



**Texas Department
of Insurance**

Accident Prevention Plan **Program Guide**

Provided by

**Workers Health
& Safety**

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For Small Business Employers

Preface

This guide is designed to help you eliminate accidents and control potential hazards. The materials in this guide will give you the ideas and tools to make accident prevention part of your standard operating procedures. You have the knowledge of how best to accomplish this in your business. No matter how large or small your business is, how unique your business is, or how many employees you have, the following suggestions can help you control the costs and suffering associated with workplace accidents.

Maintaining a safe work environment can have a positive effect on productivity and operating costs. When you minimize accident exposure, you maximize operating efficiency and decrease operating costs, and that is one of the best ways to boost profits.

An effective Accident Prevention Plan Program can benefit your bottom line. First, a low injury record may reduce the cost of your insurance coverage. Second, every workplace employee accident results in direct and indirect costs. The indirect cost of accidents can have the greatest impact on profits.

Direct costs, such as workers' compensation benefits and medical costs, are obvious.

Indirect costs are, to some extent, hidden. They include:

- direct time loss - time lost by those injured as well as other employees and supervisors;
- indirect time loss - time lost hiring and training new or replacement employees, preparing reports, attending hearings or rescheduling production; and
- contingency costs - inability to fill orders, loss of customers, and employee good will.

An effective Accident Prevention Plan Program can substantially reduce these indirect costs.

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Program Guide

This guide provides Accident Prevention Plan Program background information. It also outlines and describes the basic components of an Accident Prevention Plan, which you should have in place to manage your program. Information is provided on available assistance from the Texas Department of Insurance/Division of Workers' Compensation (DWC), Workers' Health & Safety and your workers' compensation insurance carrier (if applicable).

“How To”

Seven component guidelines are provided covering management, accident investigation, safety training, inspections, safety analysis, record keeping, and program review. Sample forms and a checklist are provided for each subject. The guidelines explain how to effectively develop and perform each program component.

Call or Write For Assistance

If you have a particular accident prevention problem or need additional assistance with a special accident prevention situation not covered in these materials, contact TDI/DWC Workers' Health & Safety and your workers' compensation insurance carrier for help. A Division phone listing is provided in this guide. Contact your insurance agent to obtain the address and phone number of your insurance carrier's local loss control office.

The Bottom Line

The end result will depend on what you do with this guide - how well you implement your Accident Prevention Plan and manage your programs.

Management

Consolidated Checklist

For your convenience a consolidated checklist to be used during the course of reviewing all 7 components is available in this guide.

Experience has shown that sincere commitment and active participation by management are necessary if an Accident Prevention Program is to achieve beneficial results. When management demonstrates genuine interest in preventing accidents and providing a safe workplace, supervisors and employees are more likely to do the same.

Establish Accident Prevention Goals

An Accident Prevention Program is more likely to accomplish the desired results when safety goals have been clearly established. Goals should give a clear understanding of what you expect, should be realistic, and should be easy for your accident prevention coordinator to measure. For example, if your operation has a high accident experience, a realistic and quantitative goal may be to reduce accident frequency by 25% during the next year. Safety goals should be established for every organization, regardless of size.

Management Participation

Management should demonstrate active participation by translating ideas into specific safety actions such as:

- issuing a written statement of a safety policy;
- providing realistic allocations of time and money for safety items;
- assigning responsibility and authority for implementing and enforcing your Accident Prevention Plan;
- reacting promptly to recommendations developed as a result of the Accident Prevention Program, suggestions, complaints, etc.; and
- attending safety talks and meetings.

Written Safety Policy

Your first step is to prepare a safety policy statement to develop employee awareness and involvement.

You must set a good example and communicate your intent to all employees. To do this, write a short statement of safety policy, sign it, and place it in a visible location for all to see and refer to. A sample safety policy could be:

“It is the intent of this company to provide a safe place for you to work. Accident and injury prevention is an important part of my job and yours. Working together, we can achieve our goal of safety. Your ideas and safe working practices are important. Make safety everyone's responsibility. I have appointed the vice president as the safety officer. The safety officer will be

responsible for development and implementation of the Accident Prevention Plan. Supervisors or branch managers will be responsible for enforcing the plan and established safety procedures.”

Required Posters

As an employer you are required by local, state and federal agencies to display these informational posters:

- Notice 5 – *For Employers Who Do Not Have Coverage*
- Notice 6 – *For Employers Who Do Have Coverage*
- Notice 7 – *For Employers Who Are Self-insured*

These notices are available by calling the Division at 512 804-4333. Notices 5 and 6 also can be downloaded from the Texas Department of Insurance web site at <http://www.tdi.state.tx.us>

Occupational Safety and Health Administration (OSHA)

The Occupational Safety and Health Act of 1970 poster is available at OSHA area offices upon request. These posters are available in:

- Austin (512) 374-0271
- Corpus Christi (512) 888-3420
- Dallas (972) 850-4145

- El Paso (915) 534-6251
- Fort Worth (817) 428-2470
- Houston (281) 591-2438; or (281) 286-0583
- Lubbock (806) 472-7681

Other Posters

Contact the regulatory agencies governing your particular industry for specific posting requirements. Get professional legal advice when in doubt about legal obligations.

* An expanded poster list, including the above, is provided in the Accident Prevention Help section of this guide.

Management Checklist		
	YES	NO
1. Have you established a written policy statement?	<input type="checkbox"/>	<input type="checkbox"/>
2. In the policy statement or under a separate heading have you appointed by position an individual(s) who will be responsible for:		
a. Accident Prevention Plan development?	<input type="checkbox"/>	<input type="checkbox"/>
b. Implementation of the Plan?	<input type="checkbox"/>	<input type="checkbox"/>
c. Enforcement of the Plan?	<input type="checkbox"/>	<input type="checkbox"/>
3. Have you displayed all required TDI/DWC and OSHA posters?	<input type="checkbox"/>	<input type="checkbox"/>

Record Keeping

Record keeping is a necessary function of managing your Accident Prevention Program. Records provide written documentation of your actions and assist in administering your program components as well as meeting local, state, and federal requirements.

Why Should You Keep Records?

There are many reasons for keeping records.

- Employers with more than 10 employees, including temporary contracted employees at any given time in a year, are required by the Occupational Safety and Health Administration (OSHA) to maintain records.
- Employers with 10 or fewer employees must maintain records if asked to participate in the Bureau of Labor Statistics’ annual survey of occupational illnesses and injuries.

- Texas Department of Insurance Rule 120.1 requires all employers covered under workers’ compensation insurance to keep injury records.
- Records are a source of support for managing your safety program. You need the records to conduct or carry out other safety program components.
- Records may be needed as evidence in legal proceedings or other evidentially proceedings.
- Small employers must report fatalities or accidents resulting in the hospitalization of three or more employees.
- States may also extend record keeping requirements to all employers regardless of size.

For assistance see “Workers’ Health and Safety Assistance” under the Accident Prevention Help section of this guide.

Management Actions

Management is responsible for designating what records are kept, who will keep the records, and where and for how long the records will be maintained. Five years is the recommended time period for maintaining records unless otherwise required by specific regulations.

Types and Forms of Records

Certain prescribed formats for occupational injury and illness records should be used if you have more than 10 employees. These forms can be obtained from your nearest OSHA Office or Bureau of Labor Statistics Office.

Where no specific form is required, the record can be of your own design as long as it contains all the pertinent information required by OSHA.

The Commission requires covered employers to maintain accident and injury records for their employees. You may use the OSHA 300 form to meet this requirement.

Reporting Forms:

OSHA Form 300	Log of Work-Related Injuries and Illnesses
OSHA Form 301	Injuries and Illnesses Incident Report
DWC-1	Employer's First Report of Injury
DWC-6	Supplemental Report of Injury
DWC-7	Non-Covered Employer's Report of Occupational Injury or Illness

For assistance see "Workers' Health and Safety Assistance" under the Accident Prevention Help section on page 18 of this guide

Record keeping Checklist	YES	NO
1. Have you designated a person to maintain your records?	<input type="checkbox"/>	<input type="checkbox"/>
2. Have you stipulated what records will be kept?	<input type="checkbox"/>	<input type="checkbox"/>
3. Have you stipulated where your records will be maintained?	<input type="checkbox"/>	<input type="checkbox"/>
4. Have you indicated how long you will keep the records?	<input type="checkbox"/>	<input type="checkbox"/>
5. Have you determined what forms will be used to document injury records?	<input type="checkbox"/>	<input type="checkbox"/>

Safety Analysis

A safety analysis is a means of studying data to determine trends or identify problem areas. It allows you to concentrate on areas of your business that pose the greatest threat to the health and safety of your employees.

