



## PO-HS-144: Incident Response, Investigations, & Management

### Purpose:

1. The company is committed to predicting and preventing injuries, illnesses, and incidents; however, when incidents occur, proper management and response are critical.
2. This policy guides our incident management and response process and expectations, including employee care, initial reporting, investigation, root cause analysis, and corrective actions to prevent recurrence.

### Applies To:

1. This applies to all MPW and Porta Kleen (PK) employees and anyone working under our direction or supervision.
2. Customer specific policies must be followed in addition to this policy, with the more stringent taking precedent.

### Definitions:

1. **Department of Transportation (DOT) incident:** Citation or report of accident that resulted from a DOT inspection.
2. **DOT inspection report:** Completed on commercial vehicles with a gross weight of 10,001 pounds or more.
3. **First aid injury:** Accident in which medical attention consists of first aid treatment not normally requiring a medical professional to perform (e.g., scrapes, minor cuts, small burns, insect stings, etc.).
4. **Incident:** Event that causes, may result in, or may have caused (near miss) injury, illness, and/or property or environmental damage as well as events that cause customer response and/or government agency citation.
5. **Incident without injury:** Event occurred (e.g. person hit by object) without physical injury or property damage.
6. **Intelix:** Safety Management System to report incidents, track root causes and corrective actions, capture safety observations, and generate incident and trend reports.
7. **Intelix sub incident form:** Section requires investigator to enter specific data, based on the type of incident.
8. **Lost time injury:** Injured employee cannot return to work on next available workday, excluding day of accident.
9. **Medical treatment injury:** Incident results in professional medical care (e.g., prescriptions, sutures, fractures, serious burns, oxygen administration, wearing splints, etc.).
10. **Near miss incident:** Event does not cause injury or property damage due only to situation/conditions; includes events like dropped tools or equipment, unapproved equipment modifications, unaware pedestrians, etc.
11. **Personal illness:** Employee ailment during work hours or while on the grounds that is not work-related.
12. **Property damage incident:** Event that causes asset damage on private, including customer, property.
13. **Restricted work injury:** Injured employee is unable to perform all duties, requiring medical work restrictions.
14. **Root cause analysis:** Process to identify incident systemic cause(s) leading to sustainable corrective action(s).
15. **Serious injury:** Fatality, hospitalization (being admitted), loss of sight, and/or amputation.
16. **Spill and/or release incident:** Accidental leak or discharge of hazardous or harmful material (liquid, gas, or solid).
17. **Supervisor:** Refers generally to the person in charge of the work (e.g. Crew Leader) when an incident occurred.
18. **Vehicle incident:** Motor vehicle event on a public roadway resulting in injury and/or vehicle or property damage.
19. **Work related illness:** Ailment resulting from work exposure to a chemical, toxin, temperature, or other hazard.

### Roles/Responsibilities:

1. President and General Manager (GM): Responsible for resourcing and overseeing implementation of programs and policies. Responsible for initiating and serving on the company Crisis Response Team. Ensure operations and support functions comply with all federal reporting requirements and assign competent personnel to oversee

|                     |            |              |   |
|---------------------|------------|--------------|---|
| Effective Date:     | 02/22/1990 | Approved by: | Matt Dawson – Director, Safety & Training     |
| Last Reviewed Date: | 09/06/2023 | Author:      | Anthony Tagliaferro – Health & Safety Analyst |



## PO-HS-144: Incident Response, Investigations, & Management

incident investigations and hazard correction. Responsible for supporting investigations and communicating/verifying corrective actions across safety committees to employees and business leaders. Conduct or cause to be conducted audits and inspections.

