Sevita

S.A.F.E. Program
Safety Action for Employees

NeuroRestorative / NV
Company/State

FY24

Employee Safety and Risk
Revised: 7/26/2023

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Section 1: Introduction

Sevita values people, those we serve and those that join us on our mission. Sevita is committed to the safety and wellbeing of all employees as we strive to prevent workplace injuries and illnesses by maintaining a safe and healthy environment where work is rewarding and growth is recognized. The shared values, goals, and practices of our safety efforts reflect this commitment.

The Safety Action for Employees Program or S.A.F.E. Program provides key actions and strategies for our leaders to establish a culture of safety. We are committed to continued efforts to prevent and reduce employee injuries through a clear understanding of roles, expectations and tools.

For each operation the S.A.F.E. Program has the following objectives:

- Foster management responsibility for the success in Operations' safety performance
- Encourage ownership and participation in the execution of the S.A.F.E Program by Operations Leadership
- Establish systems for hazard identification, analysis, investigation and controls to reduce the risk of employee injuries and illnesses
- Support ongoing communication with local employee teams who take personal ownership for their safety and for the Individuals Supported
- Ensure the alignment of local safety committee objectives with the Operations S.A.F.E. Program goals
- Prepare and deliver safety trainings that provide knowledge of risk behaviors and allow employees to take corrective action for successful safe work performance
- Ensure Programs meet Federal, State, and Local Regulations and Occupational Safety and Health (OSHA) standards
- Review Programs periodically, and revise with any changes to ensure ongoing compliance with Federal, State, and Local Regulations and Occupational Safety and Health (OSHA) standards

This program represents a permanent commitment to a culture of safety. We want to sustain the program effectiveness and consistently improve our performance.

In closing, I want to affirm my full support of our S.A.F.E. Program activities. We can make a difference and look forward to your active participation in this important effort.

Bruce W Kuluris	Vice President Operations
Signature of Senior Leader	**Title of Senior Leader**

Annualized Review and Revision Acknowledgement

Julie Wallace	Quality Director
Name of Local Editor	**Title of Local Editor**
Julie Wallace	9/26/23
Signature of Local Editor	**Date of Edits**

Statement of Intent

It is the intent to provide a safe and healthy workplace for all employees by implementing an effective safety program.

Purpose

The purpose of the S.A.F.E. Program is to establish policies, procedures and practices.

Scope

The S.A.F.E. Program applies to all employees and operations. Principles set forth in the S.A.F.E. Program will govern all related applicable programs and trainings. Training and inspection requirements for other agencies and/or certifying entities shall be coordinated to ensure compliance with Federal, State, and Local Regulations and Occupational Safety and Health (OSHA) standards.

Goals and Objectives

Goal

We will work towards reducing workplace injuries and illnesses.

Objectives:

1. The reduction benchmarks will be based on NAICS industry Standards
   - Services within Sevita range between 1.0 and 7.0/injuries per 100 employees
   - The Continuous Quality Improvement (CQI) Plan will identify the annualized injury rate goal
2. Address all employee safety issues in a timely manner. Hazards that are determined to pose an imminent danger of death or serious physical injury will be addressed immediately. Other hazards should be corrected when identified, for those that cannot be corrected immediately a target date will be set within a reasonable timeframe.
3. Perform safety inspections at all locations and apply corrective action to all hazards identified during the process.
4. Investigate all accidents and implement corrective action in a timely manner to prevent future occurrences.
5. Complete all mandatory and location specific safety related trainings on an annual basis.

Progress toward Goal completion will be documented on the Continuous Quality Improvement (CQI) Plan and shared with Senior Leadership through the Sevita Quality Indicators (SQI) Report.

Goal

Safety Committees will meet regularly to establish and maintain a company culture that is committed to workplace safety and health.

Objectives:

1. Actively participate in Employee Safety and Risk Safety Leadership Calls.
2. Conduct regular safety meetings to:
   - Disseminate information provided during Safety Leadership Calls
   - Communicate with employees about specific workplace safety/health issues and protections in place
   - Build an overall awareness of employee safety and health
3. Actively enforce all safety rules throughout the company.
4. The Safety Committee will ensure meetings take place throughout the year, maintaining a routine meeting schedule and meeting minutes documenting recommended actions.

Required Actions

1. **Edit** the following Programs to ensure compliance with Federal, State, and Local Regulations and Occupational Safety and Health (OSHA) standards: The *S.A.F.E. Program*, the *Emergency Response Plan*, and the *Respiratory Protection Program.*
2. **Review** and **Implement** the S.*A.F.E. Program, Emergency Preparedness Program and Emergency Response Plan, Workplace Violence Prevention Program, COVID-19 Prevention Program, Respiratory Protection Program, Hazard Communication Program*, and *Transportation Services Program.*
3. **Ensure training** occurs with all employees **Initially**, with **Changes**, and on an **Annual** basis for the following: The S.*A.F.E. Program, Emergency Preparedness Program and Emergency Response Plan, Workplace Violence Prevention Program, COVID-19 Prevention Program, Respiratory Protection Program, Hazard Communication Program, Transportation Services Program, and Reporting Work Related Injuries/Illnesses.*
4. **Provide additional employee training** based on assessment of identified hazards, elevated risk, or more stringent local standards.

Section 2: Roles and Responsibilities

All Employees

- Complies with all established safety policies, procedures, and practices
- Completes required training as well as job specific safety and prevention training
- Performs work activities within the requirements and safe practices established by the company
- Correctly uses personal protective equipment, safety and durable equipment, materials, and procedures
- Performs assigned safety duties
- Reports safety hazards to their supervisor and resolving safety hazards when possible
- Participates in safety-related activities as assigned
- Reports work-related injuries and illnesses to your supervisor as soon as possible
- Complies with injury-related work modifications and restrictions

Operations Leadership

Supervisors *(all employees who assign work to and otherwise manage other employees)*

- Implements all safety programs
- Communicates job hazards to employees through the Job Safety Analysis (JSA)
- Conducts safety meetings to communicate and control hazards and build awareness of workplace safety and health issues
- Assesses the safety of specialized equipment, materials, and procedures in their work location(s)
- Conducts periodic safety inspections of work location(s)
- Provides necessary Personal Protective Equipment based on workplace hazard assessment
- Trains employees on all Federal, State, Local, and Company required Safety Topics
  - Including the proper use of equipment (safety, specialized, and personal protective equipment)
  - Facilitating training topics related to accident and injury trends on a regular basis
  - Providing additional training to employees who have been injured
- Supports the workers' compensation claims process with the involvement of the Injured Employee, Employee Safety and Risk Specialist, Sevita Claims Manager, and Operations Leadership
- Conducts Supervisory Accident Investigations within three business days of the incident in order to determine the root cause
  - Reviews the Supervisory Accident Investigation for accuracy, completeness, and preventative actions
  - Follows up and corrects hazards noted within the Supervisory Accident Investigation, by employees directly, and/or via the safety committee meetings minutes
- Maintains a current inventory list of the hazardous substances being used at the site and corresponding Safety Data Sheets (SDS's) for those substances - *VelocityEHS SDS & Chemical Management* https://login.ehs.com/