Two types of analysis are provided:

- **Trend Analysis** — This analysis is used to identify trends indicated by statistical data gathered from other program components. By keeping accident and injury data you can identify particular types of injuries (back injuries), and the causes of those injuries (improper lifting or that they occurred during lifting operations). Inspection data can reveal problem areas or particular hazards that continually reoccur.

The trend analysis may indicate the need for additional training, new procedures, or engineering controls to eliminate the problem(s).

- **Job Safety Analysis (JSA)** — is a means for identifying the hazards associated with a task and applying measures to protect the employee, or to eliminate or control the hazard.

What Is Included in the Analysis Component?

To formulate the analysis component, you need to establish in writing:

- who (by position) is responsible for conducting the analysis;
- what type of analysis will be conducted;
- how often the analysis will be conducted (quarterly, semiannually, annually); and
- what data will be analyzed.

Why Conduct a Safety Analysis?

Every company is in business to make a profit. Mistakes or errors that result in damaged products, production delays, or employee accidents affect profits. A simple system of job analysis can help you obtain maximum efficiency, safety, and profits.

What Is a Trend Analysis?

A trend analysis is a review of statistical data that reveals trends, favorable or unfavorable, that occur as a result of administering your accident prevention program.

It will also identify specific areas where you need to target your accident prevention efforts. You will want to concentrate on turning unfavorable trends into favorable trends.

How Is It Conducted?

To conduct a Trend Analysis, you must:

- select the data to be analyzed (accident injury data, of hazard identified during inspections, etc.);
- determine a time period the analysis will cover (monthly, quarterly, or semiannually);
- identify similarities in data (three out of four accidents involved in back injury, all injuries from same work area, three out of four involved same work activities, same hazards identified during inspections); and
- develop corrective measures to stop the unfavorable trends.

What Is a Job Safety Analysis?

A job safety analysis is a review of job methods that identifies hazards and, with corrective action, results in a safer and more efficient way to do a job. The term “job” refers to the steps or activities involved in a person’s occupation. Once job hazards are discovered, proper solutions can be developed.

Some solutions take the form of physical changes that minimize or control job hazards; for example, using machine guards. Other solutions can consist of changes in job procedures that eliminate or minimize hazards; for example, piling materials more safely.

All factors such as quality control, production and safety must be included in the analysis because all of them contribute to a more efficient operation.

How Should a JSA Be Made?

A JSA consists of four basic steps.

1. Select the job to be analyzed.
2. Break the job down into successive steps.
3. Identify the hazards and potential accidents.
4. Develop ways to eliminate the hazards and prevent potential accidents.

Now What?

Use a job safety analysis for training new employees and noting deficiencies in jobs. Conduct a review if an accident occurs. Most importantly, follow-up in all areas for effective use.

Select the Job to Be Analyzed

Use the following as a guide to select a job for analysis:

- frequency of accidents;
- disabling injuries;
- potential of injury; and
- new operations.

Break the Job Down

- select a competent person to observe;
- explain the purpose of the analysis;
- observe the person as the job is performed;
- record each step on a form similar to the enclosed sample; and
- review the analysis with the employee and seek comments.

Identify the Hazards

- striking against, being struck, or other injurious contact;
- being caught in or between;
- slipping or tripping;
- straining, pushing, pulling, reaching, twisting, or lifting; and
- gases, fumes, mists, or dusts that are hazardous.

Develop Ways to Eliminate Hazards

- find a new way to do the job;
- change the physical conditions that create hazards;
- eliminate hazards still present, change the job procedure; and
- reduce the necessity or frequency of a job.

For assistance, see “Mandatory Written Programs” on page 20.

Analysis Checklist	YES	NO
1. Has an individual been appointed to conduct the analysis?	<input type="checkbox"/>	<input type="checkbox"/>
2. Has the type of analysis been identified?	<input type="checkbox"/>	<input type="checkbox"/>
3. Have you established a time frame the analysis will cover (quarterly, semiannually, annually)?	<input type="checkbox"/>	<input type="checkbox"/>
4. Has the date for analysis been identified?	<input type="checkbox"/>	<input type="checkbox"/>

Health & Safety Training

Employee training is your most valuable accident prevention tool to develop employee safety awareness. Through training, your employees learn to recognize and eliminate hazards.

Many accidents can be avoided if the employees are shown safe work practices and made aware of the hazards of the job. The following may be helpful:

The Supervisor

Your own supervisors are the key to any accident prevention program, and with your support and guidance they can have a direct impact on the reduction of workplace accidents.

The New Employee

New employee orientation should include safety information. Give the new employee a tour explaining the operation, the processes, and any equipment. Explain any hazards that could lead to injury and the safety precautions to prevent injury.

When developing the safety and health training component of your Accident Prevention Plan, keep in mind that the plan is your written guide to implement your safety program. Establish in writing:

- who will be responsible for conducting the training;
- how often training will be conducted;
- a sample listing of training topics; and
- a list of topics and areas to be covered during new employee orientation.

Why Employee Safety Training?

Statistics indicate that most accidents are caused by unsafe acts rather than unsafe conditions. However, many accident prevention efforts are geared to eliminate only unsafe conditions. Many times an unsafe act would not have been committed if the employee had been shown the hazards involved in a job, as well as safe procedures to avoid them. Employee safety training is an answer to controlling unsafe acts.

Who Needs Training?

Everyone needs training. New employees need training to get off on the right foot. Existing employees who change jobs require training to perform their new jobs more efficiently and safely. Employees assigned to any activity that requires lifting and handling need training, even when relatively light loads are involved. Supervisors need training in safety management techniques such as how to analyze jobs to identify unsafe acts and conditions. Retraining all employees at various times is necessary to reinforce safety procedures.

When Should You Train?

Safety is a matter of attitude. Attitudes can be created or changed by an effective training program. For new employees, don't wait. Start their training right away. Retrain existing employees periodically and back up the training with reminders for effective results. For example, safety slogans such as "Every Day Is Safety Day" may be posted on bulletin boards.

What Is Included in New Employee Safety Orientation?

Remember, this is your first opportunity to influence the attitude of your employees.

- Discuss the company's safety policy and dedication to a safe and healthful work environment.
- Provide a copy of safety rules and procedures to employees, and discuss any questions or particular items of interest with the employee (accident reporting, hazard reporting, etc.).
- Discuss your Accident Prevention Plan with the employees.
- Supply employees with any personal protective equipment needed to perform the job. Include instructions on its proper use and maintenance.
- Discuss and provide training on any specific hazards of the employees' jobs. A JSA is a good tool to help prepare and present this training.
- Take employees on a tour of your company and point out areas and operations particular to the job.

What Is Included in Employee Safety Training?

This is your opportunity to reinforce positive safety attitudes in your employees.

- Include briefings, videos, discussions, informal talks, etc., on topics that affect their safety and health.
- Discuss any procedural or operational changes.
- Acquaint employees with new equipment or machinery, any hazards, or special safety precautions associated with their operation.
- Discuss corrective actions for identified hazard(s), trend(s), and accident causes.

Job Instruction

The efficiency of your business depends on how well your employees understand and carry out their jobs. Train them the right way by:

- analyzing the task and its hazards;
- putting the employee at ease;
- showing employees exactly what has to be done to perform efficiently and safely — explain each step;

- watching employees demonstrate the task — explaining each step back to you; and
- following up — check employees’ performance from time to time.

The extra time it takes to make sure employees understand their job will pay for itself later on.

