1.0 Policy

All incidents arising out of Sunbelt Controls operations shall be properly investigated, reported and managed.

2.0 Purpose

To ensure employees receive necessary medical treatment and that all information related to all involved parties arising from work-related incidents is obtained and documented for use and analysis by regulatory agencies, insurance carriers, internal safety personnel and management for prevention of incident reoccurrence.

3.0 Scope

This applies to all incidents occurring in the course of and/or arising from work activities conducted by Sunbelt Controls employees or subcontractors.

4.0 Definitions

Accident, Incident – means any event that occurs during the performance of work activities that could have or did result in serious events, bodily injury, illness, or property damage.

First Aid Case – an occupational injury or illness where care received is not classified as medical treatment according to OSHA Record keeping guidelines.

Internal Insurance Contact – an Sunbelt Controls employee that has the responsibility for coordinating the filing and / or applicable management of claims

Medical Care – medical treatment other than noted under either Serious Event, as related to work activities.

Near Miss Incident – an event that could have resulted in serious event, bodily injury, bodily illness, or property damage.

OSHA Recordable Case, Medical Treatment Case – an occupational injury or illness requiring medical treatment beyond simple first aid as defined by OSHA Recordkeeping criteria. Common examples include intrusive procedures (i.e. stitches), prescribing medication, broken bones, loss of consciousness, restricted work activities, lost days from work, and fatalities.

Property Damage – Sunbelt Controls, public and all other work area property, including vehicles, damaged to such a nature that repair, replacement or restitution may be necessary.

Serious Events include:

- Injuries to three (3) or more employees from the same event
- Employee hospitalization for any reason
- Employee fatality
- Employee rescue provided by public services
- An inordinate amount of adverse publicity is expected due to incident
- A serious business interruption will result
- Other similar events

5.0 Requirements

5.1 General

Employees shall be trained, as part of the initial safety orientation, on the necessity and method to report all incidents immediately to their supervisor. Safety Manager shall be designated as "Internal Insurance Contacts".

Reporting and investigating incidents or events are secondary to employees receiving immediate care for occupational injuries and illnesses regardless of severity. Upon meeting immediate needs of the injured the reporting, investigative and claims management procedures apply.

Every work site shall identify in writing, as appropriate, preferred medical facilities for the treatment of injuries and illnesses, as allowed by state law, and post and/or communicate internally. A sample form is included within this section for use with evaluating prospective medical facilities (reference Appendix 33-A).

After-hours reporting and medical facilities arrangements shall be identified and communicated, as appropriate.

As preferred medical facilities are identified, the internal insurance contact shall furnish them with all applicable instructions on internal claims management practices, with an emphasis on the company's program for return to work/modified duty.

Notification, Investigation, Information Retention and Claims Management of Incidents (Serious and otherwise) shall proceed as noted within this section.

A Sunbelt Controls designee (preferably safety, supervision or management) shall accompany employees who need/seek initial off-site medical attention, regardless of the initial injury perception, for the entire duration of the initial treatment process.

Modified duty shall be utilized for employees temporarily disabled from workplace incidents (who are physically able) as noted within this section.

5.2 Notification for 'Serious Events'

The following key levels of notification shall occur immediately in the course of the reactive actions taken for the incident:

- Immediate supervisor of the employee and/or of applicable work area(s)
- Safety Manager and Site Safety Coordinator(s)
- Applicable Project / Department / Team Heads responsible for work area(s)
- President and Vice President of Operations
- Other Sunbelt Controls designees, as applicable
- Applicable Insurance Representatives by the internal insurance contact (reference – Claims Filing – sub-section 5.5.2 under Section 33 for further information)
- Applicable Regulatory Agencies (within time requirements and only by a representative designated by the President and applicable Safety Coordinator)

Only representatives designated by the President shall engage media representatives responding to Serious Events.

Only representatives designated by the President shall contact family members for Serious Events. In the case of an employee fatality, the President cannot delegate this responsibility down the chain of command.

5.3 Notification for Medical Treatment and Property Damage (other than during 'Serious Events')

The following levels of notification shall occur as soon as possible, but no later than shift end, in the course of the reactive actions taken:

- Immediate supervisor of the employee and/or of applicable work area(s)
- Safety Manager and/or Site Safety Coordinator
- Applicable project/department/team heads
- The Applicable Insurance Representative(s) – within 24-hours of the incident (reference sub-section [5.5.2]–Claims Filing–under section 33 of this manual), by the internal insurance contact

Supervisors are permitted to contact employee family members only if:

- Requested by the employee; and
- Incident is not a Serious Event

5.4 Accident / Incident Investigation

5.4.1 General

All initial investigations shall be immediately initiated by the direct supervisor and be completed by no later than 24-hours after the accident/incident occurred.