State and Corporate Leadership

- Assumes the Leadership role in the S.A.F.E. Program by:
  - Partnering with Employee Safety and Risk Managers to revise annually
  - Assigning responsibility for the various aspects
  - Ensuring available resources and management to successfully implement
  - Verifying that all employees understand their roles and responsibilities
  - Disseminating new and updated safety materials and processes
  - Monitoring implementation
- Supports a company culture that is committed to workplace safety and health through active involvement in safety meetings
- Provides reports to Operations, including areas of improvement and recommendations
- Meets with supervisors to follow up on actions necessary to correct causes of employee accidents/injuries
- Ensures all required Safety Trainings are being conducted
- Participates in reviews to verify accuracy of OSHA 300 Logs
- Distributes 300A Summary Logs to all locations for mandatory posting February 1st – April 30th

Operations Supports

Human Resources *(Directors, HR Operations, Employee Relations, Talent Acquisition)*

- Partners with Employee Safety and Risk, Sevita Claims Managers, Operations, and Quality Improvement when appropriate
- Supports Policy and Procedure field implementation
- Supports a company culture that is committed to workplace safety and health through active involvement in safety meetings
- Partners with Employee Safety and Risk for intersectional tasks involving employee safety matters, workplace violence incidents, OSHA activity/inspections/investigations, and workers compensation claims. This may include: Workplace Violence Reports, Investigations, Legal Claims, Leaves of Absence, Return to Work, the Interactive Process and Corrective Action

Quality Improvement

- Partners with Employee Safety and Risk, Sevita Claims Managers, Operations Leadership, HR Directors, HR Operations Managers, and Employee Relations to support employee safety and injury processes
- Supports the location safety inspection process, ensuring they occur as required and that identified environmental issues are resolved
- Supports a company culture that is committed to workplace safety and health through active involvement in safety meetings
- Supports locations with enhanced risk (*pattern, high frequency, severe employee injury*) that involve Individuals Supported
- Evaluates injuries of Individuals Supported, which may contribute to employee injuries or safety issues

Employee Safety and Risk

Employee Safety and Risk Specialist

- Supports the processes involved with Workers' Compensation Claims, Auto Incident/Accident Injuries, and facilitating progressive return to work strategies and partners with Supervisors, State and Corporate Leadership, and Sevita Claims Managers
- Facilitates the early return to work process and monitors modified duty work status until resolved
- Reviews completed Supervisory Accident Investigations for timely, thorough and accurate completion, including actions taken to prevent injuries
- Distributes internal Safety Resources, Toolkits, Training Shorts, and online supports to Operations
- Participates as required in safety and risk reduction meetings
- Supports the OSHA recordkeeping process

Employee Safety and Risk Manager

- Serves as subject matter expert to Operations regarding maintaining a workplace that is free from recognized hazards that are causing, or likely to cause, serious physical harm
- Provides support as subject matter experts in safety and prevention, risk reduction, safety solutions, safety committees, training, programs, toolkits, OSHA involvement, and regulatory compliance
- Routinely maintains, reviews, updates, and disseminates safety materials
- Works with Operations Leadership and Supports to drive the development of the State specific S.A.F.E. Program
- Collaborates with Senior Leaders on identifying supports and resources to prioritize and assist locations with elevated risk
- Promotes and develops safety-related training resources that directly impacts workplace safety
- Supports safety inspection process by communicating regulatory standards and providing resources that meet applicable regulations
- Facilitates ESR Safety Leadership Meetings with Operations Leadership and provides content for local Safety Committees
- Provides critical incident support for serious injuries, serious vehicle accidents, and incidents of workplace violence
- Provides guidance regarding employee safety and workers' compensation processes
- Reviews workers' compensation data and provides support to locations based on injury trends, high frequency, or the serious nature of employee injuries
- Guides all OSHA responses to work related serious injuries (and other reportable events), complaints, investigations, and inspections
- Supports a coordinated response to other external regulatory agencies concerning workplace health, safety, and environmental compliance with matters of actual or potential regulatory enforcement action, investigations, or employee complaints
- Facilitates OSHA Recordkeeping and Bureau of Labor Statistics (BLS) Annual Survey processes

Workers' Compensation, Auto Liability, Property Claims Department

Workers' Compensation and Auto Liability Claims Manager

- Provides strategic risk claims consultation and guidance to Human Resources, Operations, Employee Safety and Risk, and Third Party Administrators for effective claim management
- Serves as subject matter experts on workers' compensation claim management (bills, lost time, treatment approvals) and workers' compensation, auto liability, and legal activity
- Delivers highly customized claims management reviews focusing on financial risk and claims analysis
- Partners with Operations and Employee Safety and Risk Specialists to support return to work processes
- Facilitates and maintains relationships with claims adjusters, insurers, outside legal counsel, and other claims related parties
- Partners with Operations on managing and administering worker's compensation claims
- Provides claims loss analysis, and claims compliance expertise to mitigate employee lost work time
- Serves as a liaison with Safety and Risk Managers to identify and control risk behaviors to reduce loss

Additional Supports

☐ Behavioral Analyst ☑ Nursing/Medical ☐ Training ☐ Other: _____
☑ Maintenance ☐ Intake/Admissions Coordinator ☑ Office Manager ☐ Other: _____

Identified support positions participate in employee safety related meetings, provide resources, and supports as directed.

Additional responsibilities, if needed: _____

Local Safety Committees

Chairperson Responsibilities

- Establishes and maintains a company culture that is committed to workplace safety and health
- Maintains responsibility for the Safety Committee meeting regularly
- Communicates with local Operations regarding safety issues and Committee activities
- Leads or delegates a designee to:
  - Lead all meetings and Committee activities
  - Summarizes decisions and assigns action items
  - Debriefs, evaluates, and plans for improvement
  - Assigns tasks and projects to Committee members and ensures completion of assigned tasks
- Participates in ESR Safety Leadership Meetings

Committee Responsibilities: Membership Varies (Operations, QI, HR, Training, Clinical, Maintenance)

- Attends and participates in all Committee meetings and completes action items assigned
- Directs the distribution of safety information

Section 3: Safety Committees

The local Safety Committee establishes and directs comprehensive safety policy for the organization.