Accident Prevention Talks

Another sure method of maintaining a safety conscious workforce is by holding periodic and informal accident prevention talks. Select timely subjects based on recent accidents, season of the year, conditions, particular jobs, operations, etc. Make the talk short and to the point. Encourage employee comments and participation in finding safer ways to work.

Safety Hints

Occasional reminders or safety hints on an individual basis reinforces each employee’s overall awareness. This is an effective way to motivate employees by showing your concern for their safety. For assistance, see “Workers’ Health & Safety Assistance” under the Accident Prevention Help section on page 18.

Seven Steps to Training

Step 1 - Determine If Training Is Needed

Training is often considered the answer to all problems. However, not all problems lend themselves to being solved by training. Before training, determine whether other alternatives would be more effective. Is it better to train equipment operators to keep their hands free or install guards?

Step 2 - Identify Training Needs

Once the need for training has been established, then determine the employees’ hazard exposures.

Step 3 - Identify Goals and Objectives

Next, specify what you want employees to gain from the training and how you will evaluate the results.

Step 4 - Develop Learning Activities

Select and design the activities that will enable trainee(s) to reach the objective.

Step 5 - Conduct the Training

Select whatever training method you have determined will be most effective and conduct the training.

Step 6 - Evaluate Program Effectiveness

Verify that the training has accomplished the desired training objective.

Step 7 - Improve the Program

Review the training program and make any changes needed to ensure your required results. New equipment, procedures, and identified hazards require changes in your training program. Your training program should include training on hazard control measures to protect employees.

Safety & Health Training Checklist		
	YES	NO
1. Has an individual responsible for conducting training been appointed?	<input type="checkbox"/>	<input type="checkbox"/>
2. Have you stipulated how often training will be conducted?	<input type="checkbox"/>	<input type="checkbox"/>
3. Has a sample listing of training topics for all employees been created?	<input type="checkbox"/>	<input type="checkbox"/>
4. Has the list of topics and areas to be covered during a new employee orientation been established?	<input type="checkbox"/>	<input type="checkbox"/>
5. Has training been documented?	<input type="checkbox"/>	<input type="checkbox"/>
6. Have employees signed attendance rosters?	<input type="checkbox"/>	<input type="checkbox"/>

Safety Inspection

A self-inspection program is a good way to detect unsafe conditions as well as unsafe acts that lead to accidents. Ask yourself what conditions or operations exist that could cause serious injury. Falls, lifting, reaching, twisting, being struck by an object, striking against, cuts, burns, etc., are just some of the ways employees are injured. Look for locations in your business where injuries have occurred or could occur. Knowing where and what to inspect is important. However, you and your supervisors should evaluate the conditions to perform a complete job. A self-inspection form is a helpful guide in identifying problem areas that need correction. Establish a schedule for regular inspections.

What to Include in an Inspection Component

As a small business owner you should identify:

- who will perform the inspection;
- how often inspections will occur;
- how the inspection will be recorded; and
- who is responsible for reviewing the reports and corrective actions.

Why Conduct Safety Inspections?

A well-planned safety inspection program helps you detect hazards before an accident occurs. Removing hazards through corrective actions increases operating efficiency. Using the proper approach, inspectors can convince employees of your concern for their welfare.

When Should Inspections Be Conducted?

Increased production, changes in operations, or installation of new equipment often creates new hazards, such as congestion, poor housekeeping, and other conditions that may contribute to employee accidents. Consider scheduling an inspection if any of these changes in conditions occur. In addition, a periodic inspection program should be established weekly, monthly, or quarterly and then followed up for the best results. It is up to you to determine how often inspections should be conducted.

What to Look For

Both unsafe acts and unsafe conditions contribute to employee accidents. Therefore, these factors should receive special attention. Check your accident record for location and causes of accidents so these can be verified on your inspection. Use an inspection checklist to assist you and add additional items if necessary. A sample checklist is provided at the end of this section to assist you in developing your own.

What Should Be Done?

An effective inspection program must be based on knowledge of the regulations applicable to each operation. The regulations should be available to those performing inspections and developing recommendations. Specifically, OSHA regulations – Code of Federal Regulations (CFR) 1910 for general industry and CFR 1926 for construction - should be available. Information on obtaining standards can be received by calling Publications at OSHA's Regional Office in Dallas, (972) 850-4145. Publications containing standards, checklists, and technical data that you may find helpful are available from the American National Standards Institute, the National Fire Protection Association, and the National Safety Council. It is important to remember that governmental regulations establish only minimum requirements. To ensure that your safety objectives are met, you may want to exceed the minimum requirements.

Check for Unsafe Acts Such As:

- horseplay;
- failure to use personal protective equipment;
- making guards or safety devices inoperative;
- using improper tools or equipment;
- lifting improperly;
- using defective tools or equipment;
- operating equipment at unsafe speeds;
- insecure or disorderly piling of materials; and
- using equipment without authority.

Check to Be Sure That:

- floors are in good condition, free of loose boards, holes, or slipperiness;
- aisles are clear and free of tripping hazards;
- machines are guarded (point of operation, gears, belts, etc.);
- clean and orderly housekeeping is maintained;
- lighting is sufficient for safe operation;
- storage areas are properly piled within recommended limits;
- electrical equipment, wiring, and fusing is to standards with no frayed wires, open boxes, or ungrounded devices; and
- ladders are of standard construction and in good condition, sufficient for your needs.

These are only some of the important safety conditions to check for in your business operations. Add other items that are relevant to your business.

Documentation

Copies of the completed checklist used to conduct the inspection should be maintained along with a list of actions taken to correct any unsafe acts or conditions identified.

Accident Reporting & Investigating

What Should Be Included?

Develop employee accident reporting criteria

- Report any accident, no matter how minor the injury, or if only property damage occurs.
- Indicate to whom the accidents are to be reported (supervisors, shop chiefs, foreman, etc.)

Identify employer accident reporting criteria

- The Commission requires any occupational injury resulting in more than one day absence from work due to injury or death and any occupational illness be reported. Covered employers report using a form DWC-1 and non covered employers use a form DWC-7.
- OSHA requires that any fatality or accident involving hospitalization of three or more employees be reported within eight hours.
- OSHA (for employers with more than 10 employees) requires you to report all accidents that result from an exposure in the work environment and result in a death, an illness, or an injury, that meets any one of the following criteria:
 - requires medical treatment other than first aid;
 - results in loss of consciousness;
 - results in restriction of work or motion; or
 - leads to transfer to another job.

Accidents must be recorded on the OSHA Form 300. In addition, the employer must fill out an OSHA Form 301 incident report or an equivalent injury or illness record for each case. (A form DWC-1 does NOT meet this requirement.)

The above reporting requirements are subject to change. Contact the Divisions' Workers' Health and Safety for the latest information.

Develop guidelines for conducting accident investigations. Appoint a responsible person to conduct accident investigations.

Accident Investigation

Accident investigation is the process of recording what happened, who was involved, and the resulting injury. It is not conducted to place blame on any individual. It is, however, a means by which you can “zero-in” on the actual cause of the accident so that the necessary corrective action can be taken to prevent a recurrence.

When investigating an accident, use a standard form so that all aspects of the accident are covered. The following may be helpful:

- Investigate all accidents - even minor accidents may well have serious consequences another time;
- Investigate accidents as soon as possible after they occur while the facts are fresh in everyone's mind;
- Have the persons involved and any witnesses describe

Inspection Checklist

YES NO

- | | | |
|--|--------------------------|--------------------------|
| 1. Have you appointed a responsible person for conducting safety and health inspections? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Have you established how often inspections will be accomplished? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Have you stipulated how inspections will be recorded? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Have you determined who will be responsible for the review of inspection reports? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Have you conducted an inspection follow-up to ensure corrective action? | <input type="checkbox"/> | <input type="checkbox"/> |

the accident as they saw it;

- Avoid jumping to conclusions or placing blame;
- Take corrective action to eliminate the cause and prevent recurrence; and
- Follow-up later to see if the action was satisfactory.

When Should Accidents Be Investigated?

Every accident should be investigated as soon as possible after it occurs. If you wait, facts may be forgotten and evidence could be lost. Prompt investigations get the most complete and useful information. Investigations should take place at the scene of the accident.

