one or more of the medical treatment criteria.

2.8. Work-related musculoskeletal disorders are recordable.

- A. Work-related injuries and illnesses involving muscles, nerves, tendons, ligaments, joints, cartilage and spinal discs (musculoskeletal disorders or MSDs) shall be recorded in accordance with the requirements applicable to any injury or illness under 29 § 1904.
- B. Cases shall not be recorded as restricted work cases when the following three conditions are present.
 - An employee experiences minor musculoskeletal discomfort.
 - A health care professional determines that the employee is fully able to perform his/her job functions.
 - A supervisor assigns work restrictions to the employee to prevent a more serious condition from developing.

2.9. Oxygen Use

- A. Work-related cases shall be recorded when oxygen is administered to an employee who has been exposed to a substance and exhibits symptoms of an injury or illness.
- B. Work-related cases shall not automatically be recorded when oxygen is administered as a precautionary measure and where no symptoms have been exhibited. These cases shall only be recorded in accordance with the requirements applicable to any injury or illness under 29 § 1904.