2. Director, Safety & Training: Responsible for developing, implementing, and maintaining programs and policies that are properly resourced, accessible, and communicated at all levels. Provides guidance and field support to managers and supervisors. Responsible for training to ensure compliance with local, state, and federal guidelines. Ensures FROI reviews, investigator assignments, and incident investigation completeness. Coordinates initial incident reporting with federal agencies and supports customer reporting, ensures OSHA 300/301 logs are created and actioned, and ensures reviews in Intelex are complete and assigned a severity level. Coordinates Corporate and Executive Safety Reviews.
3. Manager and Supervisor: Responsible for preventing incidents, while being prepared to professionally communicate and immediately report all incidents, seek appropriate medical attention for injured employees in a timely manner, and preserving incident sites and equipment. Ensures all deficiencies are noted, root causes lead to corrective actions, and issues are corrected before work resumes after an incident. Conducts, follows up, and/or participates/cooperates with investigations and reviews, internal and external. Ensures employees are trained and communication is clear and direct, including support for Stop Work Authority and posting/communicating relevant information (including OSHA 300A logs).
4. Employee: Responsible for following all company and customer policies and procedures, including, but not limited to, safe work practices, hazard recognition, personal protective equipment usage, and incident reporting. Responsible for communicating workplace concerns with management and executing Stop Work Authority, as needed. Commit to not resuming work until deficiencies have been corrected and fully participating in and cooperating with all investigations.

### Policy:

1. Any employee who experiences a job-related injury, illness, vehicle incident, property damage incident, spill and release, Department of Transportation (DOT) inspection, or near miss incident while conducting company business, and are able to report and request assistance, must report the incident to their supervisor immediately.
  - a. If an employee witnesses a work-related incident that involves other employee(s) they should safely offer aid within their training and ability, including immediately reporting the incident to their supervisor if employees injured or directly involved are unable.
  - b. For more information on vehicle incidents refer to PR-HS-204.1 – Vehicle Accident Management.
2. Management (and response) timeline for an incident with injury:
  - a. Supervisors must prioritize and arrange immediate medical care for employees injured in an incident. If an injury occurs, care must be commensurate with the seriousness of the injury. Note: supervisors can be held accountable/liable for refusing or delaying medical care (see “Levels of Response” below).
  - b. Part of ensuring care for people is effective reporting to possibly affected people, medical professionals, emergency responders, and/or company, customer, and/or vendor managers (see “Reporting” below).
  - c. Supervisors ensure affected/possibly affected people are notified of incident hazards and made safe.
  - d. Supervisor arranges management support to ensure a responsible person attends to the injured person(s) while another management representative coordinates the incident scene and manages the response.
  - e. When possible, the direct supervisor should accompany the injured employee to medical care and delegate site and incident response to another management representative.

|                     |            |              |   |
|---------------------|------------|--------------|---|
| Effective Date:     | 02/22/1990 | Approved by: | Matt Dawson – Director, Safety & Training     |
| Last Reviewed Date: | 09/06/2023 | Author:      | Anthony Tagliaferro – Health & Safety Analyst |