Why Should Investigations Be Conducted?

Accidents don't just happen—they are caused. First, find out what caused the accident. Second, develop a plan of action to eliminate or control the cause. All accidents should be investigated, no matter how minor. Eliminating the causes of minor accidents can prevent serious accidents in the future.

Who Should Conduct Investigations?

The owner of the company should make the final decision on who conducts the investigation. Ultimately, the owner is responsible.

How Should Investigations Be Conducted?

Effective accident investigation skills are developed through experience. Basically, find out what caused the accident and what can be done to prevent its recurrence.

Some suggestions are:

- Check the site and obtain facts before anything has been changed;
- Discuss the accident with the injured employee as soon as possible after first aid or medical treatment has been

- given;
- Obtain facts from witnesses regarding the conditions and circumstances before and after the accident;
- Compile all facts, no matter how small, to assist you in arriving at the real cause; and
- Be objective - the purpose is to find the real cause, not someone to blame.

Now What?

Take the necessary corrective action to eliminate the cause and prevent recurrence. You haven't done a complete job if the cause of the accident is not eliminated or controlled.

- If employee failure was involved, make sure the employee is now properly trained. In addition, make sure to train other employees in similar operations.
- If the operation can be changed to eliminate the hazards, change it.
- Decide if equipment changes or guards are needed.

Seek assistance, if necessary, to obtain the proper type of device.

- Follow up on corrective actions to make sure they are effective.

For assistance see "Workers' Health & Safety Assistance" under the Accident Prevention Help section on page 18.

Accident Investigation & Reporting Checklist		YES	NO
1. Have you developed employer accident reporting requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Have you developed employee accident reporting requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Have you appointed (by position) a person to conduct accident investigations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Have you developed accident investigation guidelines covering how investigations will be conducted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Program Review

The Program Review will keep your Accident Prevention Program current and working efficiently and effectively to prevent accidents, injuries, and losses. It is your opportunity to fine tune your program and make adjustments. Conduct a thorough review of each component.

Ensure any new equipment, procedures or operations are incorporated into the appropriate components of your plan. Check your existing equipment procedures and operations to ensure that your current component guideline is meeting your safety needs. Make changes and adjustments in your plan where necessary, and don't forget to notify your workers of the changes.

Who Conducts This Review?

Management should designate who is best suited within the company to conduct the review of the Accident Prevention

Program.

When Is The Review Conducted?

Management should decide when the review is conducted; however, it is recommended that a review is done at least once each year.

Documentation

Document the results of your review and submit results for

Program Review Checklist		YES	NO
1. Has a person been appointed to conduct and document the Program Review?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Have you stipulated when the Program Review will be conducted (at least annually)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Accident Prevention Help

record keeping.

For assistance see "Accident Prevention Help" under Health and Safety Assistance and Other Mandatory Programs Section.

Workers' Health & Safety Assistance

For information about the program guide and training opportunities contact:

Texas Department of Insurance/Division of Workers' Health and Safety
 Safety Training Programs at

(512) 804-4610 or (800) 687-7080

If you have workers' compensation insurance coverage, your insurance carrier should provide accident prevention services and safety information for your accident prevention program.

These services include:

- safety educational materials that you can use to promote your accident prevention program;
- telephone consultations on your accident prevention program;

- survey of your business premises and operation;
- recommendations to help you control exposures;
- advice on accident prevention programs;
- analysis of accident causes and trends;
- training aids, programs and materials to assist in the control of exposures;
- industrial health and environmental services; and
- loss information to assist you in analyzing accident causes and in identifying accident trends.

Free Workplace Posters Employers Must Display

Various laws require employers to display several posters in the workplace. These posters are available free of charge from the following state and federal agencies:

Texas Department of Insurance/Workers' Compensation Division

The following required notices are available by calling the Division of Workers' Compensation at (512) 804-4333:

- Notice 5 – For Employers Who Do Not Have Coverage*
- Notice 6 – For Employers Who Do Have Coverage *
- * also available at www.tdi.state.tx.us
- Notice 7 – For Employers Who Are Self-insured

Equal Employment Opportunity Commission

The federal poster titled "Equal Employment Opportunity is the "Law"" meets the requirements of the Age Discrimination in Employment Act of 1967, Title VII of the Civil Rights Act of 1964, and the Americans with Disabilities Act. A poster is available from the regional EEOC Literature Department at 1-800-669-3362 or 1-800-800-3302 (TTY).

U.S. Department of Labor

The U.S. Department of Labor supplies three required posters. One explains the provisions of the Fair Labor Standards Act, another clarifies the Employee Polygraph Protection Act, and the third advises employees of their rights under the Family and Medical Leave Act. These posters are available in Corpus Christi at (361) 888-3420, in Dallas at (214) 767-6294, in Houston at (713) 339-5500, and in San Antonio at (210) 308-4515.

Occupational Safety and Health Administration

The Occupational Safety and Health Act of 1970 poster is available at area field offices upon request. You may contact these field offices by calling:

- Austin (512) 374-0271
- Corpus Christi (361) 888-3420
- Dallas (972) 850-4145
- El Paso (915) 534-6251
- Fort Worth (817) 428-2470
- Houston North (281) 591-2438

- Houston South (281) 286-0583
- Lubbock (806) 472-7681

Other Posters

Contact regulatory agencies governing your particular industry to ask about specific posting requirements. Get professional legal advice when in doubt about legal obligations.

Mandatory Written Programs

The following is a "quick" list of programs that may need to be written. The list does not include mandatory certifications, notices, etc., but, rather, focuses on plans or programs that contain procedures, policies, permission, etc. that must exist in written form.

1910.38	Emergency Action Plans.- Orally for employers with 10 or fewer employees
1910.66	Emergency Action Plan for Each Kind of Working Platform Operation
*1910.95	Occupational Noise Exposure— exempt; oil and gas well drilling and servicing; Hearing Conservation Program;
*1926.52	Process Safety Plan of Action — Highly Hazardous Chemicals; 1910.120 Hazardous Waste — Normal Procedures and Emergency Response;
1910.119	Respiratory Protection Program;
*1910.134	Confined Space Entry Procedures;
*1910.146	Lockout/Tagout Procedures;
*1910.147	Fire Brigade Procedures and Policies - do not apply to airport crash rescue or forest firefighting operations
1910.156	Housekeeping Program to reduce accumulated fugitive grain dust in grain facilities;
1910.272	Programs to reduce employee exposure where PEL is exceeded; emergency response programs for certain chemicals; and house-keeping programs for certain substances
Subpart Z	Bloodborne Pathogens Exposure Control Plan;
1910.1030	HAZCOM;
*1910.1200	HAZCOM;
*1917.28	HAZCOM;
*1918.90	HAZCOM;
1910.1450	Chemical Hygiene Plan for Hazardous Chemicals in Laboratories;
1926.1101	Asbestos Removal Plan — requires a certified individual with the plan
1926.60	Emergency Response Plan for Methylenedianiline Exposure
1926.1127	Cadmium Level Monitoring Plan and Emergency Response
TWCC	Drug Policy — if employer has 15 or more employees

* Minimum requirement programs are available from the Divisions' Workers' Health & Safety. Assistance is available for developing other required programs.

