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Policy
for

Accident Reporting and Investigation

REVISION

Rev No.	DCN No.	Change Summary	Release Date	DCN Initiator	Document Owner
4	DCN0303	Added Sections 9 and 10, Employee Return To Work form and Modified Work Program form.	6/26/07	J. Trodden	R. Segura

Prior revision history, if applicable, is available from the Document Control Office.

1. PURPOSE

1.1 To determine the root cause(s) of the accident through the accident investigation process and to implement corrective action to prevent a recurrence.

1.2 To reduce or eliminate the direct and indirect costs of an accident to the College of NanoScale Science and Engineering (CNSE), by determining current breakdowns in our system and fixing them.

1.3 To pinpoint areas where additional training is needed, resulting in reduced accident frequency.

1.4 To establish a uniform procedure for reporting and investigating accidents.

2. SCOPE

2.1 This program applies to CNSE employees/students, tenant employees, contractors and sub-contractor who have an accident or injury while performing an activity or operation at the CNSE Albany NanoTech facility.

2.2 Tenant employees, contractors and sub-contractors may comply with their own organization's program provided that it meets and/or exceeds the minimum requirements set forth in this procedure.

3. RESPONSIBILITIES

The primary person responsible for accident investigation is the Supervisor/Professor as they are familiar with the task, the people, the equipment and the general work environment.

3.1 The Supervisor/Professor

3.1.1 Complete Supervisor Safety Training within 30 days of their hire date.

3.1.2 Ensure the environment in which the accident occurred is safe for the Employee/Student (s) to resume/continue working.

3.1.3 Ensure medical attention is given to the Employee/Student, if indicated.

3.1.4 Ensure the accident is reported and the appropriate forms are completed and distributed

3.1.5 Notify the EH&S department, before the end of the shift, that an accident occurred. The Employee/Student must complete the "Employee Accident

Statement" (EHS-00026-F1) and then have it signed by their Supervisor/Professor. The Supervisor will complete the "Supervisor's Accident/Injury/Investigation Report" (EHS-00026-F2) and then submit (hand deliver) both reports to the EH&S office. These reports should be completed prior to the end of the shift that the accident occurred in and are due no later than two (2) working days after the accident date. Incidents reports are kept on file in the EH&S office.

3.1.6 Comply with the Worker Compensation Insurance Carrier and may, in some instances, have to appear in court to testify, if suit is brought against CNSE.

3.2 The EH&S Department

3.2.1 Will oversee all accident investigations to ensure that root-cause corrective actions have been identified and implemented.

3.2.2 Administer medical care and follow up with the Employee/Student(s).

3.2.3 Ensure that blank and completed accident reports are available to all Managers, Supervisors and/or Professors.

3.2.4 Review the "Supervisor's Accident/Injury Investigation Report" form (EHS-00026-F2) to ensure that the root cause has been established and that corrective action is implemented.

3.2.5 Review each accident with the Supervisor of the Employee/Process involved in the accident.

3.2.6 Review the "Employee's Accident Statement" (EHS-00026-F1) with the Employee/Student to determine his/her understanding of the accident.

3.2.7 Some accident investigations will require additional information/investigation to determine root-cause corrective action. If applicable, the party involved will be notified by a member of the EH&S Department to provide additional information. The "Guide for Identifying Causal Factors and Corrective Actions," (EHS-00026-F3) can be used to help determine possible appropriate corrective measures.

3.2.8 Track all accident investigations to closure.

3.2.9 Report status of open accident investigations to the other members of the EH&S Committee each month.

3.2.10 Review open action items.

3.2.11 Review new accidents; assign actions as required.

3.2.12 Review Accident/Injury metrics – Quarterly.

3.2.13 Assist Supervisor/Professor with corrective action remedies, if needed.

3.2.14 Complete all investigations for work-related illnesses, i.e. cumulative trauma, cluster illnesses, inhalation exposures, or will outsource investigation to others with appropriate expertise.

3.2.15 Complete all legal reporting requirements to OSHA or our Worker Compensation Insurance Carrier, and any other relevant agencies.

3.2.16 Interview the First Aiders who administer care to an Employee/Student involved in an accident to discuss the care given, and to answer any questions.

3.2.17 Make copies of the Employee's Accident Statement (EHS-00026-F1) and Supervisor's Accident/Injury Investigation Report (EHS-00026-F2) and forward to Human Resource personnel for assignment of a worker compensation number.

3.2.18 Review / re-evaluate this document each year and revise as necessary.

3.3 The Employee/Student Involved

3.3.1 Notify the appropriate personnel that an accident has occurred.

3.3.2 Notify Security on extension 78600 that they need medical assistance.

3.3.3 Report the accident immediately to their Supervisor/Professor and complete the "Employee/Student Accident Statement" (EHS-00026-F1) before the end of their shift. Accident reporting is part of the Safety Orientation Training Program.