The Mission of a Safety Committee

- Support the organization's safety program
- Identify and address Operations safety risks, issues, patterns, and trends
- Serve as an advisory group to the Operations Senior Leader
- Get supervisors and employees actively involved in safety

The Function of a Safety Committee

During the year, regularly review records to see where your injuries and illnesses are occurring. Look for any patterns or repeat situations. These records can help you identify hazardous areas in your workplace and pinpoint where immediate corrective action is needed.

- **Focus on Prevention** - Provide a forum for discussion and solution of employee safety issues brought to the attention of safety committee members before an accident/injury occurs
- **Review Accident/Injury Records** - Review and analyze employee accident reports and review claims to determine if any areas of improvement are identified
- **Eliminate Hazards** - Take action to eliminate safety hazards noted during safety inspections, and review Supervisory Accident Investigations. Refer unsolved safety issues to Supervisors, escalating serious concerns to Employee Safety and Risk and Quality Improvement as needed for review and follow-up
- **Evaluate Effectiveness** of programs, goals, and outcomes and initiate action necessary to make improvements

The ***'The Safety Committee Toolkit'*** and Supporting Materials are available in the Employee Safety and Risk iServe Library.

Section 4: Worksite Analysis

Sevita has a duty to provide to each employee job duties and a place of employment that is free from recognized hazards that are causing or are likely to cause death or serious physical harm[i].

There are five primary strategies to determine if this criterion is being met.

1. Using Job Hazard Evaluations/Job Safety Analysis
2. Performing Safety Assessments
3. Conducting Safety Inspections
4. Investigating all Accidents
5. Completing Trend and Pattern Analysis

Job Hazard Evaluations/Job Safety Analysis

Safety Assessments

Safety Assessments are a proactive, in depth look at your workplace to identify situations, processes, etc. that may possibly cause harm to employees. An assessment reviews existing safety and operation policy and procedure, evaluates workforce recognition of these processes, examines if safety management systems are communicated, understood and integrated into operations, and action plans are being implemented. After identifying the potential workplace hazard, a determination is made on how likely and severe the risk is, and what measures should be in place to effectively prevent or control the hazard. Job hazard evaluations, along with other available tools noted in the table below, are the assessment processes used to complete this identification.

Job hazard evaluations will be completed on a routine basis.

- This analysis will assess all work conditions to identify, protect, and eliminate, existing or potential hazards
- This will be documented on the Job Safety Analysis (JSA)

The job hazards will be communicated to employees through the Job Safety Analysis (JSA).

- Communication will occur upon hire and the Job Safety Analysis (JSA) will be attached to the current position description

The Job Safety Analysis (JSA) is to be reviewed with employees on an ongoing basis

- Annually
- With any revisions
  - Changes in job functions

- When new or previously unidentified safety hazards are recognized
- Whenever new substances, processes, procedures or equipment are introduced to the workplace that represents a new occupational safety, or health hazard

The Job Safety Analysis (JSA) is to be reviewed, and revised as needed, by Employee Safety and Risk and Operations Leadership on an annual basis or more frequently if the following occur:

- When an occupational injury or illness occurs
- As requested by the Employee Safety and Risk Department after serious injuries
- Or upon request from Senior Leadership

Assessment	Location Stored	Frequency
Job Safety Analysis	Completed JSA's are maintained in the employee's Personnel File *JSA Templates are located in the Employee Safety and Risk Library on iServe*	☑ Reviewed Annually ☑ With any revisions
Emergency Hazard	Completed **"Emergency Hazard Assessments"** are stored with the Emergency Preparedness Program/Emergency Response Plan located: In the Disaster Manual at each nurses station and DON/Admin office	☑ Reviewed Annually ☑ With any revisions

Location Specific Assessments *(Documents listed below are available for use based on unique location needs)*	
Safe Handling	Handling Tasks Hazard Assessment, Area Design Checklist, Tiering Assessment
Crisis Management	*Functional Assessments for Behavior Supports are driven through Operations/Quality Improvement*
Slip/Trip/ Fall	Indoor Checklist, Outdoor Checklist
Transportation Safety	Auto Safety Checklist, Company Vehicle-Checklist, Employee Personal Vehicle-Checklist, Vehicle Inspection Checklist, Wheelchair Securement Checklist
Workplace Violence	Securing Protecting Valuable Goods-Assessment, Transporting People Assessment, Working Alone or in Small Numbers-Assessment, Working in a Community Based Setting-Assessment, Working in High Crime Areas-Assessment, Working With Volatile People-Assessment, Workplace Violence Hazard Checklist, Workplace Violence Survey
Office Ergonomics	Computer Workstation Ergonomic Checklist, Computer Workstation Ergonomic Self-Assessment
Maintenance Safety	Maintenance - Physical Plant Hazard Inspection Checklist

Safety Inspections

Safety Inspections look at the physical conditions and work practices in a workplace. Safety inspections are performed to identify unsafe acts or conditions, and determine if safe employee behavior is sustained within operation processes and compliant with regulations, standards, and best practices. The overall goal of a safety inspection is to identify hazards so they can be eliminated, guarded, or protected against.

Safety Inspections will be completed on a routine basis.

- This inspection will assess all work conditions to identify, and eliminate, existing or potential hazards
- This will be formally documented and will contain the following items
  - The name(s) of the person(s) conducting the inspection
  - The unsafe conditions, work practices and safety hazards that were identified
  - Actions taken to correct the identified unsafe conditions, work practices and safety hazards

A properly trained Designee will conduct routine safety inspections.

- Inspection results will be shared with Supervisors, and serious concerns escalated to Employee Safety and Risk and Quality Improvement for consultation
- Required safety actions will be implemented in a timely manner and final execution verified by Operations Leadership

The frequency of inspections is as follows:

Inspection	Title of Document(s) and Location Stored	Frequency
Environmental	In the maintenance binder in the maintenance office	☑ Monthly ☐ Quarterly ☐ Semi-Annual ☐ Annual ☐ Other:
Vehicle	In the facilities van	☑ Monthly ☐ Quarterly ☐ Semi-Annual ☐ Annual ☑ Other: Prior to drive
Fire Extinguishers	Fire Extinguisher inspections are initialed on the fire extinguisher tag unless otherwise noted (Utah keeps an inspection list due to someone removing a tag previously)	☑ Verify Monthly ☑ Certified Annually

Smoke/Carbon Monoxide		☑ Every 6 months
As Applicable	**Location Stored**	**Frequency**
AED	In a centrally located area of the building *AED's should be inspected regularly and maintained per manufacturer's recommendations. Follow all State and local regulations*	☑ Annual ☑ Other: monthly
Fire Safety	☑ Sprinkler System / ☑ Emergency Lighting / ☑ Emergency Generator In the maintenance binder in the maintenance office.	☑ Frequency: Monthly, Annually, Semiannually
Adaptive Equipment	☐ Manual Lift / ☑ Electric Lift / ☑ Vehicle Lift / ☐ Wheelchair/Occupant Restraint *(belts, retractors, etc.)* In the maintenance binder in the maintenance office *Manufacturer's instruction for service/inspection frequency will be followed.* ***Vehicle Lifts*** *should be inspected by a certified professional annually*	☑ Frequency: monthly

Hazard Correction

Hazards that are determined to pose an imminent danger of death or serious physical injury will be addressed immediately. Other hazards should be corrected when identified, for those that cannot be corrected immediately a target date will be set within a reasonable timeframe.