Consolidated Checklist

Management Checklist

- | | YES | NO |
|---|--------------------------|--------------------------|
| 1. Have you established a written policy statement? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. In the policy statement or under a separate heading have you appointed by position an individual(s) who will be responsible for: | | |
| a. Accident Prevention Plan development? | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Implementation of the Plan? | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Enforcement of the Plan? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Have you displayed all required TDI/DWC and OSHA posters? | <input type="checkbox"/> | <input type="checkbox"/> |

Safety & Health Training Checklist

- | | YES | NO |
|---|--------------------------|--------------------------|
| 1. Has an individual responsible for conducting training been appointed? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Have you stipulated how often training will be conducted? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Has a sample listing of training topics for all employees been created? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Has the list of topics and areas to be covered during a new employee orientation been established? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Has training been documented? | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Have employees signed attendance rosters? | <input type="checkbox"/> | <input type="checkbox"/> |

Record keeping Checklist

- | | YES | NO |
|--|--------------------------|--------------------------|
| 1. Have you designated a person to maintain your records? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Have you stipulated what records will be kept? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Have you stipulated where your records will be maintained? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Have you indicated how long you will keep the records? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Have you determined what forms will be used to document injury records? | <input type="checkbox"/> | <input type="checkbox"/> |

Accident Investigation & Reporting Checklist

- | | YES | NO |
|--|--------------------------|--------------------------|
| 1. Have you developed employer accident reporting requirements? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Have you developed employee accident reporting requirements? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Have you appointed (by position) a person to conduct accident investigations? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Have you developed accident investigation guidelines covering how investigations will be conducted? | <input type="checkbox"/> | <input type="checkbox"/> |

Analysis Checklist

- | | YES | NO |
|---|--------------------------|--------------------------|
| 1. Has an individual been appointed to conduct the analysis? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Has the type of analysis been identified? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Have you established a time frame the analysis will cover (quarterly, semiannually, annually)? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Has the date for analysis been identified? | <input type="checkbox"/> | <input type="checkbox"/> |

Program Review Checklist

- | | YES | NO |
|---|--------------------------|--------------------------|
| 1. Has a person been appointed to conduct and document the Program Review? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Have you stipulated when the Program Review will be conducted (at least annually)? | <input type="checkbox"/> | <input type="checkbox"/> |

Inspection Checklist

- | | YES | NO |
|---|--------------------------|--------------------------|
| 1. Have you appointed a responsible person for conducting safety and health inspections? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Have you established how often inspections will be accomplished? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Have you stipulated how inspections will be recorded? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Have you determined who will be responsible for the review of action is carried out and effective? inspection reports? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Have you conducted an inspection follow-up to ensure corrective action? | <input type="checkbox"/> | <input type="checkbox"/> |

Workers' Health & Safety

Several safety title videos are available from the Division Resource Center.

Accident Prevention Programs

Our programs are divided into different training areas. They progress from an introductory level designed for supervisors to complete training programs utilizing Commission personnel. Our beginning level of training is the Factsheet or general knowledge level. Next is our "Take 5 for Safety" leaflet. This is a quick "break room" style of training used to familiarize employees with a specific injury prevention topic. The following are samples of Take 5 publications available in this format:

Machine Guarding
Personal Fall Protection Systems
Safe Lifting Techniques
Slips and Falls

Next are Safety Training Publications (STPs). These publications are useful in developing and conducting safety meetings and programs at the safety manager/trainer level to employees. The following are samples of STPs:

Accident Investigation
Asbestos Safety
Bloodborne Pathogens
Confined Spaces
Excavation Safety
Eye Protection
Farm Safety

Hazard Communication
Hazardous Energy Control Management Responsibilities
Material Safety Data Sheet
Protective Headgear
Workplace Violence Prevention

Workplace Program Guides are the next level of training. They provide expanded information about specific injury prevention. The following are samples of guides available:

Drug-Free Workplace
Excavation Safety
General Ergonomics
Manual Material Handling
Personal Protective Equipment
Workplace Emergencies

Finally, Workers' Health and Safety offers training by our safety training specialist in the following programs: NOTE: this is only a partial list.

Accident Prevention Planning
Ergonomics
Bloodborne Pathogens
Lockout-Tagout
Accident Investigation
Confined Space
Farm Safety
Hazard Communication
Workplace Violence Prevention
Drug-Free Workplace

Safety Resource Phone Numbers

Texas Department of Insurance/ Division of Workers' Compensation

Customer Service	(512) 804-4636
Customer Service fax	(512) 804-4101
Field Services	(512) 804-4150
Hearings	(512) 804-4010
Medical Review	(512) 804-4800
Medical Review fax	(512) 804-4801
Medical Dispute Resolution	(512) 804-4812
Self Insurance Regulation	(512) 804-4775
Workers' Health & Safety	(512) 804-4600
DWC Resource Center	(512) 804-4620
Safety Violations Hotline	(800) 452-9595
Health and Safety Request Line	(800) 687-7080
Texas Alcoholic Beverage Commission tabc.state.tx.us	(512) 206-3333
Texas Department of State Health Services dshs.state.tx.us	(512) 458-7111

Texas Department of Public Safety txdps.state.tx.us	(512) 424-2000
Texas Commission on Environmental Quality tceq.state.tx.us	(512) 239-1000
Occupational Safety and Health Administration Region 6 - Dallas, Texas osha.gov	(972) 850-4145
National Safety Council nsc.org	(800) 688-7458
Texas Safety Association texas-safety.org	(800) 688-1005
Greater San Antonio Safety Council	(210) 824-8180
National Fire Protection Association nfpa.org	(800) 344-3555
National Institute of Occupational Safety & Health cdc.gov/niosh/ homepage.html (800) (356-4674)	(800) 35NIOSH
American National Standards Institute ansi.org	(202) 293-8020



Accident Prevention Plan
Worksheet

Provided by
Workplace Safety

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Management Policy Statement

The president and management of _____ are committed to providing a safe and healthful work environment for all our employees and others that may work, visit, or enter our facilities.

It is our policy to manage and conduct operations and business in a manner that offers maximum protection to each and every employee and any other person that may be affected by our operations and business.

It is our absolute conviction that we have the responsibility for providing a safe and healthful work environment for our people and all others that may be affected as we conduct our business.

We will make every effort to provide a working environment that is free from any recognized or potential hazard.

We recognize that the success of a safety and health program is contingent and dependent upon support from the executive level of management down to involvement of all employees of the company.

The management of this company is committed to allocating and providing all the resources needed to promote and effectively implement the Accident Prevention Plan.

This company will establish avenues to solicit and receive comments, information, and assistance from employees about safety and health.

This company will comply with all federal, state, and local safety and health regulations.

Company management and designated supervisors will set an example of commitment to safety and health at this company.

This policy applies to all employees and persons affected or associated in any way by the scope of this business.

President

Authority & Accountability

The _____ (title) of _____ (company) accepts the responsibility for providing resources and guidance for the development and implementation of the safety and health program.

The _____ (title) is responsible and will be held accountable for the overall implementation of the working plan. The _____ (title) has the authority to delegate any or all portions of the plan to subordinates but will be held responsible for the performance of the plan. The _____ (title) also has the authority to approve or carry out disciplinary actions against those that violate policies, procedures, or rules.

The _____ (title) is/are responsible and will be held accountable to ensure that all employees under their control follow all safety and health policies, procedures, and rules established by the company. They are also responsible for administering training and guidance to employees under their direction. The _____ (title) has/have the authority to reprimand and recommend disciplinary actions

against employees that violate the safety and health policies of the company.

Employees are responsible and will be held accountable for providing this company with a commitment to the safety and health program, abiding by the policies, procedures, rules set forth by the program, and becoming actively involved in the program to assist in providing a safe and healthful workplace for all involved.

Employees are encouraged to communicate their safety and health concerns with management to implement changes in our program where needed to reduce injury exposures in the workplace.

Contractors that provide or perform services for this company, at any location, are responsible to ensure that all employees' actions and services delivered are in a manner consistent with our commitment to safety and health. The

Accident Prevention Plan will be made available to all contractors for review.

Record Keeping

_____ (company) believes that the only valid means of reviewing and identifying trends and deficiencies in a safety program is through an effective record keeping program. The record keeping element is also essential in tracking the performance of duties and responsibilities under the program.

This company is committed to implementing and maintaining an active, up-to-date record keeping program.

Injury and Illness Data

The _____ (title) will maintain records of all work-related injuries and illnesses to our associates or employees.

The following records are applicable only to work-related injuries and illnesses.

Applicable forms or records:

- OSHA 300, Log of Work-Related Injuries and Illnesses or equivalent if required;
- OSHA 301, Injuries and Illnesses Incident Report or equivalent if required;
- Texas Department of Insurance/Division of Workers' Compensation
 - DWC-1, Employer's First Report of Injury
 - DWC-7, Non-Covered Employer's Report of Occupational Injury or Illness; and
- record of first aid or other non-recordable accidents/incidents.