3.3.4 Comply with the Worker Compensation Insurance Carrier investigating the claim.

3.3.5 Update EH&S Department regarding medical status each week, at a minimum.

3.4 Witnesses

3.4.1 Ensure that the appropriate personnel are notified.

3.4.2 Ensure that medical assistance is sought by calling Security at extension 78600.

3.4.3 Give their account of what happened to the Supervisor/Professor. Comply with the Worker Compensation Insurance Carrier and may, in some

instances, have to appear in court to testify, if suit is brought against CNSE.

3.5 Security

3.5.1 Assist the Employee/Student, Supervisor, Professor, and/or EH&S Department regarding accidents.

3.5.2 Obtain medical assistance for the injured Employee/Student when instructed to; by the injured Employee/Student, or by an Employee/Student who witnessed the accident.

3.5.3 Notify a First Aider, or the ERT, by pager that an Employee/Student requires medical assistance.

3.5.4 Assist the ERT or First Aider, if off-site medical assistance is necessary, by making those arrangements and escorting the help to the injured Employee/Student.

3.5.5 Complete and forward any necessary reports regarding their involvement in an accident to the EH&S Department.

4. ASSOCIATED DOCUMENTS

4.1 EHS-00026-F1 – Employee Accident Statement

4.2 EHS-00026-F2 – Employee Accident/Injury Investigation Report

4.3 EHS-00026-F3 – Guides for Identifying Causal Factors and Corrective Actions

4.4 EHS-00026-F4 – Near Miss Report

5. DEFINITIONS

5.1 **Accident**: Accidents are unplanned events which interrupt the smooth flow of production or represent a failure in your production system. Accidents result in direct costs and indirect costs to the company. For the sake of this document, the term "accident" also includes "near misses."

5.2 **Accident Investigation Process**: An efficient means to investigate work-related accidents where the root cause is determined and corrective actions are implemented. All investigations are tracked to completion.

5.3 **Direct Costs**: (as they relate to accidents), include Worker's Compensation Insurance premiums, medical bills...

5.4 **EH&S**: Environmental, Health and Safety.

5.5 **Indirect Costs**: (as they relate to accidents), include lost work time, damaged equipment, training a new worker, spoiled work, loss of production...

5.6 **Near Miss**: A "near miss" is any incident or occurrence that could have resulted in an accident but didn't.

5.7 **Root Cause**: The reason(s) that caused the accident to occur. The multiple causation theory of accident investigation states that accidents are very rarely caused by only one unsafe act or condition. It has been proved that the majority of accidents are caused by a combination of several unsafe acts or conditions.

6. ACCIDENT INVESTIGATION PROCESS

6.1 Immediate Response for Supervisor/Professor

6.1.1 The Employee/Student or Witness reports the accident immediately.

6.1.2 Medical attention is sought via 78600.

6.1.3 Remove the Employee/Student to a safe area, people are the first priority; shut down obvious or known hazards.

6.1.4 Employee/Student speaks with Supervisor and then completes the “Employee Accident Statement” (EHS-00026-F1) before the end of the shift.

6.1.5 The Supervisor/Professor is responsible for immediate action taken to correct the accident.

6.1.6 The Supervisor/Professor immediately investigates the accident while the facts are fresh in people’s minds. He/she ascertains the following:

1. Visits the scene of the accident
2. Talks with Witnesses individually; if there are conflicts with the information, question the Witnesses again individually
3. Considers all possible causes as most accidents are caused by a number of different factors.

6.2 Benefits may be denied if the Employee:

- Does not report in a timely manner, or

- Repeatedly violates, or knowingly violates, a safety or operational protocol that results in an accident or injury, or
- Becomes intoxicated due to illegal drugs or alcohol.

6.3 For work-related injuries to Employees:

- Do not use your personal health insurance for medical treatment or prescriptions.
- Employees placed on lost time or restricted duty must provide a written note from their doctor to Human Resources.
- Employees on lost time cannot return to work without a doctor's note which authorizes them to come back to work.

6.4 Accident Factors

6.4.1 Environmental Condition Factors include: were there any unusual job conditions; lighting, noise, temperature chemical hazards, or physical hazards.

6.4.2 People Involved Factors include: proper job placement, appropriate training, adequate experience on job and equipment, health status, fatigue or other factor, emotional state, age, attitude, or were there other people involved.

6.4.3 Equipment Involved Factors include: machines, guards, workstation layout, PPE, right machine for the job, properly maintained equipment, tools, or appropriate tools for the job.