All completed documentation and statements obtained in the course of the investigation shall be provided to the Safety Manager and/or Site Safety Coordinator and internal insurance contact. HIPAA confidentiality laws regarding medical privacy shall be maintained.

All documented safety practices, applicable Risk Assessments, JSA's and task plans should be gathered and reviewed as part of any investigation.

5.4.2 Accident / Incident Investigation – Documentation

Investigation documentation will be noted on the Root Causation Analysis Form and the Incident Investigation Report (reference Appendix 33-B and Appendix 33-B1) or an equivalent investigation form approved by the Safety Department.

Securing and photographing the incident site may be necessary, depending upon the severity of the incident event.

A written statement from all involved parties is required. If written statements will not be provided by any involved party, oral statements can be transcribed / recorded. These individuals may include:

- Injured parties
- Witnesses
- Other third parties

5.4.3 Root Causation Analysis

A root causation analysis or an equivalent investigation form approved by the Safety Department shall be completed on every accident and/or incident (reference Appendix 33-B).

5.5 Claims Management

5.5.1 Paying Claims Internally

Prohibited for 'Other-than-First-Aid', medical treatments in California, as related to, employee work-related injuries.

Prohibited for certain types of work-related incidents regardless of the initial cost estimate, such as:

- Those felt to be 'questionable'
- Those involving lost time
- Soft and hard tissue back injuries
- Injuries involving joints of the body
- Any occupational illness
- Injuries involving chiropractic or physical therapy treatments past initial treatment
- Injuries where employee is referred to a specialist
- Injuries involving third parties (for example, public citizen/driver, other subcontractor's employee, etc.)

Using good judgment, incidents (minor employee injury and minor physical damage) estimated as less than $1,000 in cost can be paid internally by local operations.

Records of the incident and copies of payment shall be maintained (reference sub-section [5.5.6]–Claims Documentation for further information).

5.5.2 Claim Filing

Only internal insurance contacts are authorized to report claims to any insurance carrier.

All claims are to be reported to the respective insurance carrier within 24 hours of accident/incident knowledge, via:

- Established electronic methods
- Established phone methods
- Established fax methods

The internal insurance contact shall contact the designated adjuster to establish necessary reserves.

5.5.3 Modified Duty

Shall be provided for every employee returning to work from an occupational injury or illness where the employee's physical abilities are temporarily impaired.

Employees on Modified Duty shall be reasonably supervised.

Every incident involving Modified Duty shall be processed in the following manner:

- Restrictions and approved tasks shall be obtained from the treating physician (reference Appendix 33-C) then incorporated into a "Temporary Job Description" for the employee
- The "Temporary Job Description" is to be reviewed in detail with the employee and the assigned supervisor. Any special/necessary task instructions shall be provided directly to the employee at that time
- As initiated by the internal insurance contact, the assigned supervisor shall report weekly on the progress of the Modified Duty employee (reference Appendix 33-D and Appendix 33-D1). The internal insurance contact is to provide this information, regularly, to the designated insurance carrier adjuster and directly to the treating physician prior to **all** follow-up medical visits
- As physical restrictions change from follow-up visits, the process re-starts from the top of this list
- As possible, the internal insurance contact should obtain 'full release' statements and provide to the designated insurance carrier adjuster, as soon as possible
- Modified Duty employees cannot return to full duty until such a release is provided by the treating physician

5.5.4 Off-Work Employees

Contact with employees who are completely off-work due to an incident shall occur weekly, preferably by their direct supervisor.

Such weekly contact shall be documented and forwarded monthly to the Designated Internal Insurance Contact (see Appendix 33-D1).

The internal insurance contact shall provide this written information to the designated adjuster of the insurance carrier.

5.5.5 Claim Review

All open claims (reserve dollars present) shall be reviewed regularly by the internal insurance contact. A monthly review, at a minimum, is preferred.

5.5.6 Claim Documentation

Internal insurance contacts shall prepare and retain individual, fact-filled (only) claim files containing all applicable medical, investigation, follow-up documentation and communication.

Preferably, this information is to be maintained indefinitely, but no less than for thirty (30) years past the last date of employment of all employees involved.

5.6 OSHA Record Keeping

Reference Section thirty-four [34] OSHA Record Keeping of this Safety Policy & Procedures manual

6.0 References

State Compensation Insurance Fund
OSHA 29 CFR 1904 Recordkeeping Guidelines