Immediate corrections may include:

- Cautioning off specific areas with signs and/or tape to preventing employees' access
- Preventing re-entry after evacuation, for example when addressing potential natural gas leaks
- Calling maintenance for assistance
- Obtaining further direction from a supervisor
- Calling emergency services (911) as needed

Accident Investigation

An accident investigation is a crucial part of the aftermath of any incident that results in an employee **Injury** or an event that presents a serious threat to the health and safety of the employee.

- Accidents resulting in an employee injury should be investigated within three business days after they occur
- Vehicle Incidents and Accidents should be investigated within three business days after they occur

An employee accident investigation is an account of an incident, not a recap of the employee's statement. It is based on factual information gathered by a thorough examination of all factors involved. This includes an objective evaluation of all facts, opinions, statements, and related information, as well as, definite action steps to prevent recurrence.

Properly trained and qualified supervisors will conduct investigations and will identify the following:

- All pertinent information required in determining the root cause of the incident
- The circumstances of the accident
- Accident cause or causes
- Unsafe behaviors or conditions that contributed to the accident
- Actions taken to prevent future occurrences

The ***'Workers Compensation Toolkit'***, ***'Auto Liability Toolkit'***, and ***'Employee Safety Investigations'*** are available in the Employee Safety and Risk iServe Library.

Trend/Pattern Analysis

Routinely conduct an Injury Trend Analysis to determine if actions are necessary to reduce and eliminate safety hazards, establish safety programs, policies, or procedures that address areas of risk.

- This is done by reviewing and analyzing current and trending employee accident/injury data
- Consider reviewing the potential for employee injury contained within incident reports of the Individuals Supported

Standard Reports

Reports for Review

A variety of existing reports may be used for this analysis:

- Sevita Safety Report
- Sevita Auto Accident Report
- Sevita Workplace Violence Report
- Open Claims Report
- Individualized Trending Reports
- Quality Improvement Reports *(Incident Reports, SQI, CQI, TQS)*
- First Report of Injury
- Employee Accident Form
- Supervisory Accident Investigation
- Auto Incident/Accident Report & Inquiry
- Localized reports specific to an alias or service type

Interpreting the Reports

Standard reports should be reviewed monthly to support Operations Leadership in identifying:

- Indications of **Increased Hazards** in the work environment by reviewing Job Safety Analysis, Supervisory Accident Investigations, Injury Trend Analysis (Safety Report), and near miss reports
- **Trends or Patterns** noted in the reports
  - Areas of Concern: Combative Behavior, Overexertion, Slips, Trips and Falls, and Transportation Safety
- **High** or **Increased Frequency** of employee injuries and/or multiple injuries occurring at same location.
  - In our industry an average frequency ranging between 1.0 and 7.0 injuries / per 100 employees (depending on service line) is a standard benchmark number that illustrates a healthy and safe workforce.
- **High** or **Increased Severity** of workplace injuries.
  - In our industry, 80% Medical Only claims to 20% Indemnity claims is a standard benchmark number that illustrates an average ratio of claim severity in the workforce
- **High** or **Increased Frequency** of Vehicle Incidents and Accidents

Implementing Solutions

There are tools to help Operations Leadership determine actions necessary to implement solutions and affect change. The *'Hierarchy of Hazard Controls'* and *'Hierarchy of Hazard Controls Problem Solving Worksheet'* is used to guide the decision making process for determining effective safety solutions.

The first element of the hierarchy provides the most effective and sustainable solutions, by removing the hazard from the work environment. As you move down the listing an increased level of employee participation and Operations supervision is required for achieving positive results.

1. **Elimination:** Stop doing the task or remove the hazard
2. **Substitution:** Replace a process or material with a less hazardous option
3. **Engineering Controls:** Redesign the process or use of equipment, "Engineer out the problem"
4. **Isolate:** Separate the hazard from the worker
5. **Administrative Controls:** Implement policies, procedures, and training to follow when working with the hazard
6. **Personal Protective Equipment:** Provide people with equipment and training
7. **Training:** Training provided to people to increase skill when working with the hazard

A variety of ***Safety Solutions*** for increasing workplace safety are available in the Employee Safety and Risk iServe Library.

Monitoring, Reviewing, and Revising

The Safety Committee supports Operations Leadership in determining the following:

- Effectiveness of established goals and outcomes
- Beneficial long term safety goals, objectives, and strategies
- Injury reduction solutions for hazard prevention and control

'Using Workers' Compensation Data for Injury and Illness Prevention' is available in the Employee Safety and Risk iServe Library.

Section 5: Hazard Prevention and Control

The prevention of work place hazards is much more effective at the planning stage of a potentially hazardous situation. Our objective is for safe work practices that align within operation specific processes and integrate protection of employee health and safety, and wellbeing of the Individuals Supported within our work environment.

Identified trends and noted hazards will guide you on determining effective prevention and control methods. There are existing toolkits that support a concentrated focus on specific hazard prevention and control areas. The ***'Crisis Management Toolkit'***, ***'Safe Handling Toolkit'***, ***'Slip, Trip and Fall Resource Guide'***, ***'Safety Committee Toolkit'***, and the ***'Maintenance Work Toolkit'*** are available for use. Additional toolkits may become available throughout the year.

There are seven formal programs required for hazard prevention and control: **Emergency Preparedness and Response, Workplace Violence Prevention, Bloodborne Pathogens Standard and Exposure Control, Hazard Communication, Infectious Disease Preparedness and Response, Respiratory Protection**, and **Transportation Services**.

Emergency Preparedness Program

It is a responsibility of Operations Leadership to plan ahead for as many types of potential disasters as are foreseeable in order to protect the safety and wellbeing of Individuals Supported, employees, and company assets. A comprehensive emergency response plan involves an accurate all-hazards approach to determine what, if any, hazards inside or from outside the workplaces could cause an emergency.

The ***'Emergency Preparedness Program'*** and ***'Emergency Response Plan'*** address the following:

- Readiness
- Recovery
- Response
- Continuity of Operations

The ***'Emergency Preparedness Program'*** and ***'Emergency Response Plan'*** must include:

- Be in writing
- Be comprehensive
- Identify objectives
- Designate responsibility and authority
- Include a schedule for periodic audits and drills

The **Emergency Preparedness Program identifies** key objectives and actions required to promote employee safety.

1. The Emergency Preparedness Program and Emergency Response Plan are reviewed to meet State or local requirements.
2. Hazard assessments and inspections are conducted to determine the Emergency Situations most likely to occur.
3. A local Emergency Response Plan is developed and implemented.
4. An emergency exit diagram (floor plan) is posted in a conspicuous location, with exit paths designated.
5. All employees are trained on the Emergency Preparedness Program and Emergency Response Plan upon hire, with any changes, and annually thereafter.
6. All required Emergency Preparedness Response Drills are practiced annually, or per local licensing requirements, for each location.

Each location will adhere to the ***'Emergency Preparedness Program'***, ***'Emergency Response Plan'*** and additional regulatory requirements if applicable.

Documents	Location of documents
Emergency Preparedness Program	*Locally the document is stored:* In the Disaster Manual at each nursing station and in the DON/Administrator Office
Emergency Response Plan	*Locally the document is stored:* In the Disaster Manual at each nursing station and in the DON/Administrator Office
	Requires Location Specific Editing and is required to be available to all employees on site

Emergency Drills	Location of documents	Frequency of Drills
Fire Drills	In the maintenance Binder in the maintenance office	*As designated in regulation* ☐ Monthly ☑ Quarterly ☐ Semi-Annual ☐ Annual ☐ Other:
Emergency Drills	In the maintenance Binder in the maintenance office *Each location specific Emergency Response Plan will include drills for Fire, Severe Weather, Workplace Violence, Natural/Manmade Disasters**	☐ Annual *OR as regulated* ☐ Monthly ☐ Quarterly ☑ Semi-Annual ☐ Other:

*A variety of ***Emergency Preparedness Drills*** and Supporting Materials are available in the Employee Safety and Risk iServe Library.

Workplace Violence Prevention Program

The **Workplace Violence Prevention Program** is a comprehensive extension of your formal Emergency Preparedness Program. Workplace violence is violence or the threat of violence against workers.

Categories of Workplace Violence

One may assume workplace violence only involves disgruntled employees, but violence can come from many sources. Sevita supports a planful approach that incorporates the four categories of potential violence.

I	Criminal Intent	The person has no business relationship to the workplace. The person enters the affected workplace to commit a robbery or criminal act.
II	Worker-on-Worker	The person has some employment-related involvement with the workplace, such as a current or former employee, supervisor or manager.
III	Personal Relationship	The person is someone who does not work for the company but has or is known to have had a personal connection with an employee or Individual Supported.
IV	Individuals Supported	There are occasions when an Individual Supported may commit violent acts that are outside of the everyday experience and are determined to be a legitimate threat to safety and well-being of employees.

Levels of Violence

Workplace violence is often subtle, where verbal threats, acts of intimidation and bullying can slowly lead to serious acts of violence, including physical assaults and even homicide. Escalation to violence is typically a process. Usually there are warning signs that an act of violence is about to occur. Potential or actual violent situations will escalate if not defused. The following is a way to understand the levels and how violence can manifest.

I	Bullying Behavior	Repeated, abusive conduct that is threatening, humiliating, or intimidating, or that prevents work from getting done.
II	Disruptive Behavior	Behavior that disturbs, interrupts, interferes, or prevents normal work functions or activities, that threatens the health and safety of others. Examples include yelling, using profanity, waving arms or fists, verbally abusing others, and refusing reasonable job duty direction.
III	Threatening Behavior	Behavior includes physical actions short of actual contact/injury (e.g., moving closer aggressively), general oral or written threats to people or property, (statements like "You better watch your back" or "I'll get you") as well as implicit threats ("you'll be sorry" or "this isn't over").
IV	Violent Behavior	Behavior that includes actions or words that endanger or harm an employee or individual supported, as well as actions that lead a person to reasonably believe that they are in danger (e.g., throwing things, pounding on a desk or door, or destroying property), or specific threats to inflict physical harm (e.g., a threat to shoot a named individual).

The Workplace Violence Prevention Program identifies key objectives and actions required to promote employee safety.

- Workplace Violence risk/hazard assessments are conducted as directed by Operations Leadership
- The Workplace Violence Prevention Program is reviewed to meet State or local requirements
- Workplace Violence Procedures are developed and located in the local Emergency Response Plan
- All employees are trained on the Workplace Violence Prevention Program upon hire and annually thereafter
- Workplace Violence Prevention Drills are practiced annually
- A 'Workplace Violence Report' is completed for threats or occurrence of violence

Documents	Location of documents
Workplace Violence Prevention Program	*Locally the document is stored:* At each nurses station

Program Templates and Supporting Materials are available in the Employee Safety and Risk iServe Library.

Bloodborne Pathogens Standard and Exposure Control Plan

Sevita is committed to providing a safe and healthy work environment for our employees. In pursuit of this endeavor, the Exposure Control Plan is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with OSHA standard 29 CFR 19 10.1030, Occupational Exposure to Bloodborne Pathogens.

The **Exposure Control Plan** includes:

- Determination of employee exposure.
- Implementation of various methods of exposure control, including:
  - Standard Precautions
  - Engineering and work practice controls
  - Personal protective equipment (PPE)
  - Housekeeping
  - Hepatitis B vaccination
  - Post-exposure evaluation and follow-up
  - Communication of hazards to employees and training
  - Recordkeeping
  - Procedures for evaluating circumstances surrounding an exposure incident

The **Bloodborne Pathogens Standard and Exposure Control Plan** identify key objectives and actions required to promote employee safety.

- The Bloodborne Pathogens Standard and Exposure Control Plan is reviewed to meet State or local requirements
- The Bloodborne Pathogens Standard and Exposure Control Plan are signed after review, annually, with any changes
- All employees are trained on the Bloodborne Pathogens Standard and Exposure Control Plan upon hire, with changes affecting the employee's occupational exposure (ex: modification of tasks or procedures or institution of new tasks or procedures), and annually thereafter
- The Bloodborne Pathogens Standard and Exposure Control Plan is made accessible to all employees
- Needlestick Prevention Assessment is completed on an annual basis for all locations using sharps
- All needle puncture injuries from contaminated sharps are recorded in a Sharps Injury Log and maintained to protect the confidentiality of the injured employee

Documents	Location of documents
Bloodborne Pathogens Standard and Exposure Control Plan	*Locally the document is stored:* In the Infection Control Manual at each nurses station

As Applicable	Location Stored
Needlestick Prevention *(required if working with Sharps)*	Completed **"Needlestick Prevention Assessments"** are maintained with the Bloodborne Pathogen Standard and Exposure Control Plan located: In the Infection Control Manual at each nurses station ☑ Reviewed Annually ☑ With any revisions
Sharps Injury Log	*Locally the document is securely stored:* In the Infection Control Manual at each nurses station *Supervisors maintain this log for all locations with Contaminated Sharps (needlestick) injuries* *This must be confidentially stored separate from employee personnel files*

The Standard and Exposure Plan Templates and Supporting Materials are available in the Employee Safety and Risk iServe Library.