## PO-HS-144: Incident Response, Investigations, & Management

- f. At the medical facility, the supervisor acts as an advocate for the injured employee, representing the employee if asked; keeping notes to support the employee’s care and follow up; working with local medical staff to ensure proper, prompt treatment; coordinating support from the company’s consulting physician; meeting the employee’s (and family) needs; etc.
  - g. If the injury is severe and requires the employee’s family be notified, Human Resources shall serve as the point of contact between the company and the employees listed emergency contact.
  - h. The supervisor or management representative remains with the injured employee until the medical provider releases the employee or until hospital admission is determined and implemented.
  - i. If an employee refuses medical care, refusal must be documented and the supervisor must verify fitness for duty with the company’s consulting physician. When in doubt, err on the side of employee health and safety.
  - j. Once people are safe/removed from hazards, a First Report of Incident (FROI) in Intelex and calls/meetings with managers/contacts with a need to know must occur within 15 or 30 minutes (see “Reporting” below).
  - k. If applicable, collect participant and witness statements as well as photos and videos of the incident scene.
  - l. Where required, safely secure equipment and incident scene for investigation; it is recommended that an incident diagram is created including distances and relevant facts (e.g. weather conditions, lighting, etc.).
  - m. Ensure those directly involved, witnesses, and others with expertise or relevant knowledge provide witness statements or their contact information for a future interview.
  - n. Post-incident substance screening must be handled in accordance with PO-HR-108 – Substance Screening and/or PO-HS-206 – DOT FMCSA Drug & Alcohol Testing to meet timelines and support root cause analysis.
    - i. If substance screening is required, test all employees whose conduct could have contributed to the incident.
    - ii. Do not upload substance screening results in the Intelex System (follow protocols and privacy requirements).
  - o. Supervisors ensure all deficiencies are corrected and applicable managers/investigators have released the site for work before continuing to perform tasks at the job site after an incident.
3. Levels of Response (there are three levels for tending to the health and welfare of an injured person):
- a. Immediate medical attention: supervisor contacts or ensures contact with 9-1-1 and/or local emergency responders for incidents that require or seem to require emergency medical attention and/or official transport. Note: in this event, management must attempt to reach the employee’s emergency contact.
  - b. Potential medical attention: contact MPW medical staff (consulting physician or occupational health nurse) for review, consult local medical staff if provided on the worksite, and/or transport to a medical provider. Note: for non-life-threatening injuries, occupational medicine facilities are preferred for medical care (see R&I-HS-144.2 Occupational Health Services Poster) over urgent and emergency room care.
  - c. First aid: contact MPW medical staff and/or local medical staff if provided on the worksite.
  - d. Note: when in doubt, err on the side of the injured person and consult/visit trained medical professionals.
4. Reporting:
- a. Serious incidents (fatality, hospitalization (being admitted), loss of sight, and/or amputation) must be reported to managers, General Managers, and the company president within fifteen (15) minutes; the Crisis Response Team may be activated depending on the severity (life-threatening) of the incident.
  - b. FROI in Intelex and calls/meetings with managers/contacts with a need to know within one (1) hour.
    - i. Any employee with access can submit a FROI in Intelex (see R&I-144.4: Incident Procedure Flow Chart).
    - ii. It is recommended the direct supervisor or manager complete the FROI.
    - iii. If Intelex system access is not available, report FROI details to management for entry.
  - c. A FROI includes the following:
    - i. Employee name.
    - ii. Customer or incident site (if customer does not exist in Intelex, select “other” and enter customer details).

|                     |            |              |   |
|---------------------|------------|--------------|---|
| Effective Date:     | 02/22/1990 | Approved by: | Matt Dawson – Director, Safety & Training     |
| Last Reviewed Date: | 09/06/2023 | Author:      | Anthony Tagliaferro – Health & Safety Analyst |