The OSHA 300, Log of Work-Related Injuries and Illnesses or an equivalent record will be maintained at each work or job site. The OSHA 301 Injuries and Illnesses Incident Report or an acceptable substitute will be established, bearing a case number correlating with a case identifier on the OSHA 300 log and all pertinent and required information. The information contained in or entered on these records will be maintained current within seven calendar days after a recordable accident is reported. If an OSHA 300 is not required and not kept, an injury record must be kept to satisfy Division Rule 120.1. The OSHA Form 300A Summary of Work-Related Injuries and Illnesses will be posted in a conspicuous location for employee review no later than February 1, for the previous calendar year and will remain in place until April 30.

All data pertaining to injuries or illnesses that did not require medical treatment or were otherwise not recordable on the above-mentioned documents will be maintained in written record form. This will include first aid treatment of any kind. All injury and illness documentation will be reviewed annually in January by management and supervisors to analyze occurrences, identify developing trends, and plan courses of corrective actions.

These records will be maintained a minimum of five years or as required by law.

Safety & Health Surveys & Inspection/Program

The _____ (title) will maintain and review records of all safety audits and inspections that are conducted within or that affect the company, our employees, or facilities. Applicable forms and records:

- comprehensive survey reports and records of action taken; and
- documented checklists of self-inspection and records of action taken.

Reports generated as a result of comprehensive surveys conducted by outside professional agencies will receive immediate attention and consideration. All hazards identified and recommendations will be acted upon in a timely manner. All methods of addressing the issues contained in the reports will be documented in writing and a copy maintained with the survey report. This documentation will also show the date corrections were made or actions taken.

These reports and all associated documentation will be maintained for record and periodic review. Members of management that receive these reports will ensure the corrective actions are taken.

Checklists will be developed as part of the periodic self-inspection process. Checklists will be used and maintained including the name of the person performing the evaluation and the date the inspection takes place. The self inspection checklists will be reviewed by management upon completion. All discrepancies identified during the survey will be evaluated as soon as possible. The periodic self-inspection checklists will be reviewed and evaluated on a regular basis to ensure current applicability. This review will be performed throughout the workplace with input from supervisors and employees. The checklist will be retained along with other applicable data for review. The list will be developed with the assistance of professionals providing comprehensive surveys (insurance field safety representatives, local fire inspectors, the Commission, etc.). The hazards and recommendations noted in the comprehensive surveys will be given consideration for addition to the periodic self-inspection checklist. Area supervisors will be responsible for requisitioning and assisting in the correction process.

The formal Accident Prevention Plan components will be reviewed in **January each year** to identify insufficiencies or component failure. Each will be audited individually with the findings documented and recorded. This documentation will be used to identify trends in the program element deficiency and to track improvement modifications. This documentation will be maintained for review.

Safety or Other Related Meetings

The _____ (title) will maintain accurate records of all proceedings associated with the safety and

health program of this company.

Applicable forms and records:

- minutes, records, and data resulting from safety meetings or other gatherings in which discussion occurs that affects the safety and health program.

Keep a record of all proceedings and appropriate management or other designated staff actions affecting the safety and health program. These records will include the name of the recorder, date, a list of attendees, details of the topics discussed, and action or corrective measures suggested, recommended or taken. The purpose of these is to ensure that decisions affecting the safety and health program of this company are carried out, implemented, and that results are tracked.

Designate a recorder who will be responsible for the minutes or records at each meeting. During each subsequent meeting, the record of minutes for the previous meeting will be reviewed, discussed, resolved, and the document closed with an authorized signature.

Training Records

The _____ (title) will document and maintain records of all safety- and health-related training.

Applicable forms or records:

- training documentation records.

All safety and health related training provided to employees of this company will be documented. This documentation will be maintained as proof of attendance and reviewed to assist in determining the need for additional or repeated training for employees on an individual basis. Records and documentation of training will include the presenter's name, date of training, topic or subject, legible identification of the attendee, and attendee's signature. The person providing the training is responsible for generating the documentation. The training record will become part of the employee's permanent file and will be maintained by

_____ (title) for a minimum of 5 years or as required by law.

Accident Investigation

The _____ (title) will ensure proper records and documentation of all accident and incident investigation activities are maintained and reviewed.

Applicable forms and records:

- accident investigation forms and supporting data including photographs; and
- records of corrective action or preventative measures implemented.

All accidents and near miss incidents resulting in injury or illness to a person, property damage of any magnitude, or the potential for either, will be investigated and documented.

All items on the designated accident investigation form will be

addressed in detail as soon as possible following the accident/incident. The information acquired will be used and reviewed by management, supervisors, and effected employees to establish all contributing factors and causes. From the investigation, a plan of corrective action will be established to prevent recurrence of the mishap.

The plan of corrective action and implementation will be documented and reviewed by management.

Employees involved in any incidents/accidents will be interviewed to learn how to prevent any future recurrences. The investigations are to find out the facts, not to place blame. Any suggestions employees may provide on how to prevent future incidents or accidents are encouraged.

Equipment Inspection & Maintenance

The _____ (title) will maintain records and data pertaining to equipment inspection and maintenance programs performed at or with each facility for a minimum of

5 years or as required by law.

Applicable forms and records include:

- routine inspection and maintenance records;
- documentation of services performed by contract agreement; and
- documentation of repair and replacement of parts or equipment.

Accurate records will be maintained involving all routine inspection and maintenance procedures performed on equipment at this company. This documentation will be reviewed periodically by those responsible for maintaining equipment and facilities. The documentation will be utilized to determine an effective, ongoing equipment maintenance program and to ensure compliance with regulations that require inspections on certain equipment.

Analysis

The _____ (title) of _____ (company) will review and analyze all records and documentation pertaining to the safety and health program. This review will be conducted on a _____ (frequency) basis and will focus on hazard and injury analysis, and recognition of developing trends.

Trend analysis will identify recurring accidents and near-miss incidents resulting in or potentially involving, injury, illness, or property damage. The analysis will also recognize repeatedly identified hazards/violations needing corrective action to establish what program component is failing that allows the hazard to exist.

The _____ (title) will provide information and recommendations for corrective measures for trends developing in their areas. Employees will be made aware of developing trends and hazard exposures as they are recognized. Employees will be contacted to provide their input on the methods they think would be successful in reversing any identified negative trends. Trends of accidents or hazard recurrences will be a focal point for corrective action and employee training as needed.

The _____ (title) will follow up on corrective measures at each location until the causal factor has been eliminated or controlled.

Employee training records will be reviewed annually in the month of _____ to ensure an adequate and effective training program is maintained. Employees will be interviewed from time to time to establish retention of training

and determine when information should be supported or repeated.

Safety & Health Training

_____ (company) is committed to providing safety and health related orientation and training to all employees at all levels of the company. The _____ (title) will develop, implement, and maintain an aggressive safety and health orientation and training programs. The program's purpose is to educate and familiarize employees with safety and health procedures, rules, and work practices of the facility. The management of this organization will encourage and require involvement and participation of all managers, supervisors, and employees. Furthermore, the executive level will support the orientation and training program with allocations in funding, staff, resources, and time to develop and implement this program.

Training Program Development

The training subjects and materials are developed utilizing industry and site specific criteria relating to identified and potential hazards, accident and incident data, and training required by federal regulations. The orientation, and subsequent training sessions will include, but not be limited to, the following:

- hazards associated with the work area;
- hazards of the job or task assignment;
- emergency procedures;

- personal protective equipment;
- hazard communication (hazardous chemicals and materials);
- specific equipment operation training;
- employee reporting requirements;
- accident investigation (supervisors and other designated personnel);
- confined space entry; and
- any federally required training not included or addressed above.

The training program shall be administered in two phases consisting of new employee or reassigned orientation and regular periodic training and refresher sessions.

Aside from the formal safety and health related training classes, employees will receive guidance and instruction on safe operating procedures of each assigned job or task. Employees are expected to provide feedback or to communicate with management on the usefulness or applicability of the training provided to them.

Orientation

The orientation training will be administered to all new employees prior to the initial work assignment and to employees assigned to new or different tasks or jobs.