Hazard Communication Program

The Hazard Communication Program establishes policies, procedures, and practices that meet the requirements of the OSHA Hazard Communications Standard, 29 CFR 1910.1200, USP General Chapter <800> Hazardous Drugs—Handling in Healthcare Settings, and applicable state and local requirements. This Program applies to all Operations and business units.

The **Hazard Communication Program** identifies key objectives and actions required to promote employee safety.

- Establish methods to evaluate potential hazards of chemicals, materials, and drugs, communicate information concerning these hazards, and provide appropriate protective measures to reduce the risk of employee exposure
- Prepare and deliver safety information about the dangers of all hazardous chemicals, materials, and drugs used by the location to all affected employees
- Safety Data Sheets (SDS) should be readily accessible to employees for all hazardous chemicals in their workplace
  - This may be done in many ways, such as in binders or electronically using *VelocityEHS SDS & Chemical Management* https://login.ehs.com/
  - A Chemical Inventory List is printed and maintained at each location. This can be downloaded if using *VelocityEHS*
  - Employees receive training on reading and understanding Safety Data Sheets

Documents	Location of documents
Hazard Communication Program	*Locally the document is stored:* At each nurses station
Safety Data Sheets	☑ Electronically *(Using VelocityEHS)* / ☑ Hardcopy *Locally the document is stored:* At each nurses station
Chemical Inventory List	☑ Hardcopy *Locally the document is stored:* At each nurses station

Program Templates and Supporting Materials are available in the Employee Safety and Risk iServe Library.

Infectious Disease Preparedness and Response Program

The **Infectious Disease Preparedness and Response Program** is to control exposures that may occur in the workplace by establishing policies, procedures, and practices for applicable service settings within the company.

The Infectious Disease Preparedness and Response Program applies to all employees who work with Airborne Transmissible Disease hazards during normal and non-routine or emergency work situations.

The Infectious Disease Preparedness and Response Program identifies key objectives and actions required to promote employee safety.

- The Infectious Disease Preparedness and Response Program is reviewed to meet state or local requirements
- The Infectious Disease Preparedness and Response Program is reviewed periodically, and revised with any changes
- Make the written Infectious Disease Preparedness and Response Program available to employees and Regulatory Representatives as requested
- Employees are trained on the Infectious Disease Preparedness and Response Program

Documents	Location of documents
Infectious Disease Preparedness and Response Program	*Locally the document is stored:* In the infection control manual at each nurses station.

As Applicable	Location Stored
Infection Control *(if required by local regulation)*	Completed **"Infection Control Assessments"** are maintained with the Infectious Disease Preparedness and Response Program located: In the working infection control binder in the DON office. ☑ Reviewed Annually ☑ With any revisions

Specific locations may be subject to additional infectious disease requirements governed by Local, State or Federal regulations.

Program Templates and Supporting Materials are available in the Employee Safety and Risk iServe Library.

Respiratory Protection Program

The purpose of this Respiratory Protection Program is to ensure that all employees are protected from exposure to airborne transmissible diseases, such as COVID-19, through appropriate use of respiratory protection.

The practices and procedures described herein constitute the respiratory protection program under which disposable particulate respirators are effectively utilized and provides information on responsibility, proper respirator selection, medical evaluations, respiratory fit testing, maintenance and care procedures, and training.

The Respiratory Protection Program applicability and implementation will vary from service line to service line.

The **Respiratory Protection Program** identifies key objectives and actions required to promote employee safety.

- The Respiratory Protection Program is reviewed to meet State or local requirements
- The Respiratory Protection Program is reviewed periodically, and revised with any changes
- Applicable employees are trained on the Respiratory Protection Program, proper respirator selection, medical evaluations, respiratory fit testing, and maintenance and care procedures before requiring the use of a respirator, with changes affecting the employee's occupational exposure (ex: modification of tasks or procedures or institution of new tasks or procedures), and at least annually thereafter
- A Respiratory Protection Program Administrator will be designated to oversee the Respiratory Protection Program
- Fit Testers will be designated who are familiar with this Respiratory Protection Program and will follow proper testing procedures.
- The Respiratory Protection Program is made accessible to all applicable employees

Documents	Location of documents
Respiratory Protection Program	*Locally the document is stored:* At each nurse station in its own binder *Requires Location Specific Editing*
Medical Questionnaire	☐ Electronically *(Using Vest)* / ☑ Other: In each employees health file *If Other is checked, locally the document is stored:* *The medical questionnaire is personal medical information and must be confidentially stored*

Medical Clearance	☐ Electronically *(Using Vest)* / ☑ Other: In each employees health file *If Other is checked, locally the document is stored:*
Qualitative Fit Test Record	*Locally the document is stored:* In each employees health file

Program Templates and Supporting Materials are available in the Employee Safety and Risk iServe Library.

Transportation Services Program

Sevita fosters employee responsibility for the success in driver safety and compliance with local, regional, State, and national traffic safety laws.

The **Transportation Services Program** is a comprehensive plan for the employee screening, training, testing, and monitoring of all incidental and commercial vehicle drivers. This program provides key actions, strategies, and resources to guide a proactive approach in preventing vehicle accidents, and is the first line of defense against the high cost of motor vehicle accidents and incidents involving employees and the people we support.

For each operation the **Transportation Services Program** has the following objectives:

- Fostering management responsibility for the success in Operations' transportation safety
- Encouraging regional leader ownership and participation in the development and execution of their Transportation Services Program
- Establishing systems for hazard identification, analysis, investigation, and controls to reduce the risk of vehicle incidents and accidents
- Supporting ongoing communication with local employee teams who take personal ownership for their safety and for the Individuals Supported
- Delivering Safe Driver trainings that increase the skills of our incidental drivers

Documents	Location of documents
Transportation Services Program	*Locally the document is stored:* In each employees file and on Relias and I-serve

Program Templates and Supporting Materials are available in the Employee Safety and Risk iServe Library.

Section 6: Safety Training

We have an obligation to our employees to ensure they are given the tools they need to be successful in their job. This includes quality training pertaining to hazards in the workplace.

Quality safety training should be conducted minimally on an annual basis. Before employees can be held accountable for proper methods and procedures, they must have a full understanding of them. Only through proper training and quality safety observation can this be achieved. No employee should be allowed to work unsupervised who has not received the required training.

Employee Orientation and Annualized Training

New/Acquisition Employee Safety Orientation, and Annualized Employee Safety Training provides a systematic training approach to workplace safety and the presentation of the company/location specific safety policies and procedures.

- All employees will be scheduled to participate in safety training as applicable. In addition, employees will be provided the following safety training:
  - New/ Transferred/ Acquisition employees will be given a safety orientation prior to working with identified hazards
  - All employees will be trained and/or informed of new substances, procedures, or equipment when introduced to the workplace

- All Training shall be documented and will include:
  - The topic(s) covered
  - The name(s) and title(s) of the training provider(s)
  - The date of the training
  - The employee(s) name and signature(s)

Relias is the Learning Management System in use for providing training to all employees.

Relias Course Name	Content	Auto or Manual Assigned: Orientation	Auto or Manual Assigned: Annual
ESR-Orientation	• Reporting a Work Related Injury • S.A.F.E. Program • Emergency Preparedness • Workplace Violence • Bloodborne Pathogens and Exposure Control • Infectious Disease Preparedness and Response • Hazard Communication • Transportation Safety • Safe Lifting/Body Mechanics	*Auto*	*N/A*
ESR-Acquisition Part 1	• Reporting a Work Related Injury	*Auto*	*N/A*
ESR-Acquisition Part 2	• S.A.F.E. Program • Emergency Preparedness • Workplace Violence • Bloodborne Pathogens and Exposure Control • Infectious Disease Preparedness and Response • Hazard Communication • Transportation Safety • Safe Lifting/Body Mechanics	*Auto*	*N/A*
ESR-BBPS-ECP-Operations	• Bloodborne Pathogens and Exposure Control	*Auto*	*N/A*
ESR -Safe Driver Training	• All employees who drive for work related purposes	*Manual*	*N/A*
ESR-Van Driver Training	• All employees who drive Large Passenger Vans (9 or more Occupants) and Adapted Vehicles for work related purposes	*Manual*	*N/A*
ESR-Adapted Vehicle Driver Training	• All employees who drive Adapted Vehicles for work related purposes	*Manual*	*N/A*
ESR-Respiratory Protection Program	• All employees who could potentially be exposed to airborne transmissible diseases and are required to wear respirators when performing job duties	*Manual*	*Manual*
ESR-Annual Training Q1	• Reporting a Work Related Injury • The S.A.F.E. Program	*N/A*	*Auto*
ESR-Annual Training Q2	• Emergency Preparedness • Workplace Violence	*N/A*	*Auto*
ESR-Annual Training Q3	• Bloodborne Pathogens and Exposure Control • Infectious Disease Preparedness and Prevention • Hazard Communication	*N/A*	*Auto*
ESR-Annual Training Q4	• Transportation Safety	*N/A*	*Auto*

There are additional training courses in Relias, search "ESR" for a full listing

OSHA Regulations require that the **noted** training be completed **PRIOR** to an employee working with the identified hazard. If there is a greater risk, or more stringent standards, additional training on the applicable program may be required.

The length and complexity of OSHA standards may make it difficult to find all the references to training. To help employers OSHA's training-related requirements have been excerpted and collected in a booklet.

State/Local Required Training

Additional employee safety training requirements as directed by Specialized Service Lines or Local Regulations.

Topic *(Note: While the State trains on the following subject matter, it is not applicable for all locations)*	☑
CPR	✓
First Aid	✓
Crisis Management Training: As needed	☐
Specialized Service Line Training/Local Regulations:	☐
Other:	☐
Other:	☐
Other:	☐

Injury Prevention/Risk Reduction Training

Additional employee safety, policies, procedures, and training may be required by service line or State/Local regulations and will be based upon identified hazards in the workplace.

Check all applicable to your State. Those checked require an annual training plan.

Topic *(Note: While the State trains on the following subject matter, it is not applicable for all locations)*	☑
Overexertion Prevention *(enhanced proper lifting techniques, body mechanics, and posture)*	☐
Struck By Prevention *(combative behavior, positive behavioral supports, informal behavioral crisis management)*	☐
Slips, Trips, and Falls *(good housekeeping, stair safety, proper footwear, winter safety)*	☐
Contact Exposure *(needle stick prevention, controlling job stress, infectious/contagious agents, extreme temp burns)*	☐
Vehicle Incident/Accident Prevention	☐
Office Safety *(machines, file cabinets, computers, ergonomics)*	☐

Section 7: Communication of Safety and Health Hazards

A communication system is designed to encourage a continuous flow of safety and health information between management and employees without fear of retaliation and in a format that is readily understandable. Note: While the State uses the following systems, not all systems are applicable to all locations.

Methods of Communication

Communication Strategies *(Check all utilized)*

- ☑ One on One employee debriefing activities
- ☑ Local employee meetings
- ☐ Schedule periodic meetings solely for the discussion of safety issues
- ☑ Include safety as a routine agenda item in leadership meetings
- ☑ Safety Committee meetings
- ☐ Targeted Safety Campaigns
- ☐ Employee communication books
- ☑ Safety binder
- ☐ Safety bulletin boards
- ☐ Newsletters
- ☑ Suggestion boxes
- ☐ Safety work order system
- ☐ Specific web site, app, or e-mail address for safety issues
- ☑ Sevita's Open Door Policy
- ☑ Sevita's Compliance Hotline
- ☐ Other: _____

Section 8: Plans of Action

Corrective actions taken to prevent reoccurrence shall also be identified. When an incident results from an unsafe condition, action will be taken to correct and prevent a reoccurrence. If the incident resulted from an unsafe act, action will be taken to retrain and/or discipline the employee, as appropriate.

All actions taken will be documented per company specific procedures and may include the following:

- Supervisory Investigations
- Record of Discussion
- Debriefing Document
- Formal Corrective Action Plan

All action plans shall be overseen by the supervisor to ensure execution is complete. This includes the creation, training, implementation, follow through, review, and revision of ongoing plans.

Section 9: Enforcement of Safety Practices

Supervisors must monitor and hold employees accountable for safe work practices, use of safety equipment, repeated injuries, and following proper procedures.

- Hold employees and supervisors accountable for:
  - Safe work practices
  - Use of safety equipment
  - Repeated injuries
  - Following proper procedures
- Deal with performance issues when they occur including using:
  - Feedback and Coaching
  - Record of Discussion
  - Corrective Action Plans
- Continue to build effective supervisory skills when identifying and addressing safety issues

Section 10: Administrative Policies and Management Directives

All safety related policies and management directives are considered a part of The S.A.F.E. Program.

Section 11: Program Review

The S.A.F.E. Program is to be reviewed on an annual basis and with any substantial changes to company structure, service line specialization, acquisitions/tuck-in's, and any additional pertinent service changes.

- Review and revise company specific safety goals and objectives.
- On an annualized basis evaluate your systems, programs, protocols, and polices to determine if they are adequate and working as intended.
  - Emergency Preparedness
  - Workplace Violence Prevention
  - Bloodborne Pathogens
  - Hazard Communication
  - Infectious Disease Preparedness and Response
  - If applicable, Respiratory Protection
  - Transportation Services
  - Safety Committee Effectiveness
  - Other: _____

- Evaluate your employees:
  - At every level
  - Incorporate into performance snap-shots
  - Utilize safety benchmarks for objective measurements

- Perform safety program reviews
  - Ensuring the elements in place for a safe work environment
  - Verifying compliance with all local safety regulations, and State/Federal OSHA standards

- The Employee Safety and Risk performs an annual review on the required programs associated with the S.A.F.E. Program and incorporates revisions as necessary.

The ***'S.A.F.E. Program Assessment'*** is available in the Employee Safety and Risk iServe Library.

Section 12: OSHA Reporting Occupational Injuries and Illnesses

OSHA Reportable Serious Injury or Death

Notify your Employee Safety and Risk Manager as soon as possible.

Summary of Fatality and Severe Injury and Illness Reporting Requirements

Fatalities	Employers are required to report each fatality within 8 hours of the death, for all fatalities occurring within 30 days of the incident.
Hospitalizations	Employers are required to report each in-patient hospitalization within 24 hours of the hospitalization, for all hospitalizations occurring within 24 hours of the work-related incident. In-patient hospitalization defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.
Amputations	Employers are required to report each amputation within 24 hours of the amputation, for all amputations occurring within 24 hours of the work-related incident. *Definition comes from BLS OIICS Manual 2010.*
Losses of an eye	Employers are required to report each loss of an eye within 24 hours of the loss of an eye, for all losses of an eye occurring within 24 hours of the work-related incident.
Knowledge of event	Employer is required to report if event (fatality, in-patient hospitalization, amputation, loss of an eye) is reported to employer or employer's agent(s).

All employers are required to notify OSHA when an employee is killed on the job or suffers a work-related hospitalization, amputation, or loss of an eye. These cases MUST be reported to Occupational Safety and Health Administration (OSHA) within the following timelines:

- **Report within 8 hours of notification: Fatalities**
- **Report within 24 hours of notification: In-patient hospitalization, amputation or loss of an eye**

After consulting with your Employee Safety and Risk Manager, the team should decide who will report the hospitalization/death to OSHA. You can report one of three ways:

- Call 1-800-321-OSHA (6742)
- Call your nearest OSHA area office, during normal business hours (https://www.osha.gov/html/RAmap.html)
- Visit http://www.osha.gov/report_online

Conduct a thorough investigation to determine cause of the hospitalization/death.

- Communicate results with your Employee Safety and Risk Manager as soon as possible
- Be prepared to respond to an OSHA request for Inspection and Investigation

Note: 22 States *(Alaska, Arizona, California, Hawaii, Indiana, Iowa, Kentucky, Maryland, Michigan, Minnesota, Nevada, New Mexico, North Carolina, Oregon, Puerto Rico, South Carolina, Tennessee, Utah, Vermont, Virginia, Washington, and Wyoming)* have **State OSHA Plans** that may have reporting requirements that differ from the Federal Requirements.

For detail see ***"OSHA Reporting a Fatality or Severe Injury"*** and ***"OSHA State Plans-Reporting Fatalities & Severe Injuries"*** available in the Employee Safety and Risk iServe Library.

Section 13: Recordkeeping

Records of accidents, work-related injuries, illnesses, and property losses serve a valuable purpose, enabling you to learn from past experiences and make corrections for future operations. Upon review, causes can be identified and control procedures instituted to prevent the illness or injury from recurring.

The documentation of occupational incidents, which require medical attention beyond first aid, is required by OSHA. Each fatality, injury, or illness that is work-related, is a new case, or meets one or more of the general recording criteria will be documented on the OSHA Form 300. This information is annually reviewed and certified on the ***Summary of Work-Related Injuries and Illnesses*** (OSHA Form 300A) and is posted at each location between February 1st and April 30th for employee review. These records shall be maintained for five years.

The following records will be maintained for at least the period indicated:

Documents	Record Keeping Guidelines
Written S.A.F.E Program	Life of the program plus 6 years
Environmental Inspection Forms	3 Years
Supervisory Accident Investigation Report	3 years
Records relating to employee communication and enforcement	3 Years
Safety Committee Meeting Sign in sheet and Minutes	3 Years
Symptom Attestation Forms	5 years from the end of the calendar year to which the records apply
Escalation Checklists	5 years from the end of the calendar year to which the records apply
Respiratory Protection Fit Test Pass / Fail results	3 Years
Respiratory Protection Medical Evaluation	30 years after termination of employment
COVID-19 Work Relatedness Questionnaire	5 years from the end of the calendar year to which the records apply
Safety Data Sheets	30 years from the later of: (a) the date the SDS is superseded or (b) the date the hazardous chemical product is no longer kept at the workplace
OSHA 300 Log and Related Materials	5 years from the end of the calendar year to which the records apply
Employee Medical Records	30 years after termination of employment
Employee Safety Training Sign-in Sheets	Individual Sign In Sheets: 7 Years post termination of employment Group Signature Sheet: 7 Years from training date
Bloodborne Pathogens Training Records	Individual Sign In Sheets: 5 Years post termination of employment Group Signature Sheet: 7 Years from training date
Hazardous Chemical Records Related to Employee Training	Individual Sign In Sheets: 5 Years post termination of employment Group Signature Sheet: 7 Years from training date
Records of Significant Adverse Reactions to Chemical Substances	From date reactions first reported, 30 years for records regarding employees, and 5 years for all others
Medical Surveillance Records for Employees Exposed to Toxic Chemicals above Permitted Levels	The longer of: (a) 40 years, or (b) 30 years from termination of employee
Records Related to Those Removed from the Workplace because of Possible Lead Exposure	Duration of employee's employment
Workplace Violence Prevention Training	1 year
Workplace Violence Incidents Records	5 years

Section 14: End Notes

[i] **Occupational Safety and Health Administration** Overarching Public Law 91-596 Complete OSH Act Version ("All-in-One"), General Duty Clause, Section 5, Duties *https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=OSHACT&p_id=3359*