## PO-HS-144: Incident Response, Investigations, & Management

- iii. Date and time of occurrence.
- iv. Date and time employee began work.
- v. Incident description (see below).
- d. Incident descriptions in Intelx include the following:
  - i. Specific location of the incident (i.e. Rt. 22 West at mile marker 14, unit 2 lime slurry tank, etc.).
  - ii. What the employee was doing just before and/or at the moment when the incident occurred (i.e. Employee was sweeping the floor, employee was driving to the local warehouse, etc.).
  - iii. Nature of the incident (i.e. fall from ladder, contact with hot water, rear-ended another vehicle, etc.).
  - iv. Object or substance exposure that caused or had the potential to cause harm (i.e. hammer, lime dust, H<sup>2</sup>S, etc.).
  - v. Body part injured and injury type (i.e. left shin bruise, right index finger laceration, water-cut on left hand).  
Note: do not assume or diagnose; state known facts and use broad, common language until a medical diagnosis is available (e.g. FROI states “employee suffered burns on both legs below the knee” rather than “3<sup>rd</sup> degree burns to 35% of both legs” (unless supported by a medical diagnosis).
  - vi. Equipment number of the vehicle(s), trailers, etc. if the incident involves property damage or DOT citation.
- e. There are reporting responsibilities for external and federal organizations, like OSHA, requiring notification and reporting of serious incidents within a specified time frame (R&I-HS-144.3: Government Agency Reporting Timeline Guide).
  - i. The Safety and Training Department handles all initial incident reporting with federal or government agencies, while supporting operations in customer and vendor communications.
  - ii. Managers ensure applicable, factual information is quickly provided (in Intelx and/or directly) to the Safety and Training Department to ensure timely and accurate reporting.
- f. Reporting responsibilities for customers and vendors who require notification and/or reporting of incidents within a specified time frame must be coordinated and planned to ensure a clear, factual message.
  - i. Account, Site, Plant, and other Managers coordinate with senior managers and applicable executives/departments to ensure accurate, timely customer and vendor notification, where applicable.
  - ii. General Managers and Presidents approve all initial incident coordination with customers and vendors.
- g. Based on FROI Business Unit selected, a notification email will be sent to a predetermined distribution list.
- h. The Safety and Training team reviews submitted FROIs and, when needed, the MPW Case Manager assigns an investigator the investigator and management team will be notified via email.
- 5. Investigations:
  - a. Incidents including but not limited to injury, vehicle incident, property damage, government inspection (DOT, OSHA, MSHA, etc.) resulting in citation, near miss, and/or spill and release, must be thoroughly investigated.
  - b. All findings must include root cause(s) and corrective actions/preventative measures.
  - c. External investigators (e.g. OSHA) must receive cooperation and support. Management must accompany external investigators whenever possible, noting what is reviewed, said, photographed, and collected.
  - d. Company/internal investigations and investigators are the policy focus; investigators will be assigned and offered support. Company investigators are expected to request help from and respond to management and corporate when conducting incident investigations. Investigators can request support from Health & Safety personnel at all levels, subject matter experts (e.g. Legal, HR, Engineers, etc.) and managers and executives.
  - e. Investigators must complete and submit for approval these Intelx sections, by their assigned date:
    - i. Incident investigation.
    - ii. Sub incident form(s).
    - iii. Root cause analysis.
    - iv. Corrective actions.

|                     |            |              |   |
|---------------------|------------|--------------|---|
| Effective Date:     | 02/22/1990 | Approved by: | Matt Dawson – Director, Safety & Training     |
| Last Reviewed Date: | 09/06/2023 | Author:      | Anthony Tagliaferro – Health & Safety Analyst |