The orientation will consist of all required training programs as well as job and site specific safety and health information. All new employees will be given a tour of the facility and an opportunity to pose questions to expedite the familiarization process. New employees will not be released to an individual job assignment until it has been determined by _____ (title) that the individual has retained the minimal acceptable elements of the training provided and pertinent information to safely perform the assigned duties.

Ongoing Training

All managers, supervisors, and employees are required to participate and become involved in the ongoing safety and health-training program. The frequency, repetitiveness, and subject matter will be determined by training assessments and audits to be performed by _____ (title) and will be at intervals that ensure demonstration of adequate training. The assessments and audits will, for the most part, be informal questions and observations of employees and work areas. At some point, a more formal survey, such as a written examination, may be required. At no time will an employee be approved to work at an interval greater than 12 months without retraining. All employees assigned to attend a training session must demonstrate competency and retention of the minimal acceptable information prior to returning to any job assignment. The _____ (titles) have the authority to assess training effectiveness and are responsible for enforcing implementation of criteria requirements of all training.

Documentation

Any and all safety and health related training administered or provided by _____ (company) will be documented with the following minimum information:

- date of training session;
- provider (name of person conducting training and affiliation, if not an employee of the company);
- subject matter;
- legible name of attendee(s) and supplemental identification if needed or required;
- signature or acknowledgement of attendance.

All training records and documentation will become a permanent part of each employee record as well as a master record used to determine participation of all employees.

Individual training records will be maintained for the current year plus 5 more.

Safety Audit/Inspection

The _____ (title) has implemented a program to identify, correct, and control hazards on an ongoing basis. This program will utilize multiple resources to ensure effectiveness.

Comprehensive Surveys

This company has arranged for each operating location to receive a comprehensive safety and health audit by _____ (title) on a regular basis — at least _____ (frequency). These audits will identify existing and potential hazards and noncompliance issues that should be addressed. The findings of the surveys will be dis-

cussed and recommendations for corrective actions suggested. Audits will also be conducted to evaluate the overall effectiveness of the Accident Prevention Plan and employee training. Recommendations will be made to enhance the performance of the safety and health program. Reports will be forwarded to management for review.

Safety and Health Self-Inspections

The _____ (title) at each operation location will conduct _____ (frequency) in-house safety and health self-inspections that will cover the entire facility and equipment. Employees will conduct constant informal inspections of their work areas and tools. If any potential exposures or deficiencies are identified, employees are expected to communicate these

to their supervisors if the employees are not able to rectify the situation immediately.

All inspections will be conducted on an ongoing basis without interruption. Management will allocate adequate time and resources to perform the surveys.

Each location will develop and maintain an inspection checklist specific to the operation. The list will be developed utilizing a general inspection checklist and will be evaluated and updated with hazards that are identified during the inspections and other pertinent data as it is acquired. The contents of this checklist will be reviewed on a regular basis to ensure that it is current and updated.

The checklist will become a part of the permanent record of the inspection and will serve as a confirmation of the audit.

Each checklist will indicate the location or specific site or area surveyed, name and title of the inspector, date of inspection, and corrective action taken for identified hazards or violations. The inspection report will be used in trend analysis and record keeping.

Employees must be notified of the hazards that pose an immediate threat of physical harm or property damage, and informed of measures or steps that will be taken to eliminate, correct, or control the hazard.

Management will review the inspection checklists and any other established documentation to ensure that a course of corrective action and time line has been established for eliminating each deficiency.

Accident/Hazard Investigation

Management is committed to and will correct or control all hazards identified through any of the avenues of recognition established. All identified hazards will receive a timely response.

Hazard Correction

Whenever possible and feasible, hazards identified at facilities will be corrected eliminating the cause of the hazard at the source. This will include, but not be limited to, the following:

- discontinuation or removal of hazardous chemicals, materials, or substances from the workplace;
- discontinuation from use or removal of hazardous equipment until replaced or repaired;
- correction of any unsafe acts or conditions in existence, by service or training.

Hazard Control

When identified hazards cannot be eliminated, the hazard will be effectively controlled by engineering, administrative procedures, work practices, personal protective equipment, or any suitable combination of these measures.

Engineering controls will include, but not be limited to, the following:

- isolation of employee exposure to the hazard;
- guarding or displacement of employee exposure to the hazard; and
- preventive maintenance and repair of machinery and equipment.

Administrative procedures will include, but not be limited to, the following:

- written programs to establish administrative guidelines for safe work practices; and
- established and implemented work rules and procedures.

Work practices will include, but not be limited to the following:

- careful planning and performance of each assigned job, duty, or task;
- reduction in duration of exposure to hazards; and
- adherence to safety and health rules and procedures.

Personal protective equipment will be the control of last resort when all other means of eliminating the hazards have not provided adequate protection to the employee.

When personal protective equipment is issued, the employee will be informed of the requirements, use, and limitations of the equipment.

Accident/Reporting Investigation

The _____ (title) will investigate all work related accidents and near miss incidents involving employees or company property to develop preventive measures and implement corrective actions.

Employee Reporting

All employees and associates are required to report to their immediate supervisor, any of the following:

- accidents/incidents with injury/illness of any magnitude (including first aid related cases);

- accidents/incidents resulting in property or equipment damage of any magnitude; and
- any near miss incidents that could potentially have resulted in injury/illness or property damage.

Employer Reporting

The _____ (title) will report the following accidents to local, state and federal agencies as required:

- Commission: Fatalities and accidents involving hospitalization of five or more injuries will be reported within 24 hours;
- OSHA: Fatalities and accidents involving hospitalization of three or more injuries will be reported within eight hours.
- Lost workday cases other than fatalities
- covered employers report to the Commission using form TWCC-1, Employer's First Report of Injury; and
- non-covered employers report to the Commission using form TWCC-7, Non-Covered Employer's Report of Occupational Injury or Illness.
- Nonfatal cases without lost workdays which result in transfer to other employment, require medical treatment other than first aid, involve loss of consciousness, or restriction of work motion. This category also includes any diagnosed occupational illnesses which are reported to the employer but are not classified as fatalities or lost workday cases.

The OSHA form 300 will be maintained as this company's recordable injury log. Nonrecordable injuries will be maintained on a separate log.

Accident Investigation

The _____ (title) will be responsible for conducting investigations of accidents that occur in their areas or that affect employees under their supervision. Upon notification of an accident or near-miss incident, the responsible supervisors will begin investigation to determine the following:

- how the accident or incident occurred;

- special circumstances involved;
- underlying, indirect, or associated causes; and
- corrective actions or preventive measures and controls.

Accidents and incidents involving situations where multiple supervisors are affected (an employee of one department injured in another) will be investigated jointly. The supervisor of the area where the incident occurred will be in charge of, and be held accountable for, the investigation.

Documentation

All activities and findings of the investigators will be documented and recorded for review.

Accident investigation documentation will record as a minimum, the following information is required for injury records per Commission Rule 120.1:

- date and time of occurrence;
- name of person involved, job title, area assigned;
- date of birth, sex, wage, length of service and social security number;
- location of occurrence;
- nature and severity of injury or illness;
- name of person conducting the investigation;
- name of immediate supervisor of employee;
- job assignment or duties being performed at time of incident;
- special circumstances or encumbrances;
- details of how the accident occurred;
- injury and part of body affected;
- description of any equipment affected or involved;
- names and comments of witnesses;
- direct cause;
- indirect, underlying, or contributing factors (including fault or failure in safety and health program elements); and
- corrective action implemented or preventive measures taken (including safety and health program adjustments).

Review & Revision of Components

The _____ (title) or other designated representative will review and revise the components of the Accident Prevention Plan _____ (frequency) for effectiveness and implementation. Special attention will be devoted to areas and criteria that demonstrate failure in a program component, introduction of new procedures, processes, or equipment.

Corrective measures will be taken as needed to reemphasize or restructure the Accident Prevention Plan to perform at the optimum effectiveness.

Information will be solicited from area supervisors and employees to determine the effectiveness of each program component, and assistance in developing adjustments and corrections.