6.4.4 Management Involved Factors include: was the procedure followed, was there a written procedure, what procedure was the person following, can it be done in a safer manner, was the job rushed, was the department understaffed, or time and shift.

6.5 Follow-Up Response for Supervisor/Professor

6.5.1 Ensure that the Employee/Student has completed the Employee Accident Statement Form (EHS-00026-F1) before the end of the shift.

6.5.2 The Supervisor/Professor must complete the "Supervisor's Accident/Injury/ Investigation Report" (EHS-00026-F2) and then submit (hand deliver) both reports to the EH&S Department. These reports should be completed prior to the end of the shift that the accident occurred in and are due no later than two (2) working days after the accident date.

6.5.3 Report the incident to the area Manager; as he/she and you are responsible for taking action to prevent a recurrence.

6.5.4 Begin process to implement corrective actions so accident will not reoccur. Utilize available resources to bring closure to the investigation. Please note: the Supervisor/Professor is always responsible for immediate accident investigation and reporting. However, some work-related illnesses (e.g. carpal tunnel syndrome, ergonomic complaints) will be investigated to closure by the EH&S Department or other experts..

6.5.5 Implement/communicate corrective actions in all areas he/she is directly responsible for.

6.5.6 Share knowledge with his/her Manager.

6.5.7 Submit bi-weekly status reports to the EH&S Department on investigations open longer than 30 days.

6.6 Follow-Up Response for EH&S Department

6.6.1 A member of the EH&S Department reviews the completed reports and either accepts the report as is, or requires follow-up action. Follow-up actions must be tracked as open action items in the EH&S Committee meeting minutes.

6.6.2 Complete all investigations to closure for all work-related accidents or illnesses, e.g. cumulative trauma, cluster illnesses, inhalation exposures; or will outsource investigation to others with appropriate expertise.

6.6.3 Accidents and injuries are tracked by EH&S via the Monthly Accident Report and Accident Log Sheet. Each accident or injury is reviewed by a member of the EH&S Department along with the Manager of the Employee/Process involved in the accident.

6.6.4 Each fiscal year, a cumulative review of accidents will be held. The purpose of this review will be to: pareto reviews of accidents, establish corrective actions, and to set new goals. The review includes actual performance versus stated goals, and requires that conclusions be recorded in the EH&S Committee meeting minutes.

6.6.5 All accidents are evaluated by a member of the EH&S Department using the EH&S Risk Assessment Process. The purpose of this Risk Assessment Process is to identify which types of accidents are most likely to result in the most severe injuries, and then to take corrective measures to avoid or reduce those risks. All accidents are evaluated so that the management can identify and prioritize the action, if any, that needs to be taken.

7. EH&S DEPARTMENT ACCIDENT REVIEW PROCESS

7.1 All completed accident reports will be kept in a binder located in the EH&S office. The reports shall be kept in chronological order by fiscal month and year.

7.2 Monthly accidents reports will be assigned case numbers starting with the fiscal month and year, and ending with consecutive numbers. The consecutive numbering system will begin with the number "1" at the start of each new fiscal month.

7.3 The EH&S Department will determine which accidents require root-cause analysis and additional corrective action; then will follow-up with them accordingly. The status of the corrective action will be tracked in the EH&S Committee Meeting minutes. The records for completed corrective action will be kept in the EH&S Department.

7.4 Guides for Identifying Causal Factors and Corrective Actions (EHS-00026-F3) can be used to document corrective actions.

8. NEAR MISS

8.1 A Near Miss Report form (EHS-00026-F4) must be completed for all incidents/accidents, if under different circumstances, it could have resulted in a personal injury.

8.2 This form can also be used for potential hazard identification, for product/property damage and/or production interruption. It is important to realize that the same factors causing a near-miss accident at one time, can cause a major injury the next time.

9. RETURN TO WORK

9.1 A Return To Work form (EHS-00026-F5), or note from the treating Physician enabling the Employee to return to work, must be completed and signed off by the Employee's Supervisor, the Human Resource Manager and EHS Manager. This applies to all Employees who have been away from work due to an injury they sustained at work, before they will be authorized to return to work.

10. MODIFIED WORK

10.1 A Modified Work Program (EHS-00026-F6) has been established at CNSE to allow Employees, who have been injured at work, to return to partial or restricted work duty.

10.2 In order to aid with the proper placement of affected Employees, such restrictions must be documented by the treating Physician by completing the Modified Work Program form (EHS-00026-F6).

10.3 Once the modified work period has expired, the Employee still can not return to full duty, until the treating Physician completes the Return To Work form (EHS-00026-F5) as mentioned in Section 9.0.