## PO-HS-144: Incident Response, Investigations, & Management

- v. Document uploads (private document attachments).
- 6. Investigation Process. This is a three (3) step process:
  - a. Step One: Fact finding (site examination, interviewing, completion of sub incident forms).
    - i. It is imperative the investigator quickly commences a fair and impartial fact-finding process focused on creating a thorough, detailed description of facts/related items before, during, and after the incident.
    - ii. Assuming investigatory steps have already been taken as part of the initial response to the incident (e.g. a manager may have already asked witnesses to provide statements), the investigator should start by gathering, reviewing, and organizing all available information.
    - iii. If the incident scene was not secured, the investigator should, where feasible, secure the scene and equipment for inspection to confirm statements and reported facts or observations.
    - iv. Scene investigation focuses on causative factors – where possible, investigators must note all findings; take photos of the area, equipment, tools, and personal protective equipment (PPE); request and obtain customer security camera footage; recreate the incident; take measurements; and more.
    - v. If injured/involved employee(s) did not complete an FRM-HS-144.1 – Employee Statement Form and/or witnesses did not fill out the FRM-HS-144.2 – Witness Statement Form, the investigator must quickly, confidentially contact relevant parties to get statements/forms completed (information provided on other forms or regular paper are acceptable, if verified).
    - vi. If parties cannot fill out a form, an investigator may transcribe what is verbalized onto the form, noting this was done, and the communicator can sign to validate the statement.
    - vii. Investigators should interview parties whether they have a statement on file or not (to verify statements and/or question parties); investigators are expected to collect all relevant information related to the incident and they are expected to interview anyone who can aid in determining causation.
    - viii. The investigator/interviewer should use the following guidelines when conducting interviews:
      - Follow these principles: seek truth about the incident, work conditions, equipment, methods, hazards, safety culture, training, and behavior; treat everyone involved with dignity and respect.
      - Prepare a thorough list of questions that are informed by what is already known about the incident.
      - Schedule meetings and explain to parties the goal is to uncover the facts so corrective actions can be taken to improve safety; interview all parties individually, as soon as possible, and in private.
      - Stay neutral, fair, and objective; focus on facts and do not blame, offer explanations, or prejudice.
      - Listen intently and take notes, even if someone has already provided a statement; make them comfortable sharing their story and do not interrupt or influence answers/responses.
      - Ask open-ended questions addressing the “who, what, when, where, why, and how” of the incident.
      - Watch for evidence a statement has been influenced by others or is based on opinion; compare statements made in the immediate aftermath versus those made later; and note when someone appears confused or changes their account (even if the change appears subconscious).
      - If possible, complete the interview at the site of the incident (this may aid memory, allow for direct references and context, and it allows parties to point to exactly where something happened).
  - b. Step Two: Root Cause (use facts to conduct a root cause analysis).
    - i. Once an investigator believes they have established the facts and have sufficient information, they begin determining root cause(s) to identify the primary shortfall(s) (not to place fault or blame).
    - ii. The investigator holistically analyzes all data (interviews, statements, expert opinion, photos, video, findings, experiences, research, etc.) to list contributing factors as an aid in determining root cause(s).

|                     |            |              |   |
|---------------------|------------|--------------|---|
| Effective Date:     | 02/22/1990 | Approved by: | Matt Dawson – Director, Safety & Training     |
| Last Reviewed Date: | 09/06/2023 | Author:      | Anthony Tagliaferro – Health & Safety Analyst |



## PO-HS-144: Incident Response, Investigations, & Management

- iii. Contributing factors acknowledge that incidents are typically not born of a single issue but involve a series of events/conditions leading to failure (document “contributing factors” in addition to root cause).
- iv. Contributing factors may include equipment failure, environmental conditions (atmosphere), environment (weather, temperature, lighting), human error, fitness for duty, method/process (policy not followed), incorrect use of PPE, vehicle (distracted driving, speed), and walking/working surfaces (housekeeping).
- v. Once all contributing factors are listed, the investigator completes a root cause process such as the “Five Whys” or “Fishbone” analysis to identify the single most significant factor which caused the incident.
- vi. Contributing factors and root cause(s) drive corrective actions/preventative measures (list in Intelx).
- vii. Investigators should call or meet with managers to present and discuss their findings at this point to speed clearly necessary activity (do not wait for hours, days, or weeks to communicate known shortfalls).
- c. Step Three: Assign corrective actions and preventative measures.
  - i. Once root cause is determined and captured in Intelx, the investigator works with management to determine corrective actions and preventative measures.
  - ii. Corrective actions and preventative measure must address root cause(s) and all controllable contributing factors to prevent recurrence; investigators should discuss/debate root cause analysis with others.
  - iii. Corrective actions and preventative measures are identified, defined, and tracked in Intelx.
  - iv. Thorough corrective actions and preventative measures define the way ahead:
    - What must happen to prevent future similar incidents?
    - What resources are needed and who is responsible for making changes?
    - Is there a need to add to, edit, update, or somehow change systems or policy, procedure, or training?
    - What is the timeline for completion and how will we remain accountable, audit, and inspect?
- d. Document sharing/uploads (private document attachment).
  - i. DO NOT ATTACH any documentation that would be considered protected medical information (including substance screening results); any medically related paperwork from treatment given to an employee is faxed to 614-474-1702 or emailed directly to Corporate Safety (never upload to Intelx).
  - ii. The investigator attaches the following items in the private document attachment section in Intelx:
    - Completed Employee Statements and Witness Statements.
    - Job Safety Analysis (MPW, Porta Kleen, and/or customer forms) and Toolbox Talk Sign Ins.
    - All photos/videos taken (with picture descriptions).
    - Relevant checklists and scene diagrams or sketches.
    - Anything else that could aid in explaining the investigation results.
  - iii. The investigator enters findings of the investigation in the Intelx “investigation results” section.
  - iv. Sub-incident forms (Injury Reporting, Property Damage, Vehicle Incident, DOT Inspection, and Spill & Release) may be assigned and must be completed; multiple sub incident forms can be assigned to a single incident (i.e. vehicle accident involving injuries).
  - v. All assigned sub-incident forms shall be completed thoroughly and accurately prior to submission.
  - vi. After the investigator has completed all required steps of the investigation in Intelx they can submit the investigation for review.
- 7. Process reviews by the Corporate Safety and Training Department follow investigation submissions in Intelx.
  - a. A department representative checks for completeness and make notes; if the department representative determines the investigation is incomplete it is reassigned to investigator, who will be notified by email.
  - b. If the investigation is considered complete and thorough, the department representative assigns a severity level for the incident to determine the review level needed.

|                     |            |              |   |
|---------------------|------------|--------------|---|
| Effective Date:     | 02/22/1990 | Approved by: | Matt Dawson – Director, Safety & Training     |
| Last Reviewed Date: | 09/06/2023 | Author:      | Anthony Tagliaferro – Health & Safety Analyst |



## PO-HS-144: Incident Response, Investigations, & Management

- c. Severity levels are numerical values from 1 to 5, with one being least severe and 5 being most severe; severity level is objective and subjective, based on actual/potential impact (e.g. employee working overhead drops a hammer that lands two (2) feet from an employee on the ground without injury, however, if the hammer would have struck the employee it could have resulted in debilitating injuries – leading to a severity level of 4 or 5).

| Severity | Determining Criteria   | Examples  | Recovery Period   | Level of Review   |
|----------|--|---|---|-------------------|
| Level 1  | Minor injuries, immediate return to work   | First Aid, minor non-DOT vehicle citations  | No to less than one-week recovery                             | District/Regional |
| Level 2  | Moderate injuries, immediate return to work  | First Aid, minor spills easily contained  | Less than one-week recovery                                   | District/Regional |
| Level 3  | Significant injury/illness that require medical treatment, OSHA recordable                       | DOT citations, may require stitches, prescribed medication, or restricted duty work | Recovery lasting more than one week and less than one month   | Corporate Safety  |
| Level 4  | Severe injuries, OSHA recordable/reportable  | Multiple fractures, 3 <sup>rd</sup> degree burns                                    | More than one month and less than one year to recover         | General Manager   |
| Level 5  | Tragedies or life-changing events, OSHA reportable, EPA reportable spills, DOT reportable events | Fatalities, loss of arm, blindness, major spills caused by MPW                      | Over one year to recover from or no full recovery is possible | President         |

- 8. The investigation is then assigned for review. The assigned leader and others, as needed, review the investigation. There are 4 levels of reviews: District/Regional, Corporate Safety, General Manager, and President.
- 9. Principles for all investigation reviews.
  - a. Thorough investigation with appropriate documentation, corrective actions, and preventative measures that will improve safety (preferably eliminating or substituting a hazard) based on facts.
  - b. Investigation answered the three (3) key questions: what happened (incident facts), why did it happen (root cause/contributing factors), and what must be done to prevent recurrence (corrective actions)?
  - c. Lessons clear, policy/procedure verified, and messages/actions ready for communication (need to know).
  - d. Corrective actions have either been completed, are in the process of being completed, or are planned with a method to guarantee accountability.
  - e. Those assigned to complete actions have the support/tools needed.
  - f. Reviews are NOT intended to be punitive; the best reviews are marked by honesty, transparency, and ownership (preventing future incidents and safeguarding health and safety demands clear, open, and critical examinations that address actual issues/problem(s)).
- 10. District/Regional Level Review: appropriate manager determines administrative and coordination procedures.
  - a. Verify incident, root cause(s), and corrective actions are communicated appropriately, in a timely manner, based on the nature of the incident and appropriate manager reviews and closes the investigation.
  - b. Review should include management involved in and directly overseeing the incident, employee involved, district/regional leader(s) to the extent possible, and, if needed and available, a safety professional.
  - c. Best practice: review Level 1 and Level 2 incidents in team Safety Committees at each level of the District/Region to share lessons, assess trends, and prioritize accountability for corrective actions.

|                     |            |              |   |
|---------------------|------------|--------------|---|
| Effective Date:     | 02/22/1990 | Approved by: | Matt Dawson – Director, Safety & Training     |
| Last Reviewed Date: | 09/06/2023 | Author:      | Anthony Tagliaferro – Health & Safety Analyst |



## PO-HS-144: Incident Response, Investigations, & Management

11. Corporate Safety Level Review: incidents of varied severity may be reviewed in this manner, situation dependent.
  - a. Verify incident, root cause(s), and corrective actions are communicated appropriately, in a timely manner, based on the nature of the incident; consider and discuss assessment to inform company improvement; and Health and Safety Analyst closes the investigation.
  - b. Includes management involved in and directly overseeing the incident, employee involved (when possible), and district/regional leader(s) as well as the Director of Safety and Training, Health & Safety Analyst, Workers Compensation Case Manager, and guests (e.g. vehicle reviews include Transportation Safety Supervisor).
  - c. Best practice: Corporate Safety invites attendees, incident management team completes and submits the review presentation prior to the meeting, meeting is conducted to verify cause(s) and actions/tasks and new actions/tasks are assigned, as needed (e.g. policy or procedure revision, creation of training, etc.).
12. General Manager and President Reviews.
  - a. Verify incident, root cause(s), and corrective actions are communicated appropriately, in a timely manner, based on the nature of the incident; consider and discuss assessment to inform company improvement; and appropriate leader closes the investigation.
  - b. Includes management involved in and directly overseeing the incident, employee involved (when possible), and district/regional leader(s) as well as the General Manager and/or President, Directors of Safety and Training and Engineering, Health & Safety Analyst, Workers Compensation Case Manager, and guests (e.g. vehicle reviews include Transportation Safety Supervisor).
  - c. Best practice: Corporate Safety invites attendees, incident management team completes and submits the review presentation prior to the meeting, meeting is conducted to verify cause(s) and actions/tasks and new actions/tasks are assigned, as needed (e.g. policy or procedure revision, creation of training, etc.).
13. An Incident Review template will be provided and may be used for any investigation/incident review; but reviews must also include documentation and administrative attention to detail:
  - a. Documents created by supervisors must have a clear title, subject, incident description, problem statement/approach, controls, root cause(s), findings, immediate-ongoing-future actions, recommendations for others (including corporate/business unit leaders), and questions/concerns.
  - b. In presentation materials, consider and include details on the people and equipment involved, dates, times, general conditions, experience of people involved, training of people involved, status of equipment involved, type and frequency of work being performed, and other supporting documentation.
  - c. Supporting documentation must be relevant, but should include procedures, Job Safety Analysis, customer-specific paperwork, photos/videos of the area and equipment (if permitted), sketches or diagrams, a relevant excerpt of equipment manuals, and other information that would help assess the incident.
14. Prior to sharing information externally consult executive management (recommended consultation includes General Counsel and Safety and Training) to protect employee privacy, follow HIPPA, and ensure a factual and clear message with supporting documentation.
15. All communications, notes, and discussions are legal documents; documenting incidents, including the completion of corrective actions, not only improves safety it improves compliance and lowers risk overall.
16. Post-investigation.
  - a. Best practice: schedule 30-60-90 day or repeatable routine to track and follow up post-investigation; these can be integrated in recurring safety committee meetings and support decision making.
  - b. Verify information was shared with those who had a need to know, verify corrective actions were implemented and are being sustained, and ensure policy or other support changes were made.
  - c. Compare incidents with safety observation trends and enlist employees to support/offer improvements.

|                     |            |              |   |
|---------------------|------------|--------------|---|
| Effective Date:     | 02/22/1990 | Approved by: | Matt Dawson – Director, Safety & Training     |
| Last Reviewed Date: | 09/06/2023 | Author:      | Anthony Tagliaferro – Health & Safety Analyst |



## PO-HS-144: Incident Response, Investigations, & Management

- d. Employees returning to work post-medical treatment injury (i.e. lost time), regardless of work-related or personal, must complete the Return to Work Authorization as outlined in PO-HS-177: Fitness for Duty.
- e. Managers ensure employees with work restrictions work within guidelines provided by the physician.
- 17. Federal and other agencies or organizations:
  - a. Corporate Safety maintains and reports OSHA 300 logs using the Intelex System.
    - i. Recordable incidents must be listed on the appropriate OSHA 300 Log within seven (7) calendar days of notification that the injury occurred; OSHA 300 reports must be signed by a company executive annually.
    - ii. OSHA 300A summaries must be posted in a place visible to employees at every site with an individual log.
    - iii. OSHA 300A summaries will be posted no later than February 1st of the year following the year covered by the records and the posting kept in place until April 30th.
    - iv. OSHA 300 logs, privacy case lists, the annual summary, and the OSHA 301 Incident Report forms must be retained for five (5) years following the end of the calendar year that records cover.
  - b. Recordable incidents governed by federal and state OSHA and MSHA follow a similar pattern, with MSHA requiring quarterly and annual reporting and using different systems.
  - c. Reportable incidents governed by the EPA or equivalent body follow a similar pattern to OSHA.
  - d. Customer and vendor reporting takes a variety of forms, from rapid and verbal to long-term and formal; recommended that operations leaders consult with or at least inform Corporate Safety of incident reporting (specifically for more severe incidents) to support alignment with OSHA/MSHA reporting.
- 18. Managers ensure training for reporting, investigating, and following-up on incidents and systems in use.
- 19. This policy is reviewed as needed; best practice is to review at least every three years.

### Related Documents:

1. PO-HS-101 – Hazard Identification & Risk Assessment
2. PO-HR-108 – Substance Screening
3. PO-HS-143 – Stop Work Authority
4. PO-HS-154 – Safety Audits & Inspections
5. PO-HS-177 – Fitness for Duty
6. PO-HS-204 – Driving
7. PO-HS-206 – DOT FMCSA Drug & Alcohol Testing
8. R&I-HS-144.2: Occupational Health Services Poster
9. R&I-HS-144.3: Government Agency Reporting Timeline Guide
10. R&I-144.4: Incident Procedure Flow Chart
11. FRM-HS-134.1 – Consent for Employee Substance Screening Form
12. FRM-HS-144.1 – Employee Statement Form
13. FRM-HS-144.2 – Witness Statement Form

### Revision History:

1. 02/22/1990 – Original issuance.
2. 12/16/2020 – Major revisions, with policy HS 144 Injury, Illness, and Incident Investigations archived.
3. 09/06/2023 – Updated by removing appendixes and making them R&I documents.

|                     |            |              |   |
|---------------------|------------|--------------|---|
| Effective Date:     | 02/22/1990 | Approved by: | Matt Dawson – Director, Safety & Training     |
| Last Reviewed Date: | 09/06/2023 | Author:      | Anthony Tagliaferro – Health & Safety Analyst |