Goals & Objectives

Goals

An effective Accident Prevention Plan will achieve the following goals:

- effective involvement of each and every employee of the company;
- eliminate any and all hazards (current and potential) that expose or create risk of any nature;
- reduce all work-related incidents resulting in injury or illness to any employee or other person associated with our operations or business;
- reduce all losses due to incidents resulting in injury or illness to any employee or other person or property damage from such incidents;
- increase awareness of the overall safe operation of all facilities;
- increase employee morale by knowing their work environment is maintained as free as possible from any and all recognized hazards;
- eliminate all work-related injuries and illnesses, property damage, and all associated losses.

Objectives

- implementation of an effective Accident Prevention Plan;
- commitment for ongoing support from each and every level of management and personnel;
- assigned responsibilities and accountabilities for the safety program;
- allocation of adequate resources to the safety program;
- establish lines of communication involving management and employees at all levels for safety and health concerns;
- effective records and documentation maintenance and review;
- completion of comprehensive surveys and periodic self-inspections;
- implementation of effective measures for hazard identification, correction and control;
- implementation of effective orientation and training programs; and
- initiation of regular program review and revision procedures.

The goals will be realized only if the objectives are carried out without hesitation or interruption, and if every employee becomes interested in the safety program and its success.

Employee Commitment & Responsibilities

We recognize the success of any company endeavor is largely dependent on the entire workforce. This company recognizes the value of employee involvement to assist us in realizing the goals we have set for ourselves.

The company president aggressively solicits from all employees the assistance for, and commitment to, the implementing of the Accident Prevention Plan.

Employees are encouraged and expected to become involved in all aspects of implementing the Accident Prevention Plan.

Employees are expected to utilize established avenues to solicit and receive comments, information, and assistance where safety and health is concerned.

Employees are expected to perform their job duties in a manner that is safe for themselves, as well as those around them.

Employees are required to abide by all safety and health policies, procedures, and rules established by this company. Employees of this company will adhere to the safety and health regulations established by federal, state, and local agencies.

Employees are expected and required to adhere to this company's safety and health program. This is not optional! Your continued employment with _____ (company) is contingent upon your recognizing and abiding by the safety and health policies, procedures, and rules established by this company.

Employee Involvement

Management encourages employee involvement in each part of the implementation process for the ongoing safety and health program of this facility. We solicit this involvement

by giving each employee an opportunity to participate and be responsible for implementation of the safety program for their respective areas.

Departmental Safety Meetings

This company will ensure that all employees meet on a regular basis to discuss safety and health issues or concerns and increase employee awareness of the safety and health program. Regular meetings will keep the program active in the minds of the employees, and offer an avenue for employees to voice concerns regarding workplace safety and health. Meeting minutes and attendance records will be kept on file. Minutes will include all safety items and procedures discussed as well as the date and time of the meeting.

Reporting of Hazards & Unsafe Conditions

As a condition and requirement of employment, all employees are required to report hazards and unsafe conditions in the workplace to _____ (title). He/she will take prompt and appropriate action to determine if a hazard exists. If it is determined that a hazard does exist, immediate attention for correction or interim protective measures will be taken. Whether a hazard is identified, the reporting employee will be notified of the corrective action taken or the procedures used to conclude that no hazard existed. If practical, this information will be shared with all facility employees.

Documentation

All hazard reports and corrective measures/action taken will be documented and recorded. This documentation will be reviewed by management. Pertinent information will be made available for employee review.

Disciplinary Policy

_____ (company) has developed a disciplinary policy that applies to the safety and health program of this company. The disciplinary policy will be a tool to ensure enforcement of the rules and procedures for a safe and healthful working environment. The disciplinary policy applies to all employees of this company.

Verbal Warnings

Management or supervisors may issue verbal warnings to employees that commit minor infractions or violations of the safety rules or safe work practices. Continued violations or verbal warnings will lead to more stringent action.

Written Warnings

Management or supervisors may issue written warnings for the following:

- repeated minor safety rule violations or procedures;
- single serious violations of a rule or procedure that could have potentially resulted in injury to themselves or another employee or could have caused property damage; or
- activities that could potentially result in injury or property damage.

Disciplinary Leave

Supervisors may recommend, and management may institute, disciplinary leave for the above reasons and the following:

- a single serious violation of a rule or procedure that results in injury to an employee or property damage; or
- repeated violations, nonconformance to safety rules or procedures.

Termination

Supervisors may recommend and management may concur in the termination of any employee for repeated serious violations of the above circumstances.

Documentation

Violations of company rules or safety rules, regulations or procedures will be documented by filling out a report on the employee. The report will state the type of violation and corrective action taken. The employee must read and sign the report acknowledging that they understand the seriousness of the violation.

Self-Inspection Forms

Inspection Date: _____

Location or Department Inspected: _____

Signature: _____

- | | YES | NO |
|--|--------------------------|--------------------------|
| 1. Housekeeping -Is the work area clean and orderly? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Floors - Are floors in good condition (smooth, clear surfaces without holes, cracks, or humps)? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Aisles - Are aisles and passageways clear, dry, and free of tripping hazards? | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Stairways -Are stairs in good condition, with handrails, and adequate lighting? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Storage - Are materials, products, or supplies properly and safely stacked to a workable height? | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Ladders - Are ladders provided where needed, of standard construction, and in good physical condition? | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Machines & Equipment - Are machines and equipment in safe operating condition?
Are the necessary guards provided and used? | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. Hand Tools - Are the right tools for the job being used?
Are they in good condition? | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Electrical - Are all required grounds provided on power tools and extension cords?
Is equipment in good operating condition? | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Lighting - Is adequate lighting provided in all work areas? | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. Eye Protection — Are all employees provided with suitable eye protection when around operations that produce flying particles? | <input type="checkbox"/> | <input type="checkbox"/> |
| 12. First Aid - Are first aid supplies provided if needed? | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. Fire Extinguishers — Are fire extinguishers easily accessible and properly serviced? | <input type="checkbox"/> | <input type="checkbox"/> |
| 14. Entrances — Are entrances kept dry or provided with nonskid mats? | <input type="checkbox"/> | <input type="checkbox"/> |
| 15. Exits — Are emergency exits marked, clear and easily accessible?
Are exit doors unlocked and do they swing toward the outside? | <input type="checkbox"/> | <input type="checkbox"/> |
| 16. Exterior (sidewalks, parking lots, etc.) — Are sidewalks and parking lots smooth and free of cracks, holes and tripping hazards? | <input type="checkbox"/> | <input type="checkbox"/> |
| 17. Training — Are all employees trained in proper lifting techniques and material handling? | <input type="checkbox"/> | <input type="checkbox"/> |
| 18. Signs — Are safety instructions and warning signs posted where needed? | <input type="checkbox"/> | <input type="checkbox"/> |

Safety Program Employee Acknowledgment

Employee Name _____

Date Hired _____

—
Social Security No. _____

Driver's License _____

The undersigned employee acknowledges that they have received, read and understood the contents of the safety program. If unable to read, the contents of the safety program have been explained by your supervisor. Complying with all stated company policies, including safety, is a condition of continued employment with this company.

Signature _____ Date _____

Safety Hazard Report

Location: _____

Date: _____

Day of Week: _____

Time: _____

Hazard Description:Recommendation:

Signature _____

Supervisor's Report of Employee Injury Investigation

Injured Employee _____ Date of this report _____
Job Title _____ Age _____
Date and time of injury _____ Where injury happened _____
Report to supervisor or first aid delayed? _____ Why? _____
Supervisor's comments regarding cause of injury _____
Was there lost time as a result of this injury? _____ Lost time began _____
What should be done, and by whom to prevent recurrence of this type injury in the future?

What action are you taking to see that this is done?

Was employee's previous injury record reviewed with him or her? _____

Total number of injuries to date? _____ Date employed _____
Does previous injury record indicate repeated types of injuries? _____

Supervisor's Signature _____

Training Attendance List

Date Held: _____

Program Title: _____

Trainer: _____

The following personnel attended the training listed above:

NAME	SSN	SIGNATURE
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Topics Discussed

Annual Review Accident Prevention Plan

Review Date: _____

New Exposure Identified: _____

Action Taken: _____

Reviewed By: _____

Specialized Training Schedule

Description	Responsible Person	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec