



Notice to the Project

It is the responsibility of the project team to provide each subcontractor with a copy of the Subcontractor Safe Start Documents.

Please make copies of this original package to distribute to each subcontractor prior to the start of their work on the project.

Below is a sample notice to send to each subcontractor via email/letter format. A Safe Start Documentation Submittal Checklist is also provided (*Section 1*) for your use to ensure that all subcontractors comply with submittal requirements.

NOTE: All Safe Start Submittals (*located in Section 1*) shall be submitted **PRIOR** to scheduling a Safe Start meeting to ensure timely review and proper completion.

Should you have any questions regarding this package, please contact CMHP Safety.

PRIOR to work operations, **ALL** Subcontractors shall attend a Safe Start meeting and **ALL** Safe Start Submittals shall be collected.



Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP)
"Safe Start" Submittals & Meeting

Please review and complete the attached forms. These forms shall be completed and submitted to CMHP **prior** to attending the "Safe Start" meeting:

The following forms are required to be completed and/or signed:

1. Competent Person List
2. Fitness for Duty Certification
3. Safety and Health training certification
4. Rigging Training & Third Party Crane Inspection Acknowledgement Form
5. Trucking Compliance Acknowledgement Form
6. Subcontractor List (if the subcontractor will have any second tier subs)

Also required:

7. A copy of your site specific MSDS sheets with an MSDS inventory list
8. HAZCOM Program (Hazardous Communication Program)
9. Safety and Health Manual
10. JHA (Job Hazard Analysis). The JHA must be **site specific**.

After all of the required paperwork is submitted and reviewed by our project team, a Safe Start meeting will be scheduled with our project Superintendent and Safety Manager. Each subcontractor is required to attend the Safe Start meeting **prior** to work. Your company's designated Safety Representative, General Foreman/Superintendent and your company's safety manager are required to attend the Safe Start meeting.

If you have any questions please let me know.

Thank you.

Clark/McCarthy Healthcare Partners,
A Joint Venture

SUBCONTRACTOR SAFE START DOCUMENTS

January 2010



— Clark/McCarthy Healthcare Partners, A Joint Venture —
in association with



Clark/McCarthy Healthcare Partners, A Joint Venture

SUBCONTRACTOR SAFE START MANUAL

Project Name: _____

Project Number: _____

Subcontractor: _____

Meeting Conducted by: _____ Date: _____

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Subject: Trucking Compliance

1. PURPOSE

To establish the minimum requirements for Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP) for the safe operation of all trucks, by providing all project employees, as well as the general public, with a safer environment by requiring operators of trucks that haul material/debris from Clark project sites to follow a set of standards that are based on Department of Transportation (DOT) and common sense safety standards.

2. SCOPE

This procedure applies in its entirety to all CMHP projects unless a variance is granted by the Corporate Director of Safety and Health.

3. DEFINITIONS

- (a) All-In-Compliance (AIC) stickers. Supplied by the CMHP Safety Department, these stickers are individually numbered and registered to each applicable CMHP project for placement on the windshield or passenger side window of any excavation and/or demolition trucks operated on the project, and are intended to signify compliance with the Safe Trucking Standard of all trucks and their operators.
- (b) Safe Trucking Standard. Set of standards for excavation and/or demolition trucks entering and exiting CMHP projects.

4. RESPONSIBILITIES

- (a) The Project Superintendent has overall responsibility for establishing and ensuring compliance with this procedure.
- (b) The Project Safety Manager is responsible for implementing all activities associated with this procedure.
- (c) It is the responsibility of all managers and supervisory personnel to enforce this procedure and of each employee to follow it.

5. GENERAL REQUIREMENTS

- (a) AIC stickers are to be displayed in the lower left corner of the Drivers side window or the lower left corner of the vehicle's windshield.
- (b) Subcontractors. All CMHP subcontractors will be held accountable for the compliance of their lower tiered subcontractors. Onsite subcontractor supervisors will be expected to monitor and ensure compliance and, from time to time, perform random checks for appropriate paper work and safety compliance. An acknowledgement letter (Attachment B) shall be completed and submitted to CMHP prior to starting work.

Subject: Trucking Compliance

6. IMPLEMENTATION

- (a) Each subcontractor awarded a demolition or excavation subcontract will be furnished, by the CMHP Purchasing and/or Safety Department, a copy of this program and/or a summary (Attachment A) explaining the requirements along with an acknowledgement letter (Attachment B). An appropriate number of All-In-Compliance (AIC) stickers will be sent to the project for distribution to subcontractors.
- (b) Project Safety Managers will, at each subcontractor “Safe Start” meeting, review the Safe Trucking Standard and distribute additional copies of the Standard and additional AIC stickers, if necessary, to the subcontractor performing applicable work on a CMHP project. Further, Project Safety Managers will remind each subcontractor that all subcontractors are accountable for the compliance of all of their lower tiered subcontractors.
- (c) Any truck subject to this policy that is found on a CMHP project without the AIC sticker will be ordered to leave the project and will not be allowed to return until in compliance with the Safe Trucking Standard.
- (d) The Project Safety Managers and Project Superintendents will check from time to time the trucks’ and their operator’s compliance with the Safe Trucking Standard. Some of the items the staff members will check include, but are not limited to:
 - 1. Truck operators know the correct and approved haul route to and from the project.
 - 2. Truck operators have in their possession a valid and current Commercial Driver License (CDL).
 - 3. Truck’s brakes keep the truck from moving forward or backward when the emergency brake is applied and the clutch is released while the transmission is in gear.
 - 4. Truck’s headlights, brake lights, turn signals, etc. function properly.
 - 5. Truck’s backup alarm functions and is sufficiently loud to be heard within the prescribed distance, as outlined in the Federal OSHA 1926 Standard.
 - 6. Required paperwork, as described in the Safe Trucking Standard, is in the possession of the truck operator, such as current insurance certification card, registration, a recent DOT safety inspection certificate, etc.
- (e) Subcontractors are responsible for their subcontractor’s compliance to this program.

Subject: Trucking Compliance

- (f) Failure to comply with any of the above items will subject the truck and/or operator to be banned from the CMHP project until the truck and/or operator is in compliance with the Safe Trucking Standard. Continued failure to comply will result in the subcontractor possibly being removed from CMHP's bid list.

7. EXHIBITS/ATTACHMENTS

- (a) Safe Trucking Standard Summary (Attachment 1).
- (b) Acknowledgement Letter (Attachment 2).

Attachment 1 – Safe Trucking Standard Summary

In addition to this Subcontractor's own safety program, this Subcontractor shall comply with the following:

1. Before any trucking company begins work on this Project, this Subcontractor must require that the trucking company provide to this Subcontractor the following:
 - i. Current documentation demonstrating that the trucking company has the level of liability insurance required by law in addition to Subcontractor insurance as required by this Subcontract;
 - ii. Current documentation demonstrating that the trucking company has all licenses and permits required by law to authorize it to perform all of the work the trucking company is reasonably likely to perform, in each jurisdiction in which the trucking company is reasonably likely to perform such work, during the course of the project;
 - iii. Current documentation demonstrating that a qualified inspector performed the last periodic inspection required by applicable federal law (or its legal equivalent) and any applicable state, city or county laws on each truck, including its brakes, and that each truck was found to be in proper working condition; and
 - iv. Current documentation demonstrating that the trucking company has, and follows, a policy of not paying or reimbursing its drivers for any speeding tickets, in any circumstances.
2. During the term of the Project, this Subcontractor must require the trucking company to submit new documentation of the types specified in paragraphs 1.A through 1.D above, if any such documentation expires, becomes superseded, or becomes inapplicable, or if new information becomes available, or if new information is requested by CMHP.
3. Prior to a trucking company beginning work on the Project, this Subcontractor must provide such trucking company with a certification indicating that this Subcontractor has found the trucking company has complied with Requirement No. 1, above, in its entirety. This Subcontractor must require the trucking company to display such certification on the windshield of each truck used on the Project. The certification shall list each driver authorized to operate the truck in connection with the project.
4. Prior to any truck driver beginning work on the Project, this Subcontractor must inspect the driver's commercial driver's license (CDL) to confirm it is current and it permits the driver to perform all driving the driver will do in connection with the Project. This Subcontractor shall retain copies of these licenses and provide copies to CMHP as requested.
5. This Subcontractor must identify and communicate to the drivers all routes of the trucks from the Project to the unloading destination. These routes must conform to all local ordinances and regulations of the applicable jurisdiction.

**Clark/McCarthy Healthcare Partners, A Joint Venture
Safety and Health Manual**

Subject: Trucking Compliance

6. To the extent this Subcontractor uses the length of time of hauling trips to assess the performance of a trucking company or its driver, this Subcontractor shall use, as its benchmark, the reasonable length of time required to make a hauling trip using the route(s) this Subcontractor has identified in accordance with requirement No. 5, above.
7. This Subcontractor must not load any truck with a weight that would cause the truck to exceed the maximum weight allowed for the truck in any jurisdiction through which or into which will be driven. Each Subcontractor is solely responsible to periodically verify weights of trucks entering or leaving each project.
8. In compliance with all items listed above, this Subcontractor will submit an Acknowledgement Letter to CMHP prior to start of work. This subcontractor shall identify each truck and operator found to be in compliance with this program by way of issuing a sticker to be placed on the approved trucks. This Subcontractor will allow only trucks with the sticker on the site.
9. This Subcontractor shall take all other steps necessary to ensure that trucks are operated safely and in accordance with all applicable laws.

Subject: **Trucking Compliance**

Attachment 2 – Acknowledgement Form

This will certify that all _____
(Subcontractor)

Trucks and their (lower tier subcontractor trucks): who will work on CMHP project (# and name): _____ have met the requirements set forth in CMHP's Trucking Compliance and Safe Trucking Standard as well as all U.S. Department of Transportation, Federal Motor Carrier Safety Administration, State and Local Trucking Regulations.

We further certify that all DOT regulated vehicles used or hired by our company on this project meets the requirements of CMHP's Trucking Compliance and request _____ All-in-Compliance Stickers (AIC) for these trucks.

Date

(Signed by Subcontractor Company Officer or Authorized Designee)



Clark/McCarthy Healthcare Partners, A Joint Venture
in association with



Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP)

PRE-CONSTRUCTION SUBCONTRACTOR SAFE START ORIENTATION

Review with Contractor Safety Representative before work starts

Contractor: _____

Project Name: _____ Project No. _____

Contractor Safety Representative: _____ Mobile No. _____

Contractor Superintendent: _____

Place a checkmark (✓) in each block after it has been explained.

1. **CMHP Safety and Health Program Overview (Section 2)**

- ☐ **Statement of Policy (Page 1)**
- ☐ **Purpose (Page 1)**
- ☐ **Project Safety Requirements for Subcontractors (Page 2)**
 - ☐ Introduction – *Responsibilities*
 - ☐ Subcontractor Safety Representative Responsibilities – *Read*
 - ☐ Job Hazard Analysis (JHA) of Safe Start Documents
- ☐ **New Hire Safety Orientation (Page 3)**
 - ☐ A Project Specific Orientation is required for each employee prior to starting work.
 - ☐ Upon completion of the orientation, each employee will be given a sticker to indicate the employee has received initial safety orientation and is authorized to be on site.
 - ☐ The sticker must be worn on the hardhat as a condition of employment.
- ☐ **Project Safety Meetings (Page 15)**
 - ☐ Subcontractors must attend all CMHP Project Safety Meetings.
 - ☐ Weekly Toolbox Talks – Submit documentation weekly to CMHP.
 1. Must include name of company, date, signatures of attendees, topics, and comments.
 2. A pre-shift Take Five meeting should be held by each contractor and documented on their daily reports.
- ☐ **General Safety Procedures (Page 16)**
 - ☐ All Subcontractors must ensure that their employees, subcontractors, and suppliers, regardless of tier, understand and agree to comply with their company's Safety and Health and HAZCOM Program, the Contract Documents, the CMHP Safety and Health Manual, OSHA Standards and all other federal, state and local codes, laws and regulations.
 - ☐ Subcontractors shall review all information, policies and procedures found here within, with all lower tier subs under their contract.
 - ☐ Prior to a vendor or supplier performing work under the subcontractor's direction, a detailed JHA shall be submitted to CMHP for review and approval.
 - ☐ Subcontractors shall require that each of their employees wear personal protective equipment required for the performance of their work and enforces its use as a condition of employment.

- ☐ **Applicable Safety and Health Requirements**
 - ☐ Personal protection equipment:
 - ☐ ANSI approved eye protection shall be worn onsite at all times.
 - ☐ Safety vests will be required during the excavation and foundation phase of the project.
 - ☐ Class two safety vests must be worn by all employees working on the roadway.
 - ☐ Scaffolding – Discuss competent person, inspection, proper erection/ dismantling, and fall protection.
 - ☐ Excavation – Discuss competent person, inspection, and proper sloping, etc.
 - ☐ Fire Prevention – Discuss fire extinguishers, use of pressurized gas cylinders, temporary heat, and hot work permits.
 - ☐ Powder-Actuated Tools – must have certificate for particular tool.
 - ☐ Electrical – GFCI's are required for all phases of the project. All temporary permits shall be marked per OSHA regulations. Lock out / tag out procedure renewal.
 - ☐ Confined Space / Respirator Use and Requirements / Air Monitoring.

- ☐ **Subcontractor Safety and Health Enforcement Policy (Page 17)**
 - ☐ Safety Violation examples: Violations of fall protection, eye protection, fighting, drugs and alcohol use, unsafe behavior, etc.
 - ☐ Project Safety Representative will be held accountable for the immediate correction of hazards and unsafe acts by their employees, subcontractors, and vendors.
 - ☐ CMHP reserves the right to stop work, correct hazard and back charge, send notice to company President/Insurance Company, terminate employee, replace Superintendent / Safety Representative, and/or withhold payments to correct the hazard.

- ☐ **Fitness For Duty Program (Section 4)**
 - ☐ Subcontractors must have Fitness For Duty (Drug Testing) Program that meets or exceeds the CMHP Program.
 - ☐ Pre employment, post incident and reasonable suspicion testing are required.

- ☐ **Job Hazard Analysis (Section 6)**
 - ☐ Submit copy to CMHP prior to work for approval.
 - ☐ Review phases/types of work; hazards to address.
 - ☐ Review sample and instructions for JHA Form.
 - ☐ Must include fall protection (if applicable) and clean-up activities.
 - ☐ CMHP can provide sample JHA Form.
 - ☐ Required for work performed onsite by vendors and suppliers (pump trucks, cranes, boom truck deliveries, scaffold erection and hoist installation).

- ☐ **Work at Elevated Locations (Fall Protection Program) (Section 7)**
 - ☐ Review of the 6 foot 100% fall protection policy.
 - ☐ Review of the Zero Tolerance Policy for fall protection violations.
 - ☐ Discuss Guardrail Systems, Safety Net Systems, Personal Fall Arrest Systems, Fall Protection Plans, Controlled Access Zones, Safety Monitoring Systems, Warning Line Systems, Holes and Falling Objects, Training, and Steel Erection.
 - ☐ Review of CMHP Fall Protection Equipment Release Form.

2. Subcontractor Safety Documentation Checklist and Forms (Section 3)

- ☐ Emergency/Safety Contacts List (List First Aid/CPR certified personnel, Competent Persons, and Emergency Contacts with phone numbers).
- ☐ Fitness for Duty Certification. (Section 4)
- ☐ Equipment Inspection Reports.
- ☐ Hazardous Material Inventory List with corresponding MSDS's (site specific). (Section 1)
- ☐ Safety and Hazard Communication Programs.
- ☐ Training Certification. (Section 1)
- ☐ JHA – Site Specific. (Sections 1 & 6)
- ☐ Demolition/ Steel Erection Plans, other.
- ☐ First tier subcontractors shall obtain the above listed documentation for each lower tier Subcontractor under their contract. This documentation must then be submitted to CMHP prior to their start of work.

3. Incident Reporting (Section 9)

- ☐ All Incidents/Injuries/Property Damage – notify CMHP immediately.
- ☐ Complete First Report of Injury and Incident Investigation Report - submit within 24 hours.
- ☐ Emergency Action Plan (Fire/Medical Procedures)
 - ☐ Post Emergency Phone Numbers and Clinic Directions at gang box/trailer.
- ☐ One person on-site with First Aid and CPR training.
- ☐ First Aid Kits and Fire Extinguishers must be located in gang boxes.

4. Emergency Action Plan (Section 8)

5. Contractor Controlled Insurance Program: ___ Yes ___ No

- ☐ Subcontractor required to be enrolled: ___ Yes ___ No
- ☐ Subcontractor enrolled and Enrollment Form 3 turned in: ___ Yes ___ No
- ☐ All claims must be reported to CMHP Safety and Site Superintendent
- ☐ All lower tier subcontractors are enrolled: ___ Yes ___ No
- ☐ Light Duty Program will be provided by subcontractor: ___ Yes ___ No
- ☐ Site Specific Orientation required by all employees and lower tier subcontractors.
- ☐ All injured employees will go to designated clinics.

As the Contractor Safety Representative for my company, I understand that I am required to abide by the rules and procedures noted above, as well as to communicate these rules and procedures to the employees of my company and any subcontractor brought onsite.

Contractor Safety Representative _____ **Date** _____

Orientation Conducted By _____ **Date** _____

Copy # 1 – Project File

Copy # 2 – Contractor Safety Representative

Subject: Safe Start Documents

SUBCONTRACTOR SAFE START SUBMITTAL CHECKLIST

PROJECT NAME AND No.:

DATE:

SUBCONTRACTOR NAME	SAFE START MEETING DATE	COMPETENT PERSONS CONTACT LIST	SUBCONTRACTOR LIST	FITNESS FOR DUTY CERTIFICATION	EQUIPMENT INSPECTION REPORTS	MSDS (SITE SPECIFIC)	HAZMAT INVENTORY LIST (SITE SPECIFIC)	HAZCOM PROGRAM (ON SITE*)	TRAINING CERTIFICATION	JOB HAZARD ANALYSIS	DEMO/STEEL ECT. PLANS	SAFETY PROGRAM (ON SITE*)	NOTES
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													

* ALL Subcontractors shall submit the above documents PRIOR to the start of work

Subject: Safe Start Documents

SAFETY/COMPETENT PERSON CONTACT LIST

Safety Contact

NAME	TITLE	COMPANY NAME	ADDRESS	CONTACT NUMBER

Competent Person

NAME	COMPETENT AREAS	COMPANY NAME	ADDRESS	CONTACT NUMBER

Begin with your company and list all lower tier subcontractors (update as needed)

[illegible]

Subject: Safe Start Documents

Fitness for Duty Certification

This will certify that all _____ (*subcontractor*) employees who will work on the

New Orleans Veterans Administration Southeast Louisiana Replacement Medical Center Project have had pre-employment drug

screens and that the results of the drug screens for each employee assigned to this project were negative.

We use _____ (*name of drug testing laboratory*) to conduct drug and alcohol testing.

We further certify that our company Fitness for Duty program meets the requirements of the Clark/McCarthy Healthcare Partners, A Joint Venture

(CMHP) Fitness for Duty program.

(Signed by subcontractor **company officer**)

Subject: Safe Start Documents

PROJECT NAME: _____ **PROJECT No.** _____

[illegible]

Subject: Safe Start Documents

Safety & Health Training Certification

This will certify that all _____ (*subcontractor*) employees who will work on the

New Orleans Veterans Administration Southeast Louisiana Replacement Medical Center Project have been trained and educated in

the following areas of Construction Safety and Health.

- a. Fall Protection
- b. Scaffolding (if applicable)
- c. Rigging (if applicable)
- d. Fire Extinguishers
- e. Ladders
- f. Hazard Communications
- g. General Construction Safety
- h. Code of Safe Practices

(Signed by subcontractor **company officer**)

Subject: Safe Start Documents

Rigging Training & Third Party Crane Inspection Acknowledgement Form

This will certify that _____ (*Subcontractor*) employees who will be identified as

Riggers on the _____ (Project) have been trained on Rigger Qualifications

and Training as required by CMHP's Safety and Health Manual, Section: B2 - Crane Operations.

This will also certify that all mobile cranes will receive an inspection from a CMHP designated Third Party Crane Inspection Company

PRIOR to operating on site.

***All Riggers will be identified by wearing orange gloves or a specified color hard hat.**

(Signed by subcontractor company officer)

Subject: Safe Start Documents

Trucking Compliance Acknowledgement Form

This will certify that all _____ (Subcontractor) Trucks and their (lower tier subcontractor trucks) who

will work on (CMHP project # and name): _____ have met the requirements set forth in CMHP's Trucking

Compliance and Safe Trucking Standard as well as all U.S. Department of Transportation, Federal Motor Carrier Safety Administration, State and

Local Trucking Regulations.

We further certify that all DOT regulated vehicles used or hired by our company on this project meets the requirements of CMHP's Trucking

Compliance and request _____ (Total Number of trucks) All-in-Compliance Stickers (AIC) for these trucks.

(Signed by Subcontractor Company Officer or Authorized Designee)

Subject: Safe Start Documents

Page ____ of ____

Date _____

Project Name _____

Phase _____

Contractor_____

Location _____

[illegible]

1. STATEMENT OF POLICY

One of Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP) primary responsibilities, as the General Contractor, Construction Manager, or during self performing activities, is to administer a comprehensive Safety and Health Program for each project.

The safety and health standards herein set forth only establish standards in certain key areas, are not exclusive or exhaustive of subcontractors' project safety and health requirements and obligations, and do not exempt subcontractors from their responsibility to maintain an overall comprehensive Safety and Health and Hazard Communication (HAZCOM) Program for a project.

The OSHA Standards and the CMHP Policies and Procedures manual shall be referenced at all times for further requirements. This Basic Safety and Health Program Overview in conjunction with CMHP's Safety and Health Program Manual are required as a condition of contract with all subcontractors. Subcontractor's must follow all policies and procedures but are still solely responsible for their operations and employee's safety and health.

2. PURPOSE

1. Prevent incidental injury, occupational illness, property damage, and establish safe and healthful methods of construction for a project.
2. Outline the basic safety and health duties and responsibilities of all parties on a project.
3. Establish and implement a plan for safety and health education, training and monitoring to promote identification and elimination of hazards and unsafe acts.
4. Give an outline of the basic requirements found in the CMHP Safety and Health Program Manual.

3. DEFINITIONS

1. Superintendent - A CMHP Superintendent.
2. Project Safety Manager - A CMHP employee appointed by the Project Executive or National Director of Safety and Health to implement the Program.
3. Safety Carpenter - A CMHP employee appointed by the Superintendent on an as needed basis or as required by Contract Documents.
4. Foreman - A CMHP employee directly responsible for work and control of craft persons in their area of responsibility.
5. Project Employees - All CMHP employees involved in the construction of a project.
6. Subcontractor – A company hired by CMHP to perform project duties and functions

4. RESPONSIBILITY

For purposes of this overview:

1. All subcontracting personnel are required to follow all of CMHP's safety and health policies, in addition to their own company program.
2. All Subcontractor Foremen will:
 - a. Utilize the method of Pre-Phase Safety Planning--Job Hazard Analysis to include Safety Task Assignments, as necessary for all members of their crew. Demonstrate and explain to workers the safety and health precautions and actions that must be taken before proceeding with tasks.
 - b. Have on hand prior to start of work all tools, materials, equipment and personal protection equipment needed to perform the job safely.
 - c. Ensure that employees have been trained in the proper use, care and inspection of all safety equipment.
 - d. Screen employees under their supervision for craft knowledge, current job knowledge, safety and health knowledge and physical limitations to better assign the right person to the tasks at hand.
 - e. Check employees at the start of each shift to be sure they are ready to perform their assigned tasks. Be on the lookout for unusual symptoms of a physical, mental or emotional nature that could interfere with employee performance.
 - f. Follow-up with employees to be sure they are inspecting their tools and equipment and following the established safety requirements and safe work practices. Correct any noncompliance.
 - g. Coordinate planning and work activities with others performing work within or adjacent to the assigned work areas and cooperate with all on-site safety personnel.
 - h. Hold weekly Toolbox Talks with crew using and completing the Toolbox Talk forms provided. Return the completed form to the CMHP Superintendent or Project Safety Manager.
 - i. Ensure that prompt first aid is provided for each injured employee and promptly report all incidents to the Superintendent or Project Safety Manager.
 - j. Cooperate with the Project Safety Manager in completing the Incident Investigation report.
3. All Project Employees will:
 - a. Comply with the CMHP Safety and Health and HAZCOM Programs, the Contract Documents, OSHA Standards and all other federal state and local codes, laws and regulations.
 - b. Perform their work using safe and healthful methods for prevention of incidents to themselves, fellow workers, the general public and property of all concerned.
 - c. At all times wear attire suitable for construction work including shirts with sleeves, long trousers, and heavy leather work boots. Shorts or tennis shoes are never permitted.
 - d. Use and wear all personal protective equipment required. Hearing protection is required as determined by the Superintendent/Foreman. The wearing of hard hats is

Subject: Safety and Health Program Overview

- required for the full length of a project.
- e. Wear safety glasses with side shields or protective goggles at all times
- f. Understand that the use of a body belt, other than for positioning, is prohibited. A full body harness is to be used with fall arrest/protection systems.
- g. Attend weekly Toolbox Talks and sign the attendance list.
- h. Not ride on material hoists, with the exception of those workers specifically trained in their inspection and maintenance.
- i. Wear their seat belt when operating equipment in which a seat belt is required.
- j. Alert their Supervisor/Foremen of hazards, unsafe acts and near misses.
- k. Notify their Supervisor/Foremen immediately of any incident or incident.
- l. Wear specific safety equipment when required.
- m. Know that the unlawful possessing, manufacturing, dispensing, distributing, selling or using of a controlled substance; i.e., drugs and/or alcoholic beverages, on a project is strictly prohibited and violators are subject to immediate dismissal.
- n. Refrain from fighting, gambling, immoral and/or indecent conduct on Company property at all times including while in a Company vehicle.
- o. Not possess any weapons or firearms on Company premises, projects or in Company vehicles.

5. GENERAL REQUIREMENTS OF THE SAFETY AND HEALTH PROGRAM

1. New Hire Safety Orientation

Each CMHP employee and subcontractor on a project is required to attend a Safety Orientation prior to starting work. The presentation is conducted by the Project Safety Manager or a designee from CMHP Project management. The project will maintain written documentation of these safety orientations. The presentation is to include but not limited to items such as:

- a. Emergency procedures.
- b. Project work rules.
- c. Incident investigation.
- d. First Aid/Incident reporting.
- e. Fitness for duty.
- f. Lost time injury management policy.
- g. Fall protection policy (6 foot)
- h. Discipline policy.
- i. Actions to be expected for failure to comply with safety requirements.
- j. Parking and site security procedures and regulations.
- k. Public protection.
- l. Scaffold program and standards.
- m. Hazard communication.
- n. Hazardous Chemical Inventory List.
- o. All MSDS's on site and submitted before product is used.
- p. Safety incentive program.
- q. Ladder safety.
- r. Specific licensing requirements.
- s. Subcontractor's safety audits.

Clark/McCarthy Healthcare Partners, A Joint Venture Safety and Health Manual

Subject: Safety and Health Program Overview

- t. Our written safety program.
- u. Contractual obligation to comply with our safety program.
- v. Respiratory protection program or requirements.
- w. Fire protection.
- x. Confined spaces/Permits.
- y. Job hazard analysis.
- z. Safety meetings and documentation
- aa. Hazard abatement.
- bb. Housekeeping.
- cc. Project specific safety plan.
- dd. Designated safety representative.
- ee. Chain of command within the company.
- ff. Notification of OSHA visits.
- gg. Personal protective equipment policy (safety glasses mandatory).
- hh. Personal protective equipment use (including demonstration as necessary)
- ii. Owner imposed safety requirements.
- jj. First aid provider identification.
- kk. First aid kit location and contents with physician approval.
- ll. Footwear/Clothing/Jewelry/Hair policy.
- mm. Trenches and excavations.
- nn. Competent person identification.
- oo. Barricade/Barricade Tape (Yellow tape is cautionary; Red tape is mandatory).
- pp. Review of the safety and health booklet (this contains many of the above items)

The Foreman continues the safety training of new hires to include as a minimum:

- a. Orientation on potential job hazards.
- b. Use of special equipment.
- c. Use of hazardous chemicals.
- d. Daily responsibilities for Safety Task Assignments.
- e. Special fall protection.

2. Safety Meetings

a. Monthly Project Safety

- (1) The CMHP Superintendent will schedule, distribute notification of and chair the monthly Project Safety Meetings.
- (2) The following persons are required to attend:
 - (a) From CMHP: Superintendent, Project Manager, Project Safety Manager, Assistant Superintendents and other personnel as appropriate.
 - (b) Project Safety Carpenter.
 - (c) All Subcontractor Superintendents, Project Managers, and Safety Representatives.
- (3) The Project Safety Meeting Agenda will include any deficiencies noted in the

Subject: Safety and Health Program Overview

Project Safety Manager's weekly safety and health inspections for the month.

- (4) The Project Safety Meeting Minutes will be distributed to all attendees, the Project Manager of each subcontractor not in attendance and all CMHP employees.

b. Weekly Safety Meeting

- (1) The CMHP Superintendent and Project Safety Manager will hold a Weekly Safety Meeting in conjunction with CMHP Subcontractor Coordination Meeting.
- (2) The Safety Manager's survey will be discussed and all incidents or near misses reviewed.
- (3) The minutes of the meeting will be distributed to all on-site contractors.

c. Weekly Toolbox Talks

- (1) CMHP and Subcontractor Foremen will hold weekly Toolbox Talks.
- (2) The completed weekly Toolbox Talks topics will be given to the CMHP Superintendent or Project Safety Manager every Friday by 3 p.m.
- (3) The weekly Toolbox Talks Topics will include, as a minimum, the following:
 - (a) Discussion of the Toolbox Talks topics and safety and health bulletins/ red alerts distributed by CMHP.
 - (b) Instruction of employees in the safe, efficient planning and performance of work.
 - (c) Review of project incidents, near misses, hazards and unsafe acts including any deficiencies that are noted in the Project Safety Manager's weekly report.
 - (d) Review of monthly Project Safety Meeting Minutes as they affect work.
 - (e) Requests for suggestions and comments relating to safety and health.
 - (f) Announce Safety Recognition Award winners (if applicable).
- (4) The written documentation of weekly Toolbox Talks will contain the following:
 - (a) Name of company, project name and date.
 - (b) Special topics discussed for the project.
 - (c) Safety and health comments and suggestions from employees.
 - (d) Name of all employees in attendance.
 - (e) Signature of CMHP Foreman or Safety Representative, or Subcontractor Foreman that conducted the meeting.

3. Incident Reporting and Emergency Procedures

The following procedures apply to all employee or subcontractor injury/public

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injury/property damage incidents.

- a. The CMHP Superintendent or CMHP Safety Manager will be notified immediately.
- b. The CMHP Superintendent or designee will immediately notify the Project Executive, Corporate Director of Safety, Regional Safety Director and the Risk Management Department regarding incidents/incidents resulting in serious or fatal injury or extensive property damage. The Field Office Manager or designated person will notify the proper rescue and emergency units immediately.
- c. Subcontractors will be individually responsible for notifying OSHA within eight (8) hours in the event of a fatality or a single incident in which five (5) or more employees are hospitalized.
- d. Any time the CMHP Superintendent is absent from the project, the Superintendent must designate a responsible individual as an official representative with full authority to supervise and perform the duties listed below.
- e. After ensuring that standard first aid procedures are being administered, the Superintendent will:
 - (1) Check the scene.
 - (2) Call the proper rescue and emergency units.
 - (3) Care for the injured individual(s).
 - (4) Secure the work area. Remove non-essential people. Not disturb scene. Take photos of incident area.
 - (5) Secure names of witnesses and facts relating to the incident. Have witnesses remain until statements can be taken and investigation completed.
 - (6) Allow only authorized personnel into the area and onto the project site.
 - (7) Station an individual at the site entrance to escort emergency vehicles.
 - (8) Make sure the phone is manned and deter all non-essential calls.
 - (9) If incident involves a CMHP employee, ensure that a fellow employee or Foreman accompanies the injured person to the hospital. The accompanying employee must keep the field office informed of all developments and stay at the treating facility until relieved or directed to leave by a CMHP official.
- f. Major accident/incident notification procedures will continue per the Incident Procedures found in the policies and procedures part of the company manual.
- g. Dealing with the Media.
 - (1) The Company will select an official Company Spokesperson(s). This Spokesperson(s) is the only CMHP employee authorized to give any type of statement or interview regarding the incident/incident.
 - (2) If any CMHP employee is put in a position they cannot remove themselves from without giving a response, the appropriate response is:

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“The incident/incident is under investigation, and as soon as we have reliable information, we will make it available. Meanwhile, we are doing everything we can to assist in the rescue and investigation of personnel.”

- (3) When a statement or press release is warranted, the National Director of Safety will follow instructions from the Corporate Communications Group. Input from the R.E.O., Project Executive and Superintendent with concurrence of the C.E.O. or President will be reviewed prior to release.
- (4) The National and Regional Director of Safety will assist the Superintendent with the incident/incident investigation as well as any inspection made by OSHA and all other federal, state and local agencies.
- h. A complete Incident Investigation Report and a copy of the Employee First Report of Injury (Worker's Compensation Incident Report) from the project will be prepared and distributed within twenty-four (24) hours to the Superintendent/Project Safety Manager and Risk Management Department. The Superintendent will designate a responsible person to call the Risk Management Department and keep them advised of the situation.
- i. One copy of all Liability Incident Reports or Property Damage Incident Reports will be prepared by the Superintendent/Project Safety Manager and forwarded to the Risk Management Department along with a complete Incident Investigation Report.
- j. If required by contract, a copy of the Monthly Injury/Illness Report for the Contractor and each subcontractor of every tier will be forwarded to the Owner's Representative as soon as possible, but in no event later than seven (7) days after the end of each month.

5. Safety and Health Enforcement

All Project Employees will be subject to fair, constructive disciplinary action for policy noncompliance. The severity of a violation will determine the level of disciplinary action administered. The typical disciplinary action pattern is as follows:

- a. Verbal Reprimand: The employee will receive a verbal notice of the policy violation committed, which, if repeated, could result in further disciplinary action.
- b. Written Reprimand: The employee will receive a formal written notice of the policy violation committed and be informed that future violations may result in suspension or discharge from work.
- c. Suspension: The employee will be suspended from working on the site for a specified period. The employee will receive a formal written notice of the policy violation committed and be informed that future violations will, in all likelihood, result in discharge or disbarment from the site.
- d. Discharge: The employee will be terminated or disbarred as a result of a major policy violation or a pattern of safety violations. The employee will receive a formal written notice of the policy violation(s) committed.

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Note: Every incident will be evaluated on an incident by incident basis and CMHP reserves the right to remove anybody for any safety infraction at any time on any project.

6. Visitors

Persons not directly involved with the on-site construction of a project will not be allowed to enter the site unless they obtain permission from the Superintendent or the Superintendent's designee, sign a Visitor's Release Form and obtain and wear a hard hat, safety glasses with side shields and any other personal protective equipment required. Visitors must be escorted by a CMHP representative.

7. Traffic Control

- a. Traffic control and warning will be given in accordance with the standard regulations contained in the Manual on Uniform Traffic Control unless otherwise specified or shown on the drawings.
- b. Competent flaggers will be furnished by trades as necessary to control traffic for delivery of materials and equipment.
- c. Inspection of traffic control devices will be done on a daily basis throughout the period of any work affecting traffic flow.
- d. Employees directing traffic, making deliveries or working in unprotected areas adjoining traffic will wear traffic vests.

8. Hazard Communication Program

- a. The CMHP Hazard Communication Program is herein incorporated by reference to this Project Safety and Health Program.
- b. The OSHA Hazard Communication Standard - 1926.59, CMHP's Hazard Communication Program, Project Hazardous Chemical Inventory Lists and all Project Material Safety Data Sheets (MSDS's) will be located in the CMHP's field office. Copies of CMHP's Hazard Communication Program, Hazardous Chemical Inventory List and MSDS's will be made available upon request.
- c. No hazardous chemicals will be used until the MSDS is acquired on-site. Updated MSDS's will be submitted, upon receipt, to the Field Office Manager

9. Fire Prevention

- a. All project employees have a vested interest in fire prevention. The following fire guidelines set forth specific standards to prevent losses as a result of fires or gases associated with combustion.
- b. Fire Emergency Procedure

A Fire Emergency Procedure will be written by CMHP and distributed to all subcontractors. This Procedure will include a description of the selected alarm code, reporting and immediate action instructions. This Procedure will be periodically

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updated, discussed and distributed at Project Safety Meetings and will be conspicuously posted at phones and employee entrances as well as in all change rooms, trailers and offices.

c. Shanties and Trailers will:

- (1) Be of either noncombustible construction or of combustible construction having a fire resistance of not less than one hour when located within another building or structure.
- (2) Be heated with heating devices that meet established code and safety requirements. They will be placed, operated and maintained by a qualified person.
- (3) Be equipped with at least one ABC 20-pound fire extinguisher in good working order provided by the occupant.
- (4) Have an adjacent 55-gallon debris container provided by the occupant.
- (5) Not be used to store oily rags, oily cloths or fuels.
- (6) Be cleaned daily by their occupants to prevent the accumulation of combustibles.

d. Waterlines and Standpipes

- (1) A waterline will be extended as soon as possible behind construction to supplement the project's fire extinguishers.
- (2) Standpipes, when required, will be installed as soon as possible and maintained as construction progresses so they are always ready for fire protection use. Standpipes, during renovation, will be kept activated unless Fire Department permission is granted to deactivate them. Siamese hose connections will be kept free from obstruction and conspicuously marked.

e. Fire Extinguishers

- (1) CMHP will place the required number of fire extinguishers throughout the project. Employees will be trained in their proper use.
- (2) Additional fire extinguishers will be required around fire susceptible situations; i.e., welding and burning, use of temporary heaters, use of tar kettles and storing paints and flammable liquids.
- (3) Each shanty/trailer will have at least one ABC 20-pound fire extinguisher.
- (4) Fire extinguishers, immediately after use, will be replaced with fully charged units. Fire extinguishers will be checked weekly for condition. Each extinguisher will have an inspection tag.
- (5) Fire extinguishers will not be moved or discharged except for fighting a fire. Anyone discharging an extinguisher as a prank, or attempting to remove one from the site, will be subject to immediate dismissal.

f. Use of Pressurized Gas Cylinders

- (1) Cylinders will be provided with safety caps. Delivery of uncapped cylinders must

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- not be accepted.
 - (2) Cylinders must be stored and used in a secured vertical position. Storage areas will be well marked and located as designated by CMHP.
 - (3) Acetylene and fuel gas cylinders will be separated from oxygen cylinders during storage by a minimum of 20 feet or by a noncombustible barrier at least five feet high with a fire resistance of at least 30 minutes.
 - (4) Oxygen and acetylene cylinders in use must be firmly secured on a special carrier intended for this purpose with an attached fire extinguisher.
- g. Temporary Heat
- (1) Heating equipment must be acceptable to CMHP and be wired, piped and operated in accordance with all applicable codes and regulations.
 - (2) Unattended heaters of any type must not be operated during or after work hours.
- h. Basic Principles of Fire Prevention
- (1) Open fires will not be permitted on this Project. Employees failing to comply with this regulation will be subject to immediate dismissal.
 - (2) Tarpaulins and canvas will be made of fire retardant treated materials.
 - (3) Temporary electric or power will be installed and maintained in accordance with all existing codes and regulations.
 - (4) Storage of materials within ten feet of fire hydrants is strictly prohibited.
 - (5) Work areas will be policed on a regular basis to prevent accumulation of materials. Highly combustible packaging materials, such as cardboard boxes and excelsior, must not be allowed to accumulate.
 - (6) Machinery and/or motors will not be left running during nonworking hours except as directed or approved by CMHP.
 - (7) Fuel and solvent containers must be placed on drip pans and stored strictly in accordance with all federal, state and local codes, laws and regulations.
 - (8) Solid fuel salamanders are prohibited in buildings and on scaffolds. Check with all local agencies having jurisdiction regarding types of temporary heat permitted.
- i. Hot Work Permit
- (1) A Hot Work Permit is defined as a process or procedure that could result in a fire if not properly controlled. Common types of hot work include welding, torch cutting and burning.
 - (2) When welding or burning, a fire watch with an ABC 20-pound fire extinguisher will be provided. The potential fire area will be checked periodically for a minimum of 30 minutes after the welding or burning operation has been completed. Prior to performing any hot work, a Hot Work Permit will be obtained from the Owner's Representative or CMHP's Project Safety Manager.
 - (3) All brazing and soldering operations must have a properly charged extinguisher nearby.
- j. Fire Protection Check List

The Fire Protection Checklist is a tool for use when inspecting fire protection systems

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on a monthly basis. This form documents and provides information regarding when systems are activated or shut down and informs all trades and Project Management of the monthly status of the project's fire protection systems and current procedures.

10. General Safety Procedures

- a. CMHP will provide employees with all safety and personal protective equipment and weather protective gear required for the performance of work and will enforce its use as a condition of employment. Subcontractors will follow the same for their employees.
- b. CMHP will have at least one employee qualified in First Aid on the project.
- c. For emergency purposes, CMHP will post the names and telephone numbers of key personnel.
- d. All scaffolds will be checked daily before each use for safety compliance by the erecting subcontractor. No scaffold will be left at anytime in an unsafe condition and will be removed immediately or tagged out if not to be used again.
- e. Project shanties shall be equipped with a First Aid Kit. If gang boxes are used instead of the shanty, the gang boxes should contain the First Aid Kits. Fire extinguishers are required in all shanties and gang boxes.
- f. High velocity powder-actuated tools (those powder-actuated tools that do not contain a piston) will not be permitted on this project. CMHP or subcontractor employees will not be permitted to use powder-actuated tools without possession of a qualified operator's card for the particular tool being used.
- g. Stereos, tape decks, walkmans and other radios (except two-way radios) will not be permitted on any project.
- h. Extension cords, cables, and hoses will be inspected for damage before each use and repaired immediately or tagged and removed from use until repaired.
- i. A Ground Fault Circuit Interrupter System (GFI) are required on all CMHP projects where temporary power is in use. When change over to permanent power is made, portable GFI's will be used.
- j. Material must not be stored within six (6) feet of a floor opening or ten feet of the perimeter of the building. For assistance with storage locations, contact the CMHP Superintendent.
- k. To prevent wind blown objects, all equipment, materials and debris should be secured at all times or removed immediately to grade level until the building is enclosed.
- l. When any crew must remove cables, barricades, or any other safety related item in order to perform their work, it will be the responsibility of that crew to replace them each time they leave the area and when their work is completed.
- m. All Foremen will be responsible for maintaining general housekeeping in their work area, and all debris must be placed in debris containers or as otherwise directed. Daily clean up is recommended.
- n. No hazardous materials, which include but are not limited to oils, paint, solvent, coolant and petroleum products, will be placed in dumpsters or other trash containers.
- o. All equipment operators must be trained, licensed and/or certified to operate their specific equipment as required by federal, state and local laws; i.e., cranes and powder-actuated tools.
- p. All cranes of any type brought on a project must have a current annual inspection. A

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copy of the annual inspection must be on the project and reviewed by the Superintendent before the equipment can be put in service. Equipment must be inspected before each use.

- q. Oily or other hazardous substances must be prevented from entering or leaching into the building surfaces, ground, groundwater, drainage areas or local bodies of water. Temporary fuel oil or petroleum storage tanks must be surrounded with a temporary plastic-lined earth berm of sufficient size and strength to contain the contents of the tanks in the event of leakage or spillage, or be a double lined tank.
- r. A zero tolerance for fall protection violation will be enforced on the project. Any individual shall have adequate "positive" protection when exceeding any height of six foot per CMHP policy.
- s. All subcontracting companies working on any CMHP project shall provide light duty for individuals who may become injured but are permitted by medical staff to perform modified work.

11. Confined Space Entry

- a. When work in confined spaces is scheduled, such as in pits, manholes, caissons, boilers or deep excavation, consideration must be given to two major known and recognized hazards:
 - (1) The possibility of fire or explosion, flammable gases, fumes, vehicle fumes, vapors or dust.
 - (2) The possibility of injury or loss of consciousness as a result of inhalation or absorption through the skin of toxic materials or from oxygen deficiency
- b. Work required in a confined space must meet all applicable OSHA Standards and follow the procedures referenced in the CMHP Confined Space Program

12. Trenching/Excavation

All trench or excavation safety systems and procedures must meet OSHA standards with the use of sloping, benching or shoring. Where these systems cannot be used to meet OSHA standards or the trench or excavation is 20 feet or greater in depth, a Professional Engineer will design the trench or excavation safety system. Prior to entry, a competent person as required by OSHA must inspect all trenches or excavations for safety.

13. Elevator Safety

- a. Project planning should include the early turnover of a permanent elevator. The elevator must meet all of the elevator safety code requirements and be inspected by the appropriate authority before being accepted and operated by CMHP.
- b. No CMHP employee will have or use a hoistway door-unlocking device, except for the Superintendent and the Elevator Subcontractor. The hoistway door unlocking devices will be used only during or for elevator installation, service, repairs, inspections and emergencies. The Superintendent must maintain a written control log for key use.
- c. No CMHP employee will use a hoistway door unlocking device or any other means to access the elevator hoistway when the car is not in the landing zone, unless

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authorized to do so by the Superintendent. The following safety procedures must be in place when the location of the car is not known:

- (1) The area in front of the hoistway door to be opened must be barricaded.
 - (2) The Superintendent opening the hoistway door must be using fall protection.
 - (3) The car in the hoistway must be locked out of service.
- d. Elevators put into temporary use during construction must be operated only by a trained CMHP operator with a radio. The car will be parked at the end of the shift at an appropriate, pre-determined level with the doors open, lights on and the power shut off. A means to secure the elevator in this location until the next shift and prevent unauthorized use will be implemented by the Superintendent in coordination with the Elevator Subcontractor. The temporary use of the elevator will include a Floor Call System.
- e. Materials will not be moved using the top of the car.

14. Severe Weather Conditions

Upon notice of pending severe weather conditions, the Superintendent will:

- a. Secure all loose material and equipment upon notice of pending storm.
- b. See that all outdoor work is suspended and all loose material and equipment are secured until the threat of severe weather or high winds passes.
- c. Immediately after the condition passes, inspect the site and notify the Risk Management Department and Safety Department of any damages to material, equipment, building, or injury to any employees.

15. Hazardous Materials

Hazardous materials (i.e., PCB's, gasoline, oil, lead and asbestos) are not expected to be encountered throughout the duration of the project. If in fact potentially hazardous materials are encountered they will be dealt with accordingly:

- a. Immediately barricade them and prohibit access to the area.
- b. Notify the National Director of Safety, Superintendent, Project Safety Manager and Legal/Contracts Department immediately.
- c. Upon notification and availability, the above-mentioned personnel will assess the situation, identify the material and determine appropriate actions.
- d. Contact the proper authorities as well as the appropriate hazardous material contractor(s) for removal purposes, unless the material is going to be addressed by the Owner.
- e. When removal is completed, as determined by CMHP or the remediation contractor, normal work operations may be resumed.
- f. The hazardous material remediation contractor will submit copies of all applicable permits from federal, state, and/or municipal authorities and copies of necessary disposal certificates.

16. Safety Testing Equipment

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All necessary safety testing equipment will be made available to the Safety Manager on an as needed basis. This equipment will be obtained in advance of any work so that all required testing may be performed without impacting the schedule or safety requirements.

F. ADDITIONAL PROJECT SAFETY REQUIREMENTS FOR SUBCONTRACTORS

1. Introduction

Subcontractors will, as a minimum, incorporate all of the principles of the CMHP Safety and Health Program, Policies and Procedures into their safety programs. Subcontractors must accept responsibility for the management and implementation of their company's Safety and Health and HAZCOM Programs for the project and will ensure that their employees, subcontractors and suppliers, regardless of tier, know, understand, properly implement and are held accountable for complete project safety and health requirements.

Subcontractors have a legal as well as a contractual obligation to perform their work using safe and healthful methods and to comply with their company's Safety and Health and HAZCOM Programs for the project, the Contract Documents, the Occupational Safety and Health Administration (OSHA) Standards and all other applicable federal, state and local codes, laws and regulations.

All subcontractors will appoint a responsible and qualified competent management employee (as defined by OSHA) as their Project Safety Representative.

2. Subcontractor Safety Representatives will:

- a. Ensure that their employees, subcontractors and suppliers, regardless of tier, comply with their company's Safety and Health and HAZCOM Programs, the Contract Documents, OSHA Standards and all other federal, state and local codes, laws and regulations. They must also ensure that all work activities are preplanned with an emphasis on safety and health to prevent bodily injury, illness and property damage.
- b. Post a copy of the Medical Emergency Procedure and the Fire Emergency Procedure for the project in their change rooms, trailers and offices.
- c. Make provision for immediate first aid and/or medical/hospital treatment for all work related injuries and illnesses of their employees.
- d. Ensure that a Pre-Phase Job Hazard Analysis and Safety Task Assignment are developed and implemented for each major work operation.
- e. Be responsible for the Subcontractor Incident Reporting Requirements.
- f. Attend all monthly Project Safety Meetings.
- g. Arrange for weekly Toolbox Talks. A copy of the written minutes must be forwarded to the Project Safety Manager.
- h. Report all safety and health related matters to the Superintendent and/or the Project Safety Manager.
- i. Perform daily safety inspections of work areas and equipment.
- j. Ensure that an Employee Information and Training Checklist is completed and documented for new employees prior to starting work on the project.

3. Job Hazard Analysis and Safety Task Assignments

Each subcontractor, regardless of tier, must submit to CMHP a Pre-Phase Safety Plan

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including a Job Hazard Analysis (JHA) for each phase of work. This JHA will be reviewed by the CMHP Superintendent and Project Safety Manager at a Pre-Phase or Pre-Construction Meeting.

4. Pre-Construction Subcontractor Safe Start Orientation

At least seven days before each subcontractor starts work, the Subcontractor's Project Site Management will attend a Subcontractor "Safe Start" Orientation Program at the site office. The Program will include the following:

- a. Applicable Federal, State and Local Safety and Health Regulations.
- b. Familiarization with the CMHP Safety and Health Program requirements.
- c. Incident and safety reporting and record keeping procedures for the project.
- d. Subcontractor Safety Representative responsibilities.
- e. Project Emergency Procedures.
- f. Site Security Requirements.
- g. Submittal of a Job Hazard Analysis for the subcontractor's phase of work for safety planning, employee orientation and safety task assignment.

5. New Hire Safety Orientation

Each subcontractor employee on the project will attend the project Safety Orientation prior to starting work. CMHP Project Management will conduct the presentation.

6. Project Safety Meetings

- a. All Subcontractor Safety Representatives must attend the CMHP Monthly Project Safety Meeting.
- b. Weekly Safety Meeting:
 - (1) Weekly Safety Meeting will be held by the Superintendent and on-site Safety Manager at the start of each CMHP coordination meeting.
 - (2) The CMHP Safety Managers Survey will be discussed and all incidents or near misses reviewed.
 - (3) The minutes of the meeting will be distributed to all on-site contractors.
- c. Weekly Toolbox Talks
 - (1) The Subcontractor Safety Representative or Foreman will hold weekly Toolbox Talks.
 - (2) A copy of the completed weekly Toolbox Talks documentation will be given to the CMHP Project Safety Manager every Friday by 3 p.m.
 - (3) The documentation of weekly Toolbox Talks topics must include, as a minimum, the following:
 - (a) Name of company, project name and date.
 - (b) Special topics discussed for the project.
 - (c) Safety and health comments and suggestions from employees.
 - (d) Name of all employees in attendance.

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- (e) Signature of Subcontractor Foreman or Subcontractor Safety Representative who conducted the meeting.

7. Incident Reporting and Emergency Procedures

a. Subcontractor Employee Injury/Public Injury/Property Damage

- (1) The CMHP Superintendent and the CMHP Project Safety Manager will be notified immediately of subcontractor employee injuries, other injuries or property damage potentially involving subcontractor operations.
- (2) Subcontractors will be individually responsible for notifying OSHA within eight hours in the event of a fatality or a single incident in which five (5) or more employees are hospitalized.
- (3) Any time the Subcontractor's Superintendent is absent from the project, a responsible individual should be designated as an official representative with full authority to supervise and perform the duties listed herein.

b. Project Employee Incident Reports

A complete Incident Investigation Report and a copy of all Subcontractor Workers' Compensation Incident Reports from the project must be forwarded within 12 hours to the CMHP's Superintendent/Project Safety Manager.

c. Injury and Illness Reports

If required by contract, a copy of the Monthly Injury/Illness Report for each subcontractor of every tier must be forwarded to the Owner's Representative as soon as possible, but in no event later than seven (7) days after the end of each month.

8. General Safety Procedures

- a. All subcontractors should ensure that their employees, subcontractors and suppliers, regardless of tier, understand and agree to comply with their company's Safety and Health and HAZCOM Program, the Contract Documents, OSHA Standards and all other federal, state and local codes, laws and regulations. As a minimum, the Subcontractors' Safety and Health Programs must incorporate all of the principles of CMHP's Project Safety and Health Program and will list the steps the subcontractors intend to utilize for the prevention of incidents to their employees, fellow workers, the general public and property of all concerned.
- b. All subcontractors will submit their company's Safety and Health Program prior to the start of work. The Program will include, as appropriate, fall protection, stair and ladder use and personal protective equipment.
- c. All costs to CMHP associated with federal, state or local citations; fines, penalties and/or summonses resulting from a subcontractor's operation are the subcontractor's responsibility and will be back charged to the subcontractor.
- d. Subcontractors must provide their employees with all safety and personal protective equipment and weather protective gear required for the performance of their work and shall enforce its use as a condition of employment. The wearing of hard hats is required for the entire duration of the project.

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- e. All subcontractor employees must wear ANSI approved safety glasses with side shields or protective goggles at all times.
- f. Subcontractors will have a scheduled inspection and maintenance program for all tools and equipment.
- g. Subcontractors will have at least one employee qualified in First Aid on the project at all times.
- h. For emergency purposes, Subcontractors must submit to CMHP a list of key personnel and their telephone numbers.
- i. All scaffolds must be checked daily before each use for safety compliance. Scaffolds must not be left at anytime in an unsafe condition and will be removed immediately or tagged out if not to be used again.
- j. A Hot Work Permit must be obtained from CMHP's Superintendent or Safety Manager prior to any welding, torch cutting or burning.
- k. Positive six foot fall protection shall be followed at all times.

9. Subcontractor Safety and Health Enforcement Policy

- a. All Project Safety Representatives must be held accountable by their respective companies for the immediate correction of hazards and unsafe acts by their employees and their subcontractors and suppliers, regardless of tier and the compliance with their company's Safety and Health and HAZCOM Programs, the Contract Documents, OSHA Standards and all other federal, state and local codes, laws and regulations.
- b. Upon knowledge by CMHP of a safety hazard or unsafe act, verbal notification will be given to the subcontractor's employee. If the required correction does not occur immediately or within the time period specified by CMHP, verbal notification will be given to the Subcontractor's Project Safety Representative. If the Subcontractor's Project Safety Representative does not ensure correction and continuing safety compliance or if the risk so warrants, CMHP reserves the right to take whatever action is required to correct the hazard or unsafe act.
- c. This action may include any of the following:
 - (1) A stop work order for the specific operation or area of construction until the hazard or unsafe act is corrected.
 - (2) Correction made by CMHP or others with back charges to the responsible subcontractor.
 - (3) Written notification to the subcontractor's Project Manager/Project Executive and President and/or insurance company.
 - (4) Removal from the project of person responsible for the unsafe act.
 - (5) Replacement of the subcontractor's Project Safety Representative.

G. CONCLUSION

All employers are responsible for instructing their employees in the recognition and elimination

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of hazards and unsafe acts and the regulations applicable to their work. Safety training, good safety and health practices and appropriate immediate corrective action are the keys to preventing incidents, illnesses, loss of life and property damage, and a proactive approach to safety and health by all persons involved in the construction of a project is essential to the success of the Safety and Health Program. At all times , the applicable OSHA standards and the entire CMHP Safety and Health Manual is to be referenced for further safety requirements and is available upon request.

1. PURPOSE

The Code of Safe Practices is a general list of policies which have been developed to clarify specific requirements of the company safety and health program. It is not all inclusive, but provides an easy to read outline of different CMHP rules. In all cases specific sections of this manual should be referred to for clarification on a specific code, if needed.

2. SCOPE

This procedure applies in its entirety to all CMHP projects unless a variance from its requirements is granted by the Corporate Director of Safety and Health.

3. DEFINITIONS

Not applicable.

4. RESPONSIBILITIES

- (a) The Project Superintendent has overall responsibility for ensuring these codes have been relayed to all individuals on their projects.
- (b) The Project Safety Manager is responsible to assist the Project Superintendent in implementing and/or monitoring activities associated with these codes.
- (c) It is the responsibility of all managers and supervisory personnel to enforce these codes and of each employee to follow it.

5. GENERAL REQUIREMENTS

- 1. Employees shall observe and obey the safety and health requirements of the Project Safety Program, the Code of Safe Practices and all other established safety and health standards and regulations as are necessary to the safe and healthful performance of their work.
- 2. All Project employees will be subject to fair and consistent disciplinary action for policy noncompliance.
- 3. The possession or sale of illegal drugs, alcohol or weapons on this Project is strictly prohibited.
- 4. Employees must come to work on time, fit for duty and dressed in attire suitable for construction work, including shirts with sleeves, long trousers and proper work shoes. Additional protective gear requirements will depend upon the hazards associated with each task to be performed. **HARD HATS, ANSI APPROVED SAFETY GLASSES WITH SIDE SHIELDS, AND HIGHLY VISIBLE OUTER WEAR SHALL WORN BY EVERYONE AT ALL TIMES WHILE ON SITE FOR THE DURATION OF THIS PROJECT.**
See Section B-17 for more details.
- 5. Persons not directly involved with the on-site construction of this Project shall not enter the

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- site unless they obtain permission from a member of the Project Staff and sign a visitor release form. Visitors must wear a hard hat and safety glasses with side shields and comply with all other safety requirements as they apply.
6. All incidents and injuries must be reported to a supervisor immediately. Hazardous conditions and unsafe activities observed should also be reported to a supervisor so that corrective action can be taken.
 7. Employees must attend a weekly "Tool Box Talk" Safety Meeting and sign an attendance list.
 8. Blood may contain communicable diseases. Spilled blood and exposures to blood must be reported to a supervisor.
 9. Authorization from a supervisor is required for entry into confined spaces, trenches or enclosed areas that may contain a hazardous atmosphere.
 10. Labels on tools, materials and chemical containers must be read before use, and the instructions for the proper use, handling and personal protective equipment required must be followed.
 11. Glass bottles are not permitted on this Project.
 12. Materials, trash or other objects must not be thrown from buildings or structures. Anyone caught throwing material from upper levels will be subject to immediate dismissal.
 13. Materials must not be stored within six (6) feet of floor openings or within ten feet of open floor edges.
 14. Materials on roofs and open floors must be secured to prevent them from being wind blown.
 15. Objects must not be stacked or leaned in such a way that they could fall or be blown over.
 16. Protruding nails must be bent over or pulled as the work proceeds. Nails in job built guardrails, ladders or handrails must be pounded flush with the surface of the wood.
 17. The large muscles of the legs should be used instead of the smaller muscles of the back when lifting heavy objects. Help should be obtained when an object to be lifted may be too heavy or awkward to be handled safely by one person.
 18. Only trained and qualified employees may rig loads and signal cranes. Employees must be warned before loads are lifted overhead, and employees should stay out from under crane loads when it is avoidable. A crane load should not be approached for landing until it has been lowered to chest level. The use of tag lines to help control loads is required, especially for steel erection and during windy conditions.
 19. Employees must not stand between crane loads and other objects, and hands must be kept

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Subject: Code of Safe Practices

- clear of rigging and pinch points as loads are lifted and moved.
20. Employees should be aware of the locations of the fire extinguishers that have been provided throughout the Project and know how to select and use them.
 21. An ABC rated fire extinguisher must be readily available when welding or burning and when using flammable liquids and gases.
 22. Smoking is not permitted around gasoline and other flammable liquids or gases. Equipment must be turned off before refueling and extreme caution must be used with fuel around a hot muffler.
 23. Gasoline must be stored and transported only in approved safety containers and gasoline must not be used for cleaning purposes.
 24. Only qualified and authorized employees may operate temporary heating devices. Open fires are not permitted.
 25. Compressed gas cylinders must be kept secured and upright, and they must be capped and gases separated when not in use. Empties should be returned to the storage area for pick up.
 26. Tools and power cords must be inspected for damage or defects before each use. Any problem found must be reported to a supervisor and/or corrected before being put in service.
 27. Guards and other safety devices on tools and equipment must be kept in place and working properly.
 28. Specific training and certification cards are required for the operation of powder-actuated tools, lasers, powered industrial trucks, and for flagger personnel.
 29. The heads of striking tools must be kept properly dressed to prevent mushroom burrs from forming.
 30. Working above or below other operations creates a hazard from falling objects. Conflicting activities must be reported to a supervisor so that the activities can be coordinated.
 31. Overhead protection structures are to be used to enter or exit a building when they are provided.
 32. Areas that are separated from the main work areas by warning lines, control lines or barricades must not be entered by unauthorized employees. These areas are blocked off for safety reasons, and they may contain hazards that are not obvious.
 33. A full-body harness or other approved means must be used for fall protection at unguarded floor edges, floor openings and other fall hazards where the fall distance is six feet or more per the "Fall Protection Policy" in this manual. When guardrails, control lines or warning lines are temporarily removed, provisions to prevent unprotected employees from entering

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- the area must be provided.
34. Floor holes two inches and over must be covered, and the covers must be secured and marked. Specific state and federal OSHA regulations will be followed for specific types of work.
 35. Riding on trucks and heavy equipment is permitted only where a seat has been provided by the manufacturer, and seat belts must be used when they have been provided.
 36. Employees must not attempt to cross the path of a truck or a piece of heavy equipment unless eye contact is made with the operator and a "go ahead" signal is given. Employees must stay alert and keep clear of moving equipment.
 37. Scaffolds must be erected, altered, used and dismantled under the supervision of a competent person.
 38. A proper ladder must be used for access to a scaffold, work platform or another level. Climbing scaffold brace/frame is not permitted.
 39. Walkman, discmans, stereo radios and other types of personal radios may cause communication problems during an emergency and are prohibited at all times on CMHP Projects.
 40. Housekeeping is a prime concern and must be maintained at the highest level. Daily clean up is mandatory, especially for food rubbish. Left over or scrap materials must be removed from the work area daily.
 41. When ascending or descending a ladder, employees will use the three point system, e.g. one hand and two feet or two hands and one foot must be in contact with the ladder at all times.
 42. The use of cell phones while in the field on CMHP projects are to be limited to safe areas only. At no time shall any individual use a cell phone while operating any equipment or vehicle on CMHP projects.

Subject: Fitness for Duty Policy

1. FITNESS FOR DUTY

Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP) has a vital interest in maintaining a work environment that promotes the health, welfare, and safety of our employees and those with whom CMHP employees are in contact. Employees are expected to be fit for duty at all times. Being under the influence of drugs or intoxicants poses unnecessary and unacceptable safety and health risks, not only to the user but to all those who work with him or her. CMHP has enacted and will carry out reasonable measures it deems appropriate for ensuring a drug and alcohol free and safe workplace.

CMHP's Fitness for Duty Policy and Practices are detailed below. In summary, CMHP's policy with respect to the use or possession of drugs or intoxicants on CMHP Property, and with respect to reporting for work under the influence of any intoxicant, is one of "zero tolerance." If an Employee violates this policy, or if he or she is subjected to one of the testing procedures set forth in the policy and has a positive test result, or if an Employee refuses testing or inspections, as detailed in the policy, CMHP will terminate the Employee. If an Employee believes that he or she cannot perform safely or effectively, the Employee should inform his or her supervisor. To encourage voluntary disclosure, Employees who give CMHP notice in this fashion may be referred to the Employee Assistance Program and reassigned or placed on a leave of absence, rather than terminated, if CMHP deems such action appropriate.

The possession, transfer, manufacture, dispensation, distribution, sale, or use of drugs/and or alcoholic beverages on CMHP Property is not tolerated. No CMHP Employee, Subcontractor, or visitor shall report to work or to CMHP Property under the influence of intoxicants. Any Employee violating this policy will be terminated or, in the case of others, denied access to CMHP Property. In order to enforce this policy, all persons subject to the policy must take a Fitness for Duty Test upon request. Refusal to take the test will result in immediate termination for an Employee, and denial of access to CMHP Property for all other persons. Positive results from a Fitness for Duty Test shall be grounds for termination of employment. Further, CMHP reserves the right to perform inspections of persons, personal property, or vehicles located on CMHP Property or jobsites in order to assure a drug-free, alcohol-free workplace.

All searches, inspections, and testing will be performed with appropriate concern for personal privacy, dignity, and confidentiality. The results of Fitness for Duty testing will be considered a confidential record disseminated on a need-to-know basis or as may be legally required or permitted. Fitness for Duty test records shall not be maintained in personnel files. The discovery of illegal substances, drugs, stolen property, and other illegal acts may result in notification of proper law enforcement agencies.

CMHP reserves the right to amend this policy at its discretion or as necessary to comply with contract requirements or local, state, or federal laws, including but

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Subject: Fitness for Duty Policy

not limited to Department of Transportation requirements. CMHP further reserves the right to change the testing limits and panel procedures as advances in technology or other considerations warrant identification of the named substances or additional substances in different concentrations or through different screening techniques.

CMHP recognizes that chemical dependency is a serious health problem and encourages all Employees to seek assistance for such problems prior to becoming subject to discipline under this policy or other CMHP policies. Reasonable efforts will be made to provide any help requested by an Employee. Such requests will not excuse Employees from future compliance with CMHP standards of conduct or performance. All supervisors and those charged with administering this policy will use every effort to maintain strict confidentiality.

CMHP considers adherence to this policy to be essential and therefore a condition of employment.

2. Definitions

The following definitions pertain to the provisions of the Fitness for Duty Policy:

Applicant: Any person requesting employment with CMHP.

Benefits: Health, life, disability, leave, or other similar programs sponsored by CMHP for the exclusive use of its employees.

CMHP: The Clark/McCarthy Healthcare Partners, A Joint Venture, any affiliate or subsidiary of The Clark/McCarthy Healthcare Partners, A Joint Venture, or any Joint Venture in which The Clark/McCarthy Healthcare Partners, A Joint Venture, or a subsidiary or affiliate participates.

CMHP Property: Any property owned, rented, leased, or used by CMHP for business purposes including, but not limited to, construction sites, parking lots and vehicles, buildings, and undeveloped land.

Confirmatory Test Cutoff Limits: Level at which the presence of an Intoxicant is verified in urine using the gas chromatography/mass spectrometry (GC/MS) technique or through an enzyme, evidential breath test, or blood test for alcohol. Levels are identified on the Acknowledgment and Consent Form (Exhibit 3).

Drug: Any intoxicant made illegal by any local, state or federal law.

Employees: Management/Staff employees and field construction personnel compensated by or on leave from CMHP. This includes full time, part time, and temporary agency personnel.

Employee Assistance Program ("EAP"): A program sponsored by CMHP and staffed by professional persons to help with such problems as drug and alcohol dependency or

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abuse by providing confidential counseling and referral services to individual Employees as well as education and training to the work force. Use of EAP services following a positive result from a Fitness for Duty test does not necessarily prevent further disciplinary action, up to and including termination.

Employee Assistance Program Coordinator ("Coordinator"): A person designated by CMHP to act as primary liaison between Employees and the EAP.

Employee Assistance Program Counselor ("Counselor"): An employee of the EAP who is a professional counselor designated by the EAP to work as the EAP representative to CMHP.

Fitness For Duty Test: Urinalysis, evidential breath test or other test conducted by an independent laboratory selected by CMHP. When permissible by law and necessary for program management, samples may be collected by trained, authorized CMHP personnel. A positive result from a urinalysis means that an Intoxicant was present at or above Confirmatory Test Cutoff Limits in urine; a negative result means that an Intoxicant was not present at or above Confirmatory Test Cutoff Limits in urine. With respect to alcohol testing, when necessary, CMHP may use breathalyzer, saliva enzyme or blood tests to detect or confirm the presence of alcohol with these tests administered by an independent facility or authorized CMHP personnel. Appropriate procedures have been established to maintain a strict chain of custody and to maintain confidentiality of all test results.

Incident: An occurrence involving one or more Employees, including, but not limited to the following:

- Altercations on or about CMHP Property or jobsites.
- Accident on or about CMHP Property or jobsites involving bodily injury to an Employee or bystander or damage to any property.
- Possession of any Intoxicant on or about CMHP Property or jobsites.
- Accident involving damage to any property, including, but not limited to, CMHP vehicles and other equipment.
- Action or behavior which reasonably could have resulted in an accident or altercation.

Initial/Screening Test Cutoff Limits: Limits established for identifying the presence or absence of drugs in the urine. A positive result through this first test indicates the need for a confirmatory test.

Inspection: A Supervisor-conducted or CMHP-sponsored inspection of premises, including persons, personal property, or vehicles located on or about CMHP Property or jobsites, performed due to Reasonable Suspicion or an Incident, with reasonable regard given to the personal privacy and dignity of Employees.

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Subject: **Fitness for Duty Policy**

Intoxicant: Includes, but is not limited to, alcohol, ethanol (ethyl alcohol), amphetamines, barbiturates, hypnotics, cocaine, narcotics (opiates such as heroin, morphine, codeine, and methadone), PCP and other hallucinogens, marijuana and any other cannabinoid (e.g., hashish). The definition of Intoxicant also includes misused prescribed drugs and any other substance that adversely alters one's senses or affects one's ability to function in his/her job in a safe, productive manner. Intoxicants may include physician-prescribed or over-the-counter medication. Non-controlled substances (e.g., paints and glues) which are abused are also included in this definition.

Joint Venture: A partnership or corporation formed for a specific business purpose.

Management/Staff Employee: Any employee of CMHP not on the field payroll system.

Medical Review Officer (MRO): A licensed physician with knowledge of substance abuse disorders who is responsible for reviewing and interpreting confirmed positive test results obtained through the CMHP Fitness for Duty Testing Program. Prior to making a final decision to verify a positive test result for an individual, the MRO shall give the individual an opportunity to discuss the test results and provide medical documentation regarding any current treatment or prescribed drugs.

Random Drug Testing: A test, conducted at times selected by CMHP, to include a specified percentage of the employee population following conditions established in this policy. Each random selection is drawn from a pool of the names of all Employees or from the list of CMHP projects, including personnel previously tested, but excluding employees who may not be tested because of legal, regulatory or contractual agreements.

Reasonable Suspicion: A rational determination based on abnormal or unusual behavior or other observations or circumstances sufficient to lead a reasonable person to suspect that the Employee is using an intoxicant, is under the influence of an intoxicant, or is in possession of an intoxicant.

Sensitive Job: Job in which (a) the Employee's duties necessitate interaction with co-workers and/or the public on a regular and routine basis, (b) the Employee's impairment could pose a threat to the safety of co-workers and/or the public, and (c) the Employee's job function creates situations where an act (or failure to act) is likely to cause injury to others or damage to property. Jobs within this category include but are not limited to:

- Crane or other equipment operators
- Drivers or delivery persons
- Flagmen, messengers, power-tool operators
- Powder actuated tool operators
- Pilots

Supervisor: Any Employee who is responsible for assuring that the duties of another employee are satisfactorily carried out.

Subject: Fitness for Duty Policy

Under the Influence: A state brought about by the ingestion, inhalation, injection or absorption of one or more Intoxicants in such an amount that physical and/or mental control is noticeably diminished, and/or the employee's ability to work safely and effectively has been adversely affected by the Intoxicant(s), and/or Intoxicants were present at a level in violation of this policy or published limits.

3. Testing for Drugs and Alcohol

Applicants. All offers of employment are contingent upon an applicant receiving a negative result from a Fitness For Duty Test. Such test is voluntary but refusal to take the test will mean that the applicant has voluntarily withdrawn his/her application for employment. Should the test for an applicant who has not started work reveal intoxicants at or above the Confirmatory Limits, any offer of employment will be withdrawn. An Applicant who tests positive may be considered for employment after 180 days only with the approval of the Director of Human Resources, however, if such person is hired, then he or she shall be subjected to Regular Rehire Testing as deemed appropriate by CMHP at its discretion. An applicant may be allowed to start work pending receipt of the test result. If a negative test result is not received within 48 hours of providing the specimen, the applicant will be suspended without pay until receipt of the test result. Should the test result indicate intoxicants at or above the Confirmatory Limits, that applicant/employee will be terminated immediately, and will not be eligible for re-hire until 180 days later. The applicant/employee may only be considered for rehire with the approval of the Director of Human Resources.

Employees. Employees are required to take a Fitness for Duty Test under the circumstances outlined below and agree to do so. Employees will sign a Consent Form that will be maintained on file in the Human Resources Department (Exhibit E3). If the form is not signed, an Employee must still take all requested testing, or be subject to termination.

- Incident Testing: All Employees involved in an Incident will be asked to take a Fitness for Duty Test immediately following the Incident. If immediate testing is not possible, the test must be performed within 24 hours of the Incident. Such test is voluntary, but failure to take the test will result in termination.
- Sensitive Job Testing: Employees in Sensitive Jobs may be asked to take a Fitness for Duty Test on a regular basis (at least once every 6 months) at unannounced times and places. Such test is voluntary, but failure to take the test will result in termination. Employees in Sensitive Jobs will be identified and notified in writing prior to being required to submit to a Fitness for Duty Test.
- Reasonable Suspicion Testing: Any Employee whose behavior is such that there is a Reasonable Suspicion the Employee is using an

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Intoxicant will be asked to submit to a Fitness for Duty Test. Such test is voluntary, but failure to take the test will result in termination.

- Random Testing: A percentage of the Employee population will be required to take a Fitness for Duty Test at unannounced times and places. The testing population will be identified through selection procedures used to assure equitable distribution in the selection process. Selection for Random Testing is independent of any other provision or selection criteria for any other testing (pre-employment, incident, sensitive job, or reasonable suspicion) under the Fitness for Duty program. Such test is voluntary, but failure to take the test will result in termination.
- Periodic Site Testing: The Employee population will be required to take a Fitness for Duty Test at unannounced times, places, and projects. Selection for Periodic Site Testing is independent of any other provision or selection criteria for any other testing (pre-employment, incident, sensitive job, or reasonable suspicion) under the Fitness for Duty program. Such test is voluntary, but failure to take the test will result in termination.
- Regular Rehire Testing: If an Employee is terminated for any violation of this policy and rehired in accordance with the terms of this policy, the Employee, upon being rehired, shall be subject to all types of testing listed above and shall also be requested to submit to Fitness For Duty Testing from time to time as determined by CMHP in its discretion, to ensure that the Employee remains Intoxicant free.

Verification. All urinalysis tests which show a positive level of intoxicant in the initial screening will be confirmed by retesting of the specimen using a technique known as gas chromatography/mass spectrometry (GC/MS) or other verification technology. If the retest reveals levels of intoxicants beyond the Confirmatory Test Cutoff Limit (a positive result), the Applicant/Employee will be contacted by the MRO. An Applicant/Employee may rebut a positive test result with an additional test using the original specimen. The additional test must have been requested in writing within 24 hours (or the next business day) of the Applicant/Employee being notified by CMHP of the positive result from the initial Fitness for Duty Test. The additional test must be at a laboratory approved by CMHP, and the Applicant/Employee must pay all costs associated with the additional test. If the result of the retest is negative and if CMHP is satisfied that the initial test was in error, CMHP may accept the negative result, and reimburse the cost of the additional test for the applicant/employee. Other tests such as breathalyzer and blood tests may be subject to verification based on technology and legal requirements. Refusal to submit includes adulteration of the urine sample by addition of any substance to the urine sample that is meant to mask or hide the presence of drugs or alcohol, failure to provide adequate urine for controlled substances testing without a valid medical explanation after he or she has received notice of the requirement for urine testing in accordance with the provisions of this part, failure to provide blood or breath for

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controlled substances or alcohol testing without a valid medical explanation after he or she has received notice of the requirement for blood or breath in accordance with the provisions of this part, engaging in conduct that clearly obstructs the testing process, and/or leaving the scene of an on the job accident.

Medication/Prescription Drugs/Physician's Care. After submitting to a Fitness for Duty Test, an Employee may voluntarily provide the Medical Review Officer with documentation indicating that a positive result from the Fitness for Duty Test could have been caused by ingesting medication or prescription drugs as directed by his/her physician. If such evidence is presented to and accepted by the Medical Review Officer, a positive test result will not result in termination unless Intoxicant levels indicate dosages in an amount in excess of that prescribed.

4. Disciplinary Rules

Penalties for Certain Violations Other Than a Positive Fitness For Duty Test.

- Possession, use, sale, transfer, manufacture or distribution of a drug/alcohol while on or about CMHP Property or jobsites will result in disciplinary action up to and including termination.
- Criminal conviction based upon (a) sale, transfer, distribution, or possession with the intent to distribute drugs or (b) manufacture of drugs, will result in immediate termination. If an Employee is convicted under any criminal drug statute for a violation, he/she must notify CMHP within five (5) days of the conviction. If the Employee is working on a Federal Government project, CMHP must notify the contracting agency within ten (10) days of receiving notice from the Employee of any such conviction. Failure of an Employee timely to notify the Company will result in termination. Prior to trial or a plea, an Employee who is charged with any such crime may, in CMHP's discretion, be subject to suspension, Fitness For Duty Testing, required counseling, or, in CMHP's sole discretion, termination.
- Appearing for work at any location while Under the Influence of Intoxicants will result in immediate termination.
- Using a CMHP vehicle during non-working hours, or for personal reasons, while being Under the Influence of Intoxicants shall be the basis for disciplinary action by CMHP in its discretion, including counseling, revocation of vehicle use, suspension or, if appropriate, termination.

Termination for Positive Test Result from a Fitness For Duty Test.

Subject: Fitness for Duty Policy

For a positive result from a Fitness For Duty Test by an Employee, the Employee will be terminated.

Rehire.

An Employee may apply for rehire after 180 days from termination, upon providing evidence, approved by the Director of Human Resources, satisfactory to CMHP in its sole discretion, of the Employee's rehabilitation. The individual, if rehired, shall be subject to Regular Rehire Fitness For Duty Testing for a period of up to three (3) years after returning to employment. Failure to agree to such testing shall subject the Employee to termination.

Disciplinary Rules for Voluntary Disclosure of Use of Intoxicants.

Employees who voluntarily disclose their use of drugs or intoxicants, or misuse of alcohol prior to being requested to test may be directed, at CMHP's sole discretion, to seek assistance from the Employee Assistance Program as described in this policy. Further, after such disclosure, CMHP may require that the Employee take a Fitness For Duty Test. If an Employee decides not to consult with the EAP counselor, or if after consultation, elects not to seek prescribed or recommended treatment, the Employee shall be terminated if a Fitness For Duty Test results in a positive test. If working with an EAP counselor is recommended by CMHP and the Employee agrees, during the period that the Employee is working with the EAP counselor, at CMHP's discretion, the Employee may be placed on administrative leave with or without pay or may be reassigned to a different position, as deemed appropriate by CMHP, under such conditions as CMHP deems advisable. CMHP also encourages that Employee to seek the support of programs available in the community.

5. Employee Assistance Program

CMHP retains the services of an Employee Assistance Program to help Employees recover from chemical dependency either through self-referral or CMHP-recommended referral. The use of EAP may, but does not necessarily, prevent termination of employment.

The specific functions of the EAP when working with an Employee who voluntarily discloses use of drugs or intoxicants, or misuse of alcohol, or who is referred to EAP otherwise, are as follows:

- The EAP Counselor (working with the Coordinator and/or Supervisor) will identify and assess the Employee's problem, taking into consideration the Employee's psychological history and current job duties and responsibilities.
- The EAP Counselor will identify the most appropriate form of treatment available for the Employee, taking into consideration the Employee's needs, health plan coverage, and current job duties and

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responsibilities. Treatment may include, but is not limited to, short term counseling by the EAP Counselor, referral to outside treatment facilities, or hospitalization.

- CMHP may enter into an agreement with the Employee which specifies the Employee's obligations throughout the treatment period (e.g. attendance at treatment sessions).
- The EAP Counselor will document and monitor the Employee's progress and stay in contact with the Employee's Supervisor and/or the Coordinator.
- When the Employee completes the program recommended by the EAP, CMHP and/or the EAP Counselor may recommend follow-up treatment and may prepare an "After-Care" contract setting forth the Employee's continuing obligations.

6. Status of Employment Benefits

While an Employee is undergoing treatment supervised by the EAP, his/her compensation will be based on applicable benefit plans and the terms of CMHP's Family and Medical Leave policy. Certifications by a treating physician or clinician may be required by CMHP.

Benefits eligibility is based on the terms and conditions in CMHP's benefit plans. Field Employees represented by a union should contact a union representative to determine benefit eligibility.

7. Company Sponsored Events

If alcohol is served at CMHP-sponsored events, Employees attending such functions are required to comply with all applicable liquor and traffic control laws as well as CMHP's standards of conduct.

Clark/McCarthy Healthcare Partners, A Joint Venture Employee Policy Manual

Subject: Fitness for Duty Policy

The Clark/McCarthy Healthcare Partners, A Joint Venture

FITNESS FOR DUTY POLICY

ACKNOWLEDGEMENT, CONSENT, AND AGREEMENT TO COMPLY

I have been given a copy of the Fitness for Duty Policy of The Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP) and have had the opportunity to read the policy and ask questions. I have been warned by CMHP that I should not use drugs or intoxicants, or misuse alcohol. I understand that the Policy applies to me and my compliance with it is a condition of employment. CMHP has an Employee Assistance Program (EAP) which is available to provide help to Employees who voluntarily disclose a drug, intoxicant or alcohol problem. The Policy includes post-incident (positive results may eliminate or reduce workers' compensation benefits) reasonable suspicion, random, sensitive job, site and rehire testing. A positive test will result in termination. I may refuse such tests, but refusal to take the tests will result in termination of my employment or if I am an applicant, I will not be offered employment.

I understand that if I am subject to drug testing and choose to be tested, a sample of my urine will be collected by a trained collector at a site chosen by CMHP; I must verify my identity and follow normal collection procedures; I may provide my specimen in private unless there is a reason to believe I am attempting to submit an adulterated, altered or substitute specimen. My specimen will be identified and sealed in my presence and sent to a CMHP-selected, certified laboratory to be analyzed for the presence of drugs or intoxicants in the specified concentrations unless I am physically unable to do so under which circumstances CMHP may authorize the testing. If evidence of drugs or intoxicants is detected in my specimen, the laboratory will forward the results to the medical review officer (MRO) retained by CMHP and the MRO will make reasonable attempts to contact me and will consider any explanation or rebuttal I offer to explain my test results; the Policy allows retests of the same specimen at my expense by a certified laboratory selected by me and approved by CMHP if such request is received by CMHP within 24 hours of notification to me of the positive result; if the retest fails to find evidence of drug or intoxicant use, CMHP will rescind my prior termination and will pay lost wages (except overtime); and CMHP will give me a copy of my test results.

For alcohol testing, I must provide breath, saliva, and/or blood specimens to measure alcohol concentration either at the work site or at a clinic or laboratory; and if my alcohol test results in a concentration greater than the levels specified, the test will be deemed to be positive and I will be subject to termination.

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Subject: Fitness for Duty Policy

DRUG OR INTOXICANT	INITIAL/SCREENING TEST CUTOFF LIMITS	CONFIRMATORY TEST CUTOFF LIMITS
Amphetamines (Bennies, speed, uppers, dexies, hearts, whites, crank)	1,000 ng/mL	500 ng/mL
Cannabinoids (Marijuana, pot, weed, grass, hash, joint, reefer)	20 ng/mL	10 ng/mL
Cocaine (Coke, crack, snow, crystal, nose candy, mother of pearl)	300 ng/mL	150 ng/mL
Opiates (M., Miss Emma, smack, gum dust, schoolboy, juice, percs)	300 ng/mL	300 ng/mL
Phencyclidine (PCP, angel dust, killer weed)	25 ng/mL	25 ng/mL
Alcohol (Hooch, booze)	.02 g/dL	.02 g/dL

CMHP reserves the right to change this panel

I hereby acknowledge receipt of and consent to abide by this policy, including testing for drugs, intoxicants and alcohol in the circumstances described in the policy. In the event that I am physically unable to consent to testing, by signing below I hereby consent to be tested as required.

Print Name: _____ Social Security Number: _____

Employee/Applicant Signature: _____

Date: _____

EMPLOYEE ORIENTATION & TRAINING CHECKLIST

☐ **CMHP EMPLOYEE** ☐ **SUBCONTRACTOR** ☐ **TRANSFER**

Project Name: _____ Project Number: _____

Employer: _____ Other: _____

Employee Name: _____ Employee # _____

PROJECT ORIENTATION

Review each item applicable with worker and place a check in the box when complete.

- | | |
|---|---|
| <input type="checkbox"/> Received a copy of the CMHP Safety & Health Handbook | <input type="checkbox"/> Incident Notification Responsibilities |
| <input type="checkbox"/> Emergency Action Plan | <input type="checkbox"/> First Aid Kit – CMHP / Subcontractors |
| <input type="checkbox"/> Access and Egress | <input type="checkbox"/> Fire Extinguisher Locations |
| <input type="checkbox"/> Location of MSDS | <input type="checkbox"/> Housekeeping |
| <input type="checkbox"/> Other: _____ | <input type="checkbox"/> PPE |

I have received the CMHP Safety & Health Handbook and received a hardhat sticker prior to working on this project. I have received a site specific orientation prior to starting work. I understand that my welfare and my job depend on my compliance and observance to all safety policies and procedures. I further understand that any violation of safety policies, procedures, and/or rules may cause me to receive discipline up to and possibly including termination from CMHP employment, and/or removal from CMHP projects.

Employee Signature: _____ Orientation Sticker # _____

Orientation Conducted By: _____ Date: _____

EMPLOYEE TRAINING

The employer shall instruct each of their employees in the recognition and avoidance of unsafe conditions and the regulations applicable to the work environment to control or eliminate any hazards or other exposures to illness or injury. The following training is to be completed by the employer if applicable:

	Date
I have received Hazard Communication Training as required by OSHA 29 CFR 1926.59.	_____
I have received Fall Protection Training as required by OSHA 29 CFR 1926.500.	_____
I have received Stairways and Ladders Training as required by OSHA 29 CFR 1926.1050.	_____
I have received Scaffold Training as required by OSHA 29 CFR 1926.450.	_____
I have received Fire Extinguisher Training.	_____

Employee Signature: _____ Employee # _____

Training Conducted By: _____ Date: _____

For CMHP Employees Only: Please send or fax to the Safety Department at (301) 272-8502 and retain a copy in the project files.

LISTA DE ENTRENAMIENTO Y ORIENTACIÓN DEL EMPLEADO

☐ EMPLEADO DE CMHP ☐ SUBCONTRATISTA ☐ TRANSFERIDO

Nombre del proyecto _____ Número del proyecto _____

Empleador _____ Otro _____

Nombre del empleado: _____ Número del empleado _____

ORIENTACIÓN DEL PROYECTO

Revise cada opción aplicable con el trabajador y complete colocando una marca en la caja correspondiente.

- | | |
|--|--|
| <input type="checkbox"/> Recibí una copia del manual de Salud y Seguridad de Clark | <input type="checkbox"/> Responsabilidades de notificación de incidente |
| <input type="checkbox"/> Plan de acción de emergencia | <input type="checkbox"/> Botiquín de Primeros auxilios de Clark/ Subcontratistas |
| <input type="checkbox"/> Egreso y Acceso | <input type="checkbox"/> Ubicación de Extintores de fuegos |
| <input type="checkbox"/> Ubicación de MSDS | <input type="checkbox"/> Limpieza |
| <input type="checkbox"/> Otro: _____ | <input type="checkbox"/> PPE |

Yo he recibido de Clark Construction Group, LLC el manual de seguridad y salud y recibí una etiqueta para mi casco antes de comenzar a trabajar en este proyecto. He recibido una orientación específica antes de comenzar a trabajar. Yo comprendo que mi bienestar y mi trabajo dependen de mi cumplimiento y observación de todas las normas y procedimientos. También comprendo que cualquier violación de las normas de seguridad, procedimientos, y reglas pueden causarme a recibir disciplina y hasta terminación del empleo de Clark, y / o ser removido de los proyectos de Clark.

Firma del empleado: _____ Etiqueta de orientación _____

Orientación conducida por: _____ Fecha _____

ENTRENAMIENTO DEL EMPLEADO

El empleador debe instruir a cada uno de sus empleados en el reconocimiento y como evadir condiciones inseguras y las regulaciones aplicables al ambiente de trabajo para controlar o eliminar cualquier peligros u otras exposiciones a enfermedades o heridas. El siguiente entrenamiento debe ser completado por el empleador si es aplicable:

He recibido Entrenamiento en Comunicación de Peligros como lo es requerido por OSHA 29 CFR 1926.59 _____

He recibido Entrenamiento en Protección de Caídas como lo es requerido por OSHA 29 CFR 1926.500 _____

He recibido Entrenamiento en Escaleras y Escalones como lo es requerido por OSHA 29 CFR 1926.1050 _____

He recibido Entrenamiento en Andamios como lo es requerido por OSHA 29 CFR 1926.450 _____

He recibido Entrenamiento en Extintores de Fuego _____

Firma del empleado: _____ No. de empleado _____

Entrenamiento conducido por: _____ Fecha: _____

Favor enviar el fax al Dept. de Seguridad al (301) 272-8502 y retenga una copia en los archivos del proyecto.

JHA/TOOLBOX TALKS DOCUMENTATION

SUBCONTRACTOR: _____

DATE: _____

TRAINER: _____

SUBJECT: _____

PROJECT NAME AND No. _____

EMPLOYEE NAME	SIGNATURE	DATE	REMARKS
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			

This form certifies that the training identified above has been conducted with those employees listed on this form.

Clark/McCarthy Healthcare Partners, A Joint Venture Safety and Health Manual

Subject: Job Hazard Analysis and Control

1. PURPOSE

To establish the minimum requirements for Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP) and its subcontractors for job hazard analysis and control.

Some tasks, by their nature, can expose employees to the risk of injury. To make them as safe as possible, such work activities require special planning and training. Job Hazard Analysis (JHA) is a process to identify the hazards or risks associated with a task or work activity and to be systematically address them. A thorough JHA is also an excellent tool to train employees performing the task and to solicit their input into the safe execution of the task or activity.

2. SCOPE

This procedure applies in its entirety to all CMHP projects unless a variance from its requirements is granted by the Corporate Director of Safety and Health.

3. DEFINITIONS

Not applicable.

4. RESPONSIBILITIES

- (a) The Project Superintendent has overall responsibility for establishing and ensuring compliance with this procedure.
- (b) The Project Safety Manager is responsible for implementing and/or monitoring activities associated with this procedure.
- (c) It is the responsibility of all managers and supervisory personnel to enforce this procedure and to ensure that each employee follows it.

5. GENERAL REQUIREMENTS

Not Applicable.

6. IMPLEMENTATION

- (a) Job Hazard Analysis. The JHA is a method of evaluating a job, task, or activity to determine the safest, most efficient way in which it may be accomplished. The JHA process directly carries out two basic safety principles:
 - 1. It determines the potential incident causes by detecting the hazards inherent in a job.
 - 2. It eliminates potential incident causes by eliminating identified potential hazards.
 - 3. The JHA process has three basic components:

Subject: Job Hazard Analysis and Control

- Determining the basic steps of a job or task.
 - Identifying potential hazards that are associated with each step.
 - Developing solutions for eliminating or controlling the hazards.
- Once these phases are complete, the result is a written end product that describes the sequence of basic job steps, the potential for incidents and/or hazards and the recommended safe work practices or procedures to be followed for each.

- (b) Job Hazard Analysis Development Responsibilities. The JHA process ideally involves both employees and supervisors working together to develop safe work practices and procedures that can be practically implemented into the process. Employee participation is essential in having practical input and involving the employees who will actually perform the work contributes to the successful and safe completion of the work. The key to a successful JHA is total management commitment to see that it gets done.

By “walking through” the steps involved in a particular job assignment, the employee and the supervisor develop an increased awareness of potential hazards and an understanding of how “shortcuts” can result in dangerous situations or conditions.

- (c) Job Hazard Analysis Worksheet. This JHA worksheet (see Attachment 2; also see Attachment 3 for a sample worksheet) has been selected to simplify and document the JHA process. The left column, the Sequence of Basic Job Steps, is for listing the steps in the order in which they would logically occur from the beginning to the end of the process. The middle column, Potential hazards, is for listing all of the hazards associated with each step listed in the left column. The right column, Recommended Safe Job Procedures, is for identifying the best method of eliminating or controlling the hazard.
- (d) Job Hazard Analysis Development on Projects. Most supervisors have a large number of tasks or jobs regularly performed by their employees. The needs of every project quite often differ. The following should be considered when determining the work to be analyzed:

1. Incident or injury frequency.
2. New tasks or jobs.
3. On-routine tasks or jobs.
4. Unusual tasks or jobs.
5. Tasks or jobs using new technology.
6. Tasks or jobs using hazardous materials.
7. Tasks or jobs with new or inexperienced workers.
8. Tasks or jobs that have a greater potential for incident or injury.

Each time a crew begins a new task, they should jointly prepare a Job Hazard Analysis using the mini-JHA form at the end of this section. For crews that do essentially the same thing every day, the JHA should be reviewed at least once a week. Crews that perform several different tasks in a day should prioritize those

Clark/McCarthy Healthcare Partners, A Joint Venture
Safety and Health Manual

Subject: Job Hazard Analysis and Control

tasks and prepare a mini-JHA form for the most important each day until they are all completed.

The Foreman should lead the crew through the process utilizing their input rather than doing the work for them.

(e) Benefits of a Job Hazard Analysis.

1. Demonstrating management's interest in and commitment to safety.
2. Giving employees a voice in suggesting better methods.
3. Focusing supervisors and employees on safety.
4. Defining safety goals for continued improvement.
5. Joining workers and supervisors into a working partnership.
6. Removing guess work and chance when doing a job.
7. Standardizing training.
8. Job Hazard analysis can reduce costs by:
 - Structuring training to control safety, quality, and costs.
 - Controlling losses.
 - Increasing efficiency through improving and standardizing operating procedures.
 - Helping solve engineering problems.
9. Job Hazard Analysis improves operations by:
 - Promoting standard operating procedures.
 - Allowing for follow up job observations.
 - Facilitating the use of new technology.
 - Improving job performance through coaching, training, and teaming.
 - Planning the work.

7. EXHIBITS/ATTACHMENTS

- (a) JHA Phase List (Exhibit A).
- (b) JHA Worksheet (Attachment 1).
- (c) JHA Sample Worksheet and Procedure (Attachment 2).

**Clark/McCarthy Healthcare Partners, A Joint Venture
Safety and Health Manual**

Subject: Job Hazard Analysis and Control – JHA Phase List – Exhibit A

A. PHASES OR TYPES OF WORK TO CONSIDER

1. Site-work, Clearing and Grubbing
2. Demolition
3. Excavations, Trenching, Shoring
4. Tunneling
5. Foundations/Piling
6. Concrete - Structural and Architectural
7. Steel Erection
8. Curtain Walls/Precast Erection
9. HVAC
10. Plumbing/Pipe fitting
11. Electrical, Instrumentation
12. Process Systems Erection, Assemble and Tie-In
13. Roofing
14. Marine Exposures
15. Miscellaneous

B. HAZARDS TO ADDRESS

As a minimum (for each phase) consider all potential hazards including those below.

1. Noise
2. Dust/Fumes/Mists/Chemical Exposures
3. Traffic Control
4. Falls, Working at Heights
5. Falling Objects/Flying Objects
6. Walking Surfaces/Access/Work Platforms & Scaffolding
7. Lighting
8. Radiation
9. Machinery/Vehicles
10. Interface with other contractors
11. Security
12. Pollution/Spills
13. Utilities Exposure Including Electrical, Gas, Water (onsite and Public)
14. Vibration/Subsidence/Ground Support/Trenching and Excavations
15. Fires, Welding, Burning Operations/Fire Prevention
16. Clothing/PPE Requirements
17. Craning/Hoisting/Rigging
18. Signage/Barricades
19. Tools-use, Inspection, Maintenance
20. Demolition Operations
21. Protection of the Public
22. Other Hazards Particular to this Project.

Note: If the work to be done does not have any of these hazards, note this and move on to the next item.

C. PROCEDURES

For each phase and major type of work where a hazard is identified, spell out a simple procedure with the following components as a minimum.

1. Outline Purpose and Scope (overview)
2. Delegate Responsibilities
3. Identify Training Requirements
4. Identify specific Project conditions and circumstance and how to apply this procedure
5. List reporting and record keeping requirements
6. Determine emergency actions and responses needed in event of a failure of the plan.

Note: Generic Hazard Analyses may be written for routine tasks. These could be used as a basis for writing the specific analyses for the immediate job. Provided each Hazard Analysis addresses any special hazards to the current job, the generic Hazard Analyses can save preparation time.

D. EMERGENCY ACTION PLANS AND CONTINGENCIES

Emergency action plans and contingencies should be developed for each phase. The following should be addressed as a minimum:

1. Floods.
2. Chemical Spills and Leaks.
3. Fires.
4. Electrical Outage and Emergency.
5. Collapse or Failure of Supports.
6. Injury; Minor, Major & Fatalities.
7. Catastrophe.
8. Severe Weather Procedures.
9. Earthquake.
10. Job specific occurrences not listed above.

Attachment 1

JOB HAZARD ANALYSIS

Page ____ of ____

Date _____

Project Name _____

Phase _____

Contractor _____

Location _____

[illegible]

Attachment 2
SAMPLE JOB HAZARD ANALYSIS

Page 1 of 3

Date _____

Project Name _____

Phase General Sitework, Clearing and Grubbing

Contractor _____

Location Right Wing of Building

ACTIVITY/OPERATION	UNSAFE CONDITION, ACTION OR HAZARD	PREVENTIVE OR CORRECTIVE ACTION
1. Sitework preparation.	Unauthorized personnel entering the site.	Signs and/or barricades/fencing will be provided.
2. General sitework.	Construction vehicles crossing sidewalks and	Warning signs/flagger(s) will be posted.
	roadways.	
	Non-construction personnel slip/trip on mud and	Sidewalk roadway maintenance personnel and
	rocks outside the site.	equipment will be provided. (Sweep and clean.)
	Flaggers and other workers exposed to contact by	Orange vests/reflective clothing will be worn by
	non-construction vehicles along roadway.	exposed employees.
	Employees exposed to contact by construction	Back-up alarms/warnings/horns/lights/mirrors will
	vehicles and heavy equipment.	be provided. Employees will be trained to make
		eye contact with the operator and receive a "go
		ahead" signal from the operator before attempting
		to cross the path of a vehicle or equipment.
	Employees falling from vehicles and heavy	Employees may ride only where seats are provided
	equipment.	by the manufacturer. Seatbelts will be worn when
		provided.
	Equipment contact with overhead powerlines.	Relocate lines. (First choice.)
		Maintain safe working distance. See OSHA 1926
		Standard for minimum clearance table.
		Warning signs/high visibility streamers/barricades/
		protective insulation will be used as needed.

Attachment 2
SAMPLE JOB HAZARD ANALYSIS

Page 1 of 3

Date _____

Project Name _____

Phase General Sitework, Clearing and Grubbing

Contractor _____

Location Right Wing of Building

ACTIVITY/OPERATION	UNSAFE CONDITION, ACTION OR HAZARD	PREVENTIVE OR CORRECTIVE ACTION
3. Fueling equipment and fuel storage.	Chemical hazards.	MSDS's will be reviewed with employees before they handle chemicals.
	Mix-up of fuels.	I.D. label fuel tanks and containers; for example, "Gasoline", "Diesel", etc.
	Drip/spill/leak of fuel.	Lined berm or other means of containment will be provided for fuel tanks.
		Drips/spills/leaks will be cleaned up and disposed of as hazardous waste.
	Tank or container damaged/ruptured.	High visibility warning barricade or barrier.
	Fire hazards.	The phone number for the Fire Department and the Fire Emergency notification procedures will be posted in the Company's office trailer.
		Fuel trucks will be used to minimize stored fuels where practical.
		Proper tanks and metal safety containers will be used to store fuel on site.
		Tanks and container piles will be stored 20 feet from buildings.

[illegible]

INSTRUCTIONS FOR COMPLETING THE JOB HAZARD ANALYSIS FORM

Job Hazard Analysis (JHA) is an important accident prevention tool that works by finding hazards and eliminating or minimizing them before the job is performed and before they have a chance to become accidents. Use a JHA for job clarification and hazard awareness, as a guide in new employee training, for periodic contacts and for retraining of senior employees, as a refresher on jobs that run infrequently, as an accident investigation tool and for informing employees of specific job hazards and protective measures.

Set priorities for doing JHA's: jobs that have a history of many accidents, jobs that have produced disabling injuries, jobs with high potential for disabling injury or death, and new jobs with no accident history.

SEQUENCE OF BASIC JOB STEPS

Examining a specific job by breaking it down into a series of steps or tasks, will enable you to discover potential hazards employees may encounter.

Each job operation will consist of a set of steps or tasks. For example, the job might be to move a box from a conveyor in the receiving area to a shelf in the storage area. To determine where a step begins or ends, look for a change of activity, change in direction or movement.

Picking up the box from the conveyor and placing it on a handtruck is one step. The next step might be to push the loaded handtruck to the storage area (a change in activity). Moving the boxes from the truck and placing them on the shelf is another step. The final step might be returning the handtruck to the receiving area.

Be sure to list all the steps needed to perform the job. Some steps may not be performed each time; an example could be checking the casters on the handtruck. However, if that step is generally part of the job it should be listed.

POTENTIAL HAZARDS

A hazard is a potential danger. The purpose of the Job Hazard Analysis is to identify **ALL** hazards--both those produced by the environment or conditions and those connected with the job procedure.

To identify hazards, ask yourself these questions about each step:

Select a job to be analyzed. Before filling out this form, consider the following: The purpose of the job--What has to be done? Who has to do it? The activities involved--How is it done? When is it done? Where is it done?

In summary, to complete this form you should consider the purpose of the job, the activities it involves, and the hazards it presents. If you are not familiar with a particular job or operation, interview an employee who is. In addition, observing an employee performing the job, or "walking through" the operation step by step may give additional insight into potential hazards. You may also wish to videotape the job and analyze it.

Here's how to do each of the three parts of a Job Hazard Analysis:

Is there a danger of the employee striking against, being struck by or otherwise making injurious contact with an object?

Can the employee be caught in, by or between objects?

Is there potential for slipping, tripping or falling?

Could the employee suffer strains from pushing, pulling, lifting, bending or twisting?

Is the environment hazardous to safety and/or health (toxic gas, vapor, mist, fumes, dust, heat or radiation)?

Close observation and knowledge of the job is important. Examine each step carefully to find and identify hazards--the actions, conditions and possibilities that could lead to an accident. Compiling an accurate and complete list of potential hazards will allow you to develop the recommended safe job procedures needed to prevent accidents.

List the recommended safe operating procedures. Begin with an action word. Say exactly what needs to be done to correct the hazard, such as, "lift using your leg muscles." Avoid general statements such as, "be careful."

List the required or recommended personal protective equipment necessary to perform each step of the job.

Give a recommended action or procedure for each hazard.

Serious hazards should be corrected immediately. The JHA should then be changed to reflect the new conditions.

Finally, review your input on all three columns for accuracy and completeness. Determine if the recommended actions or procedures have been put in place. Reevaluate the job hazard analysis as necessary.

RECOMMENDED ACTION OR PROCEDURE

Using the first two columns as a guide, decide what actions or procedures are necessary to eliminate or minimize the hazards that could lead to an accident, injury or occupational illness.

Begin by trying to: 1) engineer the hazard out; 2) provide guards, safety devices, etc.; 3) provide personal protective equipment; 4) provide job instruction training; 5) maintain good housekeeping; 6) insure good ergonomics (positioning the person in relation to the machine or other elements in such a way as to improve safety).

Clark/McCarthy Healthcare Partners, A Joint Venture Safety and Health Manual

Subject: Cranes/Rigging Operations

As required by the Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP) Safety and Health Manual, the following Crane and Rigging policy shall be adhered to. Below is a modified version of our Manual, Section: B-2 Crane Operations. The modified information below does not relieve Subcontractor of all requirements regarding the section referenced above. Upon request, we will provide this section of the policy to the Subcontractor.

CRANE REQUIREMENTS

The following documentation is required by CMHP when using the following type of cranes, where applicable:

TOWER CRANE PACKET CONTENTS:

- Ø Swing radius/site plan
- Ø Approved foundation (pad) design with PE stamp
- Ø When required to be tied to a structure, crane tie-in design(s) with PE stamp
- Ø Third party inspection records of soil compaction, reinforcing steel, and concrete testing for crane foundation
- Ø Tower crane erection permit (As required by locality)
- Ø Public space permit (As required by locality for swing)
- Ø Erection inspection/certification
- Ø Daily Inspections (by crane operator) **Written Inspections shall be turned into CMHP**
- Ø Quarterly Inspections (executed by crane rental company as applicable)
- Ø Annual Inspections (**as required, executed by third party at the completion of crane erection**)
- Ø Photocopy of Operator's license (As required by locality)
- Ø Copy of completed critical lift plans and checklists when applicable

MOBILE CRANE PACKET CONTENTS:

- Ø Name of competent person who inspects the crane prior to use
- Ø Photocopy of Operator's license (As required by locality)
- Ø Daily Inspections (by crane operator) **Written Inspections shall be turned into CMHP**
- Ø Any other periodic inspections
- Ø Annual Inspections (**as required, executed by third party at the completion of crane inspection**)
- Ø Maintenance records
- Ø Site plan including matting procedures (including building re-shore requirements when applicable) developed as a result of looking at the allowable bearing capacity of the surface versus the applied load. Needs to be done for all mobile cranes including crawlers. Provide geotechnical engineer's criteria for base compaction required.
- Ø Load charts including attachments for crane configurations used on that project
- Ø Copy of completed critical lift plans and checklists when applicable

RIGGER QUALIFICATIONS AND TRAINING

- (a) Riggers must be trained and competent for the task and must be capable of determining if equipment is damaged or not fit for a purpose. CMHP distinguishes three levels of Riggers (Rigger I, II & Master) as defined below.
- (b) Riggers must be familiar with the different and correct rigging techniques, and with all rigging equipment used.
- (c) Individuals must meet and/or exceed any federal/state OSHA, and CMHP training requirements to be qualified as a Rigger.
- (d) All projects shall designate competent Riggers.
- (e) Level I Rigger must have basic knowledge of the following:
 - Crane Communications (voice/radio)
 - Ø Must be in English
 - Standard Crane Hand Signals Including Tower Crane
 - Ø Must wear orange gloves or other specific identification
 - Rigging hardware; including:
 - Ø Hooks and similar attaching devices;
 - Ø Shackles, clips and clamps;
 - Ø Taglines; and
 - Ø Any other approved and used devices.
 - Synthetic/wire rope slings and chains
 - Common load configurations positioning
- (f) Level I Rigger shall demonstrate specific knowledge of crane operations, including:
 - Communications (voice/radio/hand);
 - Personal fall protection methods;

Subject: Cranes/Rigging Operations

- Emergency procedures; and
 - Hazards and restrictions associated with working adjacent to overhead electric lines and equipment.
- (g) Level II Rigger shall meet all of the requirements of a Level I Rigger plus have both 2 years experience and training in the safe application, use, and limitations of rigging equipment as applicable to the work performed, including:
- Come-along /chain hoist operations, Rigging hitches and knots, Anchor points, Synthetic ropes for rigging, Wire rope, Chains, Reeving, Spreader bars and equalizing beams, Synthetic slings, Lifting points, Dollies, Trollies, Tuggers and winches (manual and power), Bars and levers;
 - Fiber rope for rigging jacks, jacking systems, and rams, Links and rings, Plate clamps, Softeners, and Cable dogs/grips.
- (h) Master Rigger shall meet all of the requirements of a Level II Rigger plus have 5 years experience and training in the safe application, use, and limitations of rigging equipment as applicable to the work performed, including:
- Blind hoists, Traveling with the load, Work in close quarters, Personnel lifting procedures, Load dynamics, Load weight estimation or determination, Specific criteria from the manufacturer or equipment representative in the safe and appropriate methods of erection, dismantling, jumping, and reconfiguring of cranes, Specific criteria for lifting a single load with multiple cranes;
 - Load indicator devices, Capacity or load charts, Mechanical advantages, Center of gravity, Effects of angles or indirect pulling, Equipment capacity computations;
 - Drum/diameter (D/d) ratios, Vectors and angles, and Boom angles and road radius.

**Clark/McCarthy Healthcare Partners, A Joint Venture
Safety and Health Manual**

Subject: Cranes/Rigging Operations

This will certify that _____ (Subcontractor)
employees who will be identified as Riggers on the _____
_____ (Project) have been trained on Rigger
Qualifications and Training as required by CMHP's Safety and Health Manual, Section: B2 –
Crane Operations.

All Riggers will be identified by wearing orange gloves or a specified color hard hat.

(Signed by subcontractor company officer)

Clark/McCarthy Healthcare Partners, A Joint Venture Safety and Health Manual

Subject: Fall Protection

1. PURPOSE

To establish the minimum requirements for Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP) and its subcontractors for fall protection.

2. SCOPE

This procedure applies in its entirety to all CMHP operations unless a variance from its requirements is granted by the Corporate Director of Safety and Health. This procedure is to be used in conjunction with the "Ladders" and "Holes and Openings" sections of this manual.

3. DEFINITIONS

Not applicable.

4. RESPONSIBILITIES

- (a) The Project Superintendent has overall responsibility for establishing and ensuring compliance with this procedure.
- (b) The field safety and health staff is responsible for implementing and/or monitoring activities associated with this procedure.
- (c) It is the responsibility of all managers and supervisory personnel to enforce this procedure and of each employee to follow it.

5. GENERAL REQUIREMENTS

- (a) 100% fall protection is required when employees are working more than six (6) feet above lower/working levels for **all operations** unless otherwise noted in this program. If the fall distance is less than six (6) feet but the employee could fall into/onto dangerous equipment or other hazards exist, fall protection must be provided.
- (b) Fall Protection may consist of guardrail systems, safety net systems, personal fall arrest systems, or warning line systems within this program unless other wise noted.
- (c) All fall protection must be **positive** in nature, meaning there must be physical means to prevent an individual(s) from falling.

6. IMPLEMENTATION

- (a) All phases of work are to be preplanned out to determine the type of fall protection to be used.
- (b) All orientations shall include a review of this six foot policy.

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Safety and Health Manual

Subject: Fall Protection

- (c) All subcontracts shall detail out the six foot policy so there is no misinterpretation when the subcontractor arrives at the project.
- (d) All safe-starts shall cover this policy in detail.
- (e) CMHP has a Zero Tolerance Policy for fall protection infractions.
(See Attachment 1)
- (f) All individuals utilizing fall protection shall be properly trained on the procedures and equipment they will use. All training shall be documented and submitted to the Safety Department for review and filing with the project safety files. Subcontractors are solely responsible for their employee training. Subcontractor training documentation is outlined in Section A-14 of this manual.
- (g) Guardrail Systems. Guardrail systems are usually the first choice when the situation permits them. When used, they must meet the following requirements:
 - 1. Top rails of guardrail systems must be 42 inches above the walking/working surface plus or minus 3 inches. Guardrail systems must be able to withstand a force of 200 pounds in any outward or downward direction at any point along the top edge without deflecting to a height less than 39 inches. If wire rope is used for top rails, it must be flagged at not more than six-foot intervals with high visibility material.
 - 2. Midrails must be used between the top rail and the walking/working surface when there is no wall or parapet wall at least 21 inches high. Midrails must be able to withstand downward or outward pressure of 150 pounds.
 - 3. When guardrail systems are used around holes that are used as points of access (such as ladder ways), they must be provided with a gate or be so offset that a person cannot walk directly into the hole.
 - 4. A toe board shall be installed as part of each guardrail system. The toe board is required to be a minimum of 3½ inches high with a maximum of ¼ inch of clearance off the floor. The toe board members shall be installed to withstand a downward or outward force of 50 pounds. The distance between toe board members shall not be greater than 1 inch.
 - 5. For installation of wire rope guardrails, see Attachment 2 at the end of this section.
- (b) Safety Net Systems. Safety nets may be the only reasonable choice in some situations. They must meet the following requirements if used:

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Subject: Fall Protection

1. Safety nets must be installed as close as practicable under the walking/working surface but in no case more than 25 feet below [1926.105(c)(1)].
 2. They must extend outward from 8 to 13 feet depending on the vertical distance to the net.
 3. Unless it is unreasonable to do so, they must be drop-tested after installation, relocation, major repair, and at six-month intervals if left in one place [1926.502(c)(4)(1)].
 4. They must be inspected at least once a week for wear, damage, and other deterioration.
 5. Materials, scrap pieces, equipment, or tools that fall into the net must be removed as soon as possible and at least before the next shift.
- (c) Personal Fall Arrest Systems. The minimum personal fall protection system allowed for use on our projects shall consist of a full-body harness, a lanyard with a decelerating device such as a rip stitch, tearing, or deforming system built-into it and locking type snap hooks. Self retracting lifelines are an exception. If the individual is required to disconnect and re-connect at elevations greater than six feet above the next level, two lanyards will be required so one of them can be attached at all times. Double lanyards with one deceleration device are commercially available.
1. Lanyards and vertical lifelines must have a minimum breaking strength of 5,000 pounds. If vertical lifelines are used, each employee must have a separate lifeline. In construction of elevator shafts, two employees may be attached to one lifeline with a breaking strength of 10,000 pounds provided that both are working on a false car 1926.502(d)(10)(ii).
 2. Self-retracting lifelines and lanyards which automatically limit free-fall to two feet or less must have a minimum tensile strength of 5,000 pounds. A decelerating device and lanyard shall not be used with self-retracting lifelines. These shall be connected directly to the d-ring of the body harness.
 3. Personal anchorage must be independent of any anchorage being used to support or suspend platforms and must be capable of supporting 5,000 pounds.
 4. Personal fall arrest systems must be rigged so that the employee can neither free fall more than six feet nor contact any lower level. If the combined tool and body weight exceeds 310 pounds, modification of the system may be necessary.

Subject: Fall Protection

5. The attached point (D-ring) of the body harness must be located in the center of the wearer's back near shoulder level.
 6. Personal fall arrest systems may not be attached to guardrail systems unless they are designed for that purpose by a competent person and capable of supporting 5,000 pounds for each person attached.
 7. Positioning devices must be rigged so the employee cannot free-fall more than two feet. They must be secured to an anchorage capable of supporting 3,000 pounds.
- (d) Warning Line Systems. Warning line systems may be used on low-sloped roofs if they comply with section 1926.502(f).
1. The warning line must be erected around all sides of the roof work area. When mechanical equipment is not being used, it must be erected not less than six feet from the roof edge. When mechanical equipment is being used, the warning line must be not less than twelve feet from the parallel edge and not less than ten feet from the perpendicular edge.
 2. Warning lines must consist of ropes, wires or chains, and supporting stanchions erected as follows:
 - The rope, wire or chain must be flagged at not more than six-foot intervals with high visibility material.
 - Its lowest point, including sag, may be no less than 34 inches and the highest point not more than 39 inches.
 - Stanchions (after erected) must be able to withstand a force of 16 pounds applied horizontally against the stanchion 30 inches above the walking/working surface perpendicular to the warning line in the direction of the edge.
 - The rope, wire or chain must have a minimum tensile strength of 500 pounds.
 - The line must be attached to each stanchion such that pulling on the line in one section will not result in taking up slack in the adjacent section before the stanchion tips over.

7. EXCEPTIONS TO THE SIX FOOT POLICY

It is recognized that certain reasonable conditions may prevent full implementation of the fall protection policy. The few exceptions are as follows and will still require full compliance to all applicable OSHA regulations and alternative fall protection practices as noted:

- (a) Moving up and down ladders. Fall protection will be required when working from ladders and an individual's work requires him/her to lean out over the side rails of the ladder. Positive fall protection is also required if the ladder is being used adjacent to the perimeter of the building or when a floor opening and a worker

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are above the guardrail or perimeter protection. See the "Ladders" Section of this manual.

- (b) Unloading materials from trucks. Safe means of access to trailer decks is required.
- (c) Certain Residential Work. Due to the nature of residential work, the six foot fall rule may be substituted with a fall protection plan only under the direction of the Regional Safety and Health Director for the following operations:

- § Setting and bracing of roof trusses and rafters

- ü All trusses to be double rigged to eliminate climbing arch to unhook.
- ü Trusses are to be solid braced as per TPI guidelines to prevent collapse and enable recognized anchor point.
- ü Individuals may walk/work from the top plate only in areas where the fall exposure does not exceed one story.
- ü The top plate will be accessed using a secured ladder.

- § Installation of floor sheathing and joists

- ü Individuals may walk/work from the top plate only in areas where the fall exposure does not exceed one story.
- ü Once a deck has been established, a safe means of access is required.

- § Erecting Exterior Walls

- ü Guardrails shall be installed into all exterior walls and openings as they are being constructed, prior to lifting the wall into place.
- ü Stud walls constructed 18 inch on center or greater installed at a location where there is a fall exposure (through the stud wall) greater than six feet, will require a conventional guardrail system.

The fall protection plans for residential work shall include the training documentation for all exposed employees, the monitor, and competent person per OSHA regulations. All other residential work will fall under the six foot policy unless specifically exempted by the Corporate Director of Safety and Health and the Regional Safety and Health Director.

- (d) Scaffold Erection and Dismantling. During these phases of scaffold work, the competent person in charge may determine that six foot fall protection is infeasible. If this is determined, a fall protection plan shall be developed and submitted to the Regional Safety and Health Director for approval. The plan shall be very detailed to include the type, location, timeline, training, and reasonable measures of individual fall protection that will be made during the process. This exception shall apply only to free standing scaffolds where there are no feasible anchorage points for fall protection.

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- (e) Crane Cab Roof. Authorized employees who must access the crane cab roof to perform maintenance activities may do so without the use of a conventional fall protection system.
- (f) Union Jurisdiction Rules. Certain union jurisdictions prohibit their members from participating in six foot fall protection programs and thus will fall under both a site specific fall protection plan and all applicable OSHA regulations. These areas are very limited in nature and shall only be approved by the Corporate Safety and Health Director.

8. ATTACHMENTS

- (a) Zero Tolerance Policy (Attachment 1).
- (b) Wire Rope Rail Safety Requirements (Attachment 2).
- (b) Fall Protection Training Record (Attachment 3).
- (c) Fall Protection Training Update (Attachment 4).
- (d) Standard Form for Release of Floor or Stairs (Attachment 5).
- (e) Fall Protection Plans in Exception Cases (Attachment 6).
- (f) Fall Protection Violation Notice (Attachment 7).

Attachment 1

**Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP)
Zero Tolerance Policy for Fall Protection**

If a CMHP employee or subcontractor's employee violates CMHP's Fall Protection Policy, the following actions will be taken:

Safety Staff and/or Supervision will:

- Ø Immediately correct the situation.
- Ø Notify immediate supervisor and the CMHP Superintendent.
- Ø Recommend disciplinary action to Supervisor, in compliance with the following guidelines;
 - 1st Offense – (3) three days suspension without pay. Return to project conditional upon Fall Protection training.
 - 2nd Offense – Removal from CMHP projects.

Superintendent will:

- Ø Notify the subcontractor if the violation is by a subcontractor's employee.
- Ø If the violation is by a field employee, implement the above outlined disciplinary actions.
- Ø If the violation is by a confidential employee, notify the Executive Vice President of Operations and the Regional Executive Officer. Executive Vice President of Operations and the Regional Executive Officer will then implement disciplinary action.

All disciplinary actions must be reported to the Corporate Safety Department for tracking purposes.

Attachment 2

Wire Rope Rail Safety Requirements

1. As a minimum, 3/8" diameter cable will be used.
2. Top Rail (cable) will be installed 42" above the top of the finished slab elevation. The intermediate rail will be installed at the mid-point between the top of the finished slab and railing. High visibility material such as construction tape will be installed on the top rail at six-foot intervals.
3. Cables are to be installed so that cable tension and cable supports (columns and intermediate posts) prevent cables from deflecting in excess of 2" when a 200 lbs. downward force is applied. Intermediate posts (approximately 8' on center) will be required.
4. Cables must be secured at the interior side of each structural column with nuts (no washers).
5. Eye splices must be utilized for cable splicing with a minimum of three wire rope "J" type clips. No bypass or Molly Hogan splices are permitted.
6. Cables must be terminated with eye splices around each end support; no dead end terminations are permitted.
7. 18" turnbuckles are to be installed every third bay or 100', whichever is less.
8. A minimum of three "Crosby" clamps shall be used at each tie back.
9. Guardrail systems approved by a registered engineer will be accepted as long as they meet OSHA and CMHP requirements.

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Attachment 3

Fall Protection Training Record

_____ Employee Name	_____ Date
_____ Social Security Number	_____ Badge Number

INITIAL TRAINING

- t A copy of the Company Fall Protection Program is given to the employee.
- t The program is explained either orally or through a video presentation.
- t The equipment in use on this project at this time is demonstrated.

Brands and equipment covered:

- _____

- t The employee has been instructed in how to perform the daily inspection.
 - t The employee has also been instructed that if he/she suspects that anything is wrong or amiss with the equipment or system that they are asked to use, they immediately report to their supervisor and do not use that component until deemed safe to do so, replaced or repaired.
 - t If the employee ever has any questions or concerns about their safety to report the concerns to their supervisor, the project Safety Manager or to management.

_____ Signature of Trainer	_____ Date
_____ Signature of Employee	_____ Date

This document is to remain a part of the employee's permanent personnel file.

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Attachment 4

Fall Protection Training Update

_____ Employee Name	_____ Date
_____ Social Security Number	_____ Badge Number
_____ Signature of Trainer	_____ Date
_____ Signature of Employee	_____ Date

Subject of Material Covered:

This document is to remain a part of the employee's permanent personnel file.

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Attachment 5
Standard Form for release of Floor or Stairs

_____ will install and maintain all safety protective devices as necessary to protect its employees from hazards associated with steel erection. The AISC code of standard practice guidelines (7.2) will be followed as well as OSHA Standards including Subpart "R" and Subpart "M" as they relate to steel erection.

_____ will provide a means of safe access for its employees. These devices shall be used by _____ employees only, and their use by any other contractor, subcontractor or their employees is prohibited.

As stated in CFR 1926.16(C) "the subcontractor only assumes responsibility for that portion of his own work in regards to safety. The prime contractor who assumes the entire responsibility for work being done, must instruct each subcontractor to provide equipment and training for the safety of their employees."

Safety devices including guardrails, covers, and horizontal lifelines that are installed for the protection of those involved in steel erection may or may not meet the standards required for use by employees of other subcontractors. _____ will not assume responsibility for any claims arising from the use of those devices by other contractors or their employees. Under current OSHA standards, guardrails may not be used for personal fall arrest unless they have been designed, rated, and tested for use as horizontal lifeline. (1926.502(d)(23) in part)

No employee shall enter or work in any area including stairways that has not be released by _____ in writing. Prior to release of any floor stairway by _____, the prime contractor must inspect all safety devices in the area and agree to accept responsibility for the condition, maintenance and proper use of such devices by signing this form. Clark/McCarthy Healthcare Partners, A Joint Venture, and _____ will not be held responsible for latent defects.

_____ may install additional safety devices upon request by the prime contractor only after the installer has been indemnified from liability for any injuries or accidents incurred through the use of the devices in writing. An additional cost shall be agreed upon prior to installation of safety devices including, but no limited to, guardrails, lifelines, temporary covers, ladders, scaffolds, temporary work platforms, or any anchorages designated as permissible for use as part of an overall personal fall arrest system. _____ will not accept responsibility for maintenance after installation nor will it accept any other liability for the safety equipment installed once the prime contractor has accepted the floor or area.

The area or stairway, described below has been released by _____ for use by the prime contractor. This area has been accepted according to the terms and conditions described above.

Level _____ bounded by gridlines _____ & _____

General Contractor _____

By _____ Title _____

Steel Erector _____

By _____ Title _____

Date _____ Project Name _____

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Attachment 6

Fall Protection Plans in Exception Cases

If it is determined that the work falls into an exception category then a written fall protection plan must be developed and submitted to the CMHP Regional Director of Safety for approval, prior to performing any work. The plan must include the following:

1. A qualified person must write it and only a qualified person may make changes to it, which must also be in writing.
2. It must be developed specifically for the project/area of work where the work will be performed.
3. A copy of the plan must be maintained at the project.
4. It must be implemented under the supervision of a competent person.
5. It must document why the use of conventional fall protection methods are either infeasible or create a greater hazard.
6. It must include a written discussion of other measures that will be taken to reduce or eliminate the fall hazard(s).
7. The plan must identify each location where conventional fall protection methods cannot be used. These locations must then be classified as Controlled Access Zones.
8. The plan must include the name or other method of identification for each employee who is designated to work in a Controlled Access Zone. No other employees may enter a Controlled Access Zone.

Controlled Access Zones may only be used when a Fall Protection Plan has been developed, submitted and approved as described above. They must meet the following criteria:

1. A control line must define them or some other method that restricts access.
2. The lines must be erected not less than 6 feet or more than 25 feet from the unprotected edge except when erecting pre-cast concrete members.
3. When erecting pre-cast concrete members, the control line must be not less than 6 feet nor more than 60 feet or half the length of the member being erected, whichever is less, from the leading edge.
4. The control line must extend along the entire length of the unprotected edge and approximately parallel to it.
5. The control line must be connected on each side to a guardrail system or wall.

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6. For bricklaying, the line must be not less than 10 feet or more than 15 feet from the working edge.
7. Additional control lines must be placed at each end to enclose the Controlled Access Zone.
8. Control lines should consist of rope, wire, or comparable material. Each line must be flagged or clearly marked with high visibility material at not more than 6-foot intervals.
9. Each line must be rigged and supported in such a way that the lowest point, including sag, is not less than 39 inches and the highest point is not more than 45 inches above the walking/working surface.
10. Each line must have a minimum breaking strength of 200 pounds.

A Safety Monitor will be required as part of the Fall protection Plan. These may only be used for work on low-sloped roofs in conjunction with a warning line system, pre-cast concrete erection work, or residential construction when it can be demonstrated that it is infeasible or it creates a greater hazard to use conventional fall protection equipment. If any of these situations exists, the safety monitoring system must meet the requirements of 1926.502(h).

1. A safety monitor must be designated to monitor the safety of employees working in a Controlled Access Zone. The safety monitor must meet the following requirements:
 - The monitor must be competent to recognize fall hazards.
 - The monitor must warn an employee when it appears that the employee is unaware of a fall hazard or is acting in an unsafe manner.
 - The monitor must be on the same walking/working surface in visual sight of each employee and close enough to communicate effectively with him or her.
 - The monitor must not have other responsibilities that could take that person's attention away from the monitoring function.
 - Each employee working in a Controlled Access Zone must be directed to comply promptly with fall hazard warnings from safety monitors.
 - Each employee working in the Controlled Access Zone will be limited to a fall exposure of no more than 15 feet.
 - The monitor will wear an orange vest or other highly visible apparel that easily sets them apart from the crew performing the work in the Controlled Access Zone.

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Attachment 7



Clark/McCarthy Healthcare Partners, A Joint Venture
in association with



EMERGENCY PHONE NUMBERS**

CMHP FIELD OFFICE911 OR _____
FIRE / AMBULANCE911 OR _____
POLICE / SECURITY911 OR _____

EMERGENCY PROCEDURE:

1. Radio or call the CMHP Field Office and/or call emergency services.
2. Clearly indicate that you are calling from a construction site.
3. Give a detailed description of the incident and extent of damage or injury.
4. Specify the incident location by area and/or building and indicate the best gate for access by number.
5. Maintain communication for questions or instructions.
6. Direct TWO people to meet the emergency vehicles at the indicated gate and escort each vehicle to the scene of the incident.
7. Call the Corporate Safety Department at 301-272-8319 or 301-325-3991 and notify staff of all incidents.
8. If an evacuation of the site is necessary, notification will be given by radio, word of mouth and/or a continuous horn blast.

* * Post next to all office and job site phones.

Subject: Emergency Action Plans

1. PURPOSE

To establish the minimum requirements for Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP) and its subcontractors for the effective emergency action in the event of a crisis in a region or on a specific project. The following outlines general guidelines for regions and/or projects to develop a specific project emergency action plan in preparation for an incident(s)

2. SCOPE

This procedure applies in its entirety to all CMHP projects unless a variance from its requirements is granted by the Corporate Director of Safety and Health.

3. DEFINITIONS

- (a) Crisis – any incident that can focus negative attention on the company and have adverse affects on the overall financial condition, relationships with our audiences, and/or reputation within the marketplace.
- (b) Emergency Action Plan – written guidelines designed to maintain the company's credibility and positive image with all identified audiences in the face of adversity.

4. RESPONSIBILITIES

- (a) The Project Superintendent has overall responsibility for ensuring there has been a written site specific emergency action plan put in place prior to each project starting.
- (b) The Project Safety Manager is responsible to assist the Project Superintendent in developing and enacting the site specific emergency action plan.
- (c) It is the responsibility of all managers and supervisory personnel to enforce this procedure and of each employee to follow it.

5. GENERAL REQUIREMENTS

- (a) Develop a Site Specific First Hour Response Checklist and assign specific responsibilities (See Attachment 1).
- (b) Develop a Site Specific Contact list with specific contact information. Titles should be accompanied by specific names (See Attachment 2).
- (c) Develop a site specific emergency action plan with evacuation procedures.
- (d) Review all lists with project personnel and subcontractor management and post.

Subject: Emergency Action Plans

6. IMPLEMENTATION

EACH PLAN SHOULD INCLUDE THE FOLLOWING:

(a) Steps to take after a serious incident:

1. Determine the extent and nature of the incident and call 911.
2. Secure the scene and project.
3. Protect and administer first aid to the injured.
4. Account for all jobsite personnel.
5. Follow the Incident Investigation procedures outlined in policy A-5.
6. If there are injured parties, send a company employee with any injured to call the Superintendent once a destination has been determined and to meet the family once they arrive at the facility.
7. The REO and Project Executive will then determine the most appropriate person to call the spouse/family. That company representative should call the spouse/family and explain that there has been an incident and that the employee has been injured, but should not discuss the severity of the injuries. If asked about the severity of the injuries, the response should be: "We can't be certain of the extent of the injuries until we hear from a doctor."
8. If necessary, send a company representative to the injured's home to lend assistance. This may include finding someone to watch the children or other members of the family.
9. Assure an employee conduit between the family and the company is assigned by the Risk Management Department. The company must make certain that the family's needs are being met.

(b) Steps to take after a fatality:

1. Follow the aforementioned steps for a serious incident.
2. A member of the company's upper-management team makes a "best effort" to inform the spouse/family in person of the incident. If it is not possible to make a face-to-face notification, a member of clergy or a police officer may be possible candidates to make this notification. The goal is to notify the spouse/family quickly...a phone call is a last resort because of its impersonal nature.

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NOTE: Upper management may decide to treat the notification in the same manner as an injury situation (as described on the previous page) in order to get the spouse/family to the medical facility as quickly as possible. Once the spouse/family arrives at the medical facility, the attending physician can deliver the news. A member of the company's upper-management team should be in attendance to provide support.

2. The designated company representative remains at the employee's home until other family members arrive or for as long as he or she can.
3. The media may attempt to contact a family member. You cannot prevent them from talking to the media. It is their right to speak to the media if they wish.
4. Determine whether the employee's family is in need of money to cover small expenses and inform the Human Resources Department. The few dollars spent will come back in goodwill.
5. Maintain contact with a relative or close friend of the spouse or family to ensure that funeral arrangements and related items are being handled. The family may wish to visit the incident site prior to, or immediately following, the funeral. The company should make arrangements for this visit to occur.

NOTE: If the fatality involves a non-employee, the authorities should be consulted about notification procedures and if possible, a CMHP representative shall participate.

Refer also to Section 5 of this manual "Incident Investigation and Reporting"

(c) Steps to take after a bomb threat:

1. Keep the caller on the line for as long as possible. If possible, ask the following questions:

When will the bomb go off?
Where is the bomb located?
What type of bomb is it?
How is the bomb activated?
Why are you doing this?

2. Take note of the following:

Time of call?
Exact words of caller?
Male or female?
Accent?
Familiar voice?

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Background noises?

Did the caller seem to be familiar with the building or location?

3. Notify the Superintendent and Safety Manager who will determine whether or not to evacuate the premises. If evacuation is called for, have employees meet in a pre-assigned assembly area outside of the building.
4. Call 911.
5. Do not allow anyone except authorized personnel to enter the job site. All visitors should be escorted from the job site, but remain available for questioning.
6. The team leader should determine if media attention is likely. If so, the corporate spokesperson should be dispatched to assist in this area.
7. Notify the project owner/developer.
8. Review Attachment 4, "Search Procedures for a Bomb Threat"

(d) Evacuation Procedure Criteria

1. Written Escape routes (Exit locations and paths)
2. Duties for coordinators of an evacuation
3. Designated employee/subcontractor meeting spots
4. Designated staff members to take head counts and report to the Superintendent.
5. Communication procedures.

(e) Other Preparations

1. Each project is unique and will require specific emergency preparations to be included in this plan.
2. Examples of specifics that may need to be included for specific projects:
 - § Military/owner specific requirements
 - § Medical facility locations
 - § Specific hazard responses for chemical exposure
 - § Unique operation shut down
 - § Unique location issues

Subject: Emergency Action Plans

7. ATTACHMENTS

- (a) First Hour Response Checklist. (Attachment 1) (To be used in conjunction with section A-5 of this manual)
- (b) Emergency Contact List. (Attachment 2)
- (c) Fatality Notification. (Attachment 3)
- (d) Bomb Threat Search Procedures. (Attachment 4)

Subject: Emergency Action Plans



Attachment 1
First Hour Response Checklist
(To be used in Conjunction with Section A-5)

Superintendent

- ___ Call 9-1-1.
- ___ Contact the safety manager.
- ___ Initiate site control and make certain that all employees are accounted for.
- ___ If the site will be shut down, tell workers when they are to report back to work and that counseling will be available (if applicable). Also, direct information requests from outside group to you. Keep select individuals on-site to help with the incident.
- ___ Do not move anything that could be classified as evidence.
- ___ Ensure telephone coverage at the site.
- ___ Post workers to restrict entry to the site.
- ___ Establish a command center, generally the CMHP office.
- ___ Notify the owner/developer of the project.
- ___ Select a temporary spokesperson to issue a buy-time statement if the media arrives (see below) until the REO selects a company spokesperson.

Required Buy-Time Statement (per HR Policy 1.3):

"My name is (___) and I am (title) with Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP). The incident has just happened and is under investigation, and as soon as we have reliable information, we will make it available. Meanwhile, we are doing everything we can to assist rescue personnel and investigating personnel. Thank you and I will be back by (time)."

The Superintendent or Project Manager also may respond to common sense questions such as: Who is the developer and/or owner? Who is the architect? (Often this information is posted on signs at the construction site anyway).

An Owner or Owner's Representative may wish to make a statement in lieu of CMHP staff. This is permitted and encouraged.

Project Manager

- ___ Determine what happened, when/where it happened, and who is involved.
- ___ Notify corporate management (**insert name(s)/number(s)**).
- ___ Verify the current status of the site (shut down?).
- ___ Determine whether you and/or spokesperson are needed on site and let the REO know.
- ___ Advise the corporate team administrator and receptionist how to route calls.

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- ___ Identify potential spin-off crises.
- ___ Notify human resources **(insert name/number)**.
- ___ Notify the Corporate Safety Department and Risk Management **(1-301-325-3991)**.

Safety Manager

- ___ Follow the incident investigation guidelines in section A-5.
- ___ Document the entire incident scene.
- ___ Fill out the initial investigation report and submit it.
- ___ Communicate to regional and national managers.

Regional Executive Officer

- ___ Maintain close contact with the Superintendent and Project Manager to determine level of involvement.
- ___ Review/approve all statement/communications to the news media.
- ___ Work closely with legal counsel.
- ___ In the event of an injury/fatality, be prepared to designate a person to make the call/visit to the family.
- ___ In the event of a highly visible crisis, be prepared to make the initial statement to the news media...with no Q&A.
- ___ Oversee communications with employee base and other outside stakeholders.

Designated Spokesperson

- ___ Write, and get clearance for, all statements and releases from the REO.
- ___ Designate someone to screen your calls from the news media.
- ___ Complete the media log sheets.
- ___ Anticipate media questions. If possible, role play a media interview with a colleague before going live.
- ___ Assemble necessary background information and literature.
- ___ Advise reporters of a time and place for future updates.
- ___ Follow-up on additional media inquiries.

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Attachment 2
Emergency Contact List

Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP) Numbers

Superintendent	Day: Night: Cell:
Safety Manager	Day: Night: Cell:
Project Manager	Day: Night: Cell:
Project Executive	Day: Night: Cell:
Assistant Superintendent	Day: Night: Cell:
Regional Executive Officer	Day: Night: Cell:
Corporate Safety Department:	24 hour hotline 1-301-325-3991
Risk Management Department:	
Legal Department:	
Insurance Carrier:	

EMERGENCY SERVICES

EMS:

Hospital;

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Ambulance:

Police:

Fire Department:

UTILITY COMPANIES

Power Company:

Gas Company:

Phone Company:

Water Company:

Traffic Signal Repair:

GOVERNMENTAL AGENCIES/OFFICES *(List only those applicable)*

OSHA:

(Note: only the Safety Department can notify OSHA)

MSHA:

(Note: only the Safety Department can notify MSHA)

EPA:

HazMat:

Coast Guard:

Note: Add other specific numbers relevant to your project

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Subject: Emergency Action Plans



Attachment 3 **Fatality Notification**

In the event of an employee or subcontractor fatality, you may be called upon to notify the spouse or family member by the Human Resources Department. This is a traumatic event for both the relative and you. Here are some guidelines to help with this process.

Do your homework. Obtain the full name, address, and social security number of the deceased. Next, get the full name of the next of kin, the relationship (wife, brother, mother, etc.) and determine if the family members are English speaking. Find out if the family member has any health problems that could be exacerbated upon notification. If so, bring a health-care professional along with you. Gather all information relative to the case so you can provide an explanation.

Determine where you will meet. Will the contact be at home, work, or school? If it is outside of the home, arrange with the relative's employer or school for a private place to meet. Verify that you are talking to the correct person, i.e. "Are you Sandy Johnson's sister?"

Do not go alone. Take a fellow employee, friend of the deceased, member of the clergy, or police or fire official to support you.

Decide in advance what you will say. There is no easy way to say that someone has died, so do not even try to make it easier. Speak simply and directly. Using terms like "mortally wounded" only confuses people. While it is not necessary to be blunt or cold, at some point it is necessary to say "dead" or "died." Example: "Mrs. Jones, there was a very bad accident this morning at the project. Charlie was moving a ladder and fell over a guardrail. The paramedics did everything they could, but he died instantly."

Do not lie. If you tell a mother that her son died with her name on his lips but she later learns his death was immediate, there is a conflict. It may not be necessary to offer all of the details. Example: If the spouse asks, "Did he suffer much?" an appropriate answer might be, "I don't think so."

Be prepared for emotions. There will be shock, denial, grief, numbness, and anger. These emotional reactions will be directed at the deceased, at you, and at the medical staff. Let the relative vent these feelings. Use common sense and do what seems appropriate at this time. Some people will appreciate a touch of a hand; others will not.

Decide what not to say. By not preparing what to say, you may end up saying things that you will later regret. Example: In an effort to offer words of comfort, do not say, "He's with God now," or "You're young and will find someone else." Instead, say, "I'm so sorry this has happened to you" or "What can I do to help you right now?"

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Always listen. The formula is 90% listening and 10% talking. If the relative needs to go to the hospital or funeral home, you may offer to drive or get a cab. If there are children involved, help arrange for a sitter or have a friend to look after them. When appropriate, offer assistance in getting in touch with the life insurance company, social security, and so forth.

When it is over. You have gone through an extremely stressful event. Take care of yourself now. Use your critical-incident stress counselor to review the difficult process you went through. No one ever gets comfortable with this part of the job.



Attachment 4

Search Procedures for a Bomb Threat

1. Search public access areas first. Do not turn on the lights, throw any switches, or use the telephone in a search area because a bomb could be attached. Turn off radio transmitters in the area because some bombs can be triggered by radio waves. An ample number of flashlights should be available to aid with the search.
2. The police, fire department, or other officials normally will not help in the initial search for a bomb on private property. The Superintendent on site will determine which personnel will be asked to initiate a search.
3. Visually search a room in sections starting at floor level and going around the room in one direction. Then search at waist level around the room again, and finally, search the upper walls and ceiling areas around the room. Listen for any unusual noises.
4. If an object is found, have all personnel evacuate the area. If an evacuation is ordered, employees should follow the site evacuation procedures and stay a minimum of 300 feet from the building.
5. **Immediately** notify the authorities giving the location, size, and shape of the object. Do not touch or move the item. Never place anything directly on the item and do not immerse it in water.

Subject: Incident Investigation and Reporting

1. PURPOSE

To establish the minimum requirements for Clark/McCarthy Healthcare Partners, A Joint Venture (CMHP) and its subcontractors for the effective investigation of all incidents.

NOTE: It is the policy of the Company to investigate **ALL** incidents that result in a CMHP or Subcontractor employee seeking medical treatment, injury or incident involving the public or property damage. It is further the policy of this Company to investigate all “near miss” or “close call” incidents that could have had serious outcomes. Our desire is to find out what happened, why it happened, and most importantly, how we can prevent a similar incident from occurring in the future. The objective is not to assign blame, but to learn. This process is designed to get all parties involved when an incident occurs and to raise the importance of any incident.

2. SCOPE

This procedure applies in its entirety to all CMHP projects unless a variance from its requirements is granted by the Corporate Director of Safety and Health.

3. DEFINITIONS

Not applicable.

4. RESPONSIBILITIES

- (a) The Project Superintendent has overall responsibility for ensuring there has been a thorough investigation of the incident, and to take photo's, statements, save evidence etc. and ensuring compliance with this procedure. The Superintendent is responsible to immediately contact the Safety Manager and Claims Manager.
- (b) The Project Safety Manager is responsible initially determining the seriousness of the incident and informing the corporate safety department and regional safety director. The Safety Manager is also responsible with assisting the Project Superintendent with the investigation and to take the lead if warranted.
- (c) It is the responsibility of all managers and supervisory personnel to enforce this procedure and of each employee to follow it.

5. GENERAL REQUIREMENTS

- (a) The following circumstances require an investigation:
 - 1. Any Fatality.
 - 2. Serious Injuries (head injury, loss of consciousness, loss of limb, injury requiring an ambulance at the scene).
 - 3. Any injury to a CMHP or subcontractor employee who goes to a doctor for care of a job related injury.

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4. Injury due to fall from an elevation of 6 feet or more.
 5. Injury to more than one party in a single incident.
 6. Collapse of a structure.
 7. Any incident involving significant property damage.
 8. Any injury or property damage involving the public.
 9. Any incident of questionable merit.
 10. In the even you're not sure whether to report something, report it.
- (b) Subcontractors. Subcontractors shall establish the same procedures and submit any reports generated to the CMHP Superintendent who monitors their work.
- (c) Incident Investigation Form. The form to be used can be found at the end of this section. (Attachment 1)

6. IMPLEMENTATION

- (a) Notification to Corporate Safety Department. All circumstances noted above are to be a basis for notifying the CMHP Corporate Safety Department thru the 24/7 hotline, 1-301-325-3991 regarding any possible liability incidents. Any incidents that may happen that fall under any of these categories must be reported immediately without exception. This includes any incident that happens over the weekends or evenings. Call the hotline number and let the responder know the situation.
- (b) All Incident Investigations must be submitted in 48 hours. Reports must be thoroughly completed and submitted with the required signatures within 48 hours with attached notes, witness statements, pictures, sketches, drawings with measurements and other pertinent evidence. Indicate if there is any physical evidence that has been saved such as a ladder, electrical cord, etc. Identify who, what, where, when, why and by whom. The report can be preliminary in nature (when there is an ongoing investigation). The report must be distributed to:
1. Regional Executive Officer
 2. Project Executive
 3. Regional Safety Director
 4. Corporate Safety Director
 5. Project Safety Manager
 6. Project Manager
- (c) Photos must be taken of the incident scene. Photos of the incident scene must capture details you may not notice during your observations. On the back of the photo note: the name of the individual who took the photos, as well as any other comments or description.
- (d) Follow Up Actions. The following must be completed within the allocated time.
1. For an Incident involving a first aid and/or a reported near miss:

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- a. Superintendent is responsible to complete notifications, fill out and submit the incident form within 24 hours as detailed above.
 - b. Safety Manager and Superintendent will hold a meeting with the applicable party(s) to discuss what took place within 24 hours based on the seriousness of the incident. The meeting shall be documented.
 - c. Safety Manager in conjunction with the Superintendent will hold a special toolbox talk meeting and/or “take-five” with the project staff and field personnel to discuss the incident and prevention measures for the future within 48 hours. The meeting shall be documented with a copy immediately submitted to the Corporate Safety Department.
 - d. Safety Manager shall assist in completing a “CMHP Red Alert” with the corporate safety department for proper distribution, as deemed necessary by the Company Safety Director.
2. For an incident involving a recordable or lost time injury, and/or property or public damage:
 - a. Superintendent is responsible to complete notifications, fill out and submit the incident form within 24 hours as detailed above.
 - b. Safety Manager in conjunction with the Superintendent will hold a special toolbox talk meeting with the project staff and field personnel to discuss the incident and prevention measures for the future within 48 hours. The meeting shall be documented with a copy immediately submitted to the Corporate Safety Department.
 - c. Regional Safety Director and/or Safety Manager, Project Executive, Superintendent, and all other applicable parties shall hold a meeting at the jobsite within 48 hours to discuss the incident and preventative measures for the future. The meeting shall be documented and submitted to the corporate safety department. The Corporate Safety Department shall distribute the documentation to upper management for review. In those areas where geographical limitations involving travel exist, parties which cannot attend the meeting shall attend via conference call.
 - d. Regional Safety Director shall complete a “CMHP Red Alert” and submit it to the Corporate Safety Department for proper distribution for all lost time injuries, as deemed necessary by the Company Safety Director.
3. For an incident involving multiple recordable or lost time injuries, a fatality, and/or major property or public damage:
 - a. Superintendent is responsible to complete notifications, fill out and submit the incident form within 24 hours as detailed above.
 - b. Regional Executive Officer, Senior Vice President of Legal Affairs, Company Safety Director, Regional Safety Director, Safety Manager, Project Executive, Superintendent, Claims Manager, and all other applicable parties shall hold a meeting at the jobsite within 24 hours to discuss the incident and preventative measures for the future. The meeting shall be documented and submitted to the Corporate Safety Department. The Corporate Safety Department shall distribute the documentation to upper management for review as appropriate. In

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- those areas where geographical limitations involving travel exist, parties who cannot attend the meeting shall attend via conference call.
- c. No comments to the media except by authorized CMHP individuals are to be made. Refer to the Company policy on handling the media.
 - d. Regional Safety Director shall complete a "CMHP Red Alert" and submit it to the Corporate Safety Department for proper distribution.
 - e. Safety Manager in conjunction with the Superintendent will hold a special safety meeting with the project staff and field personnel to discuss the incident and prevention measures for the future. The meeting shall be held and documented only after a major investigation has been completed. A preliminary meeting may be held to quell any concerns of the staff but with limited information being distributed.
 - f. Company Safety Director shall review the incident with all Regional Executive Officers at the next available meeting.

7. EXHIBITS/ATTACHMENTS

- (a) Incident Investigation Report. (Attachment 1).

Attachment 1



Incident Investigation Report Form (To be completed by the Supervisor within 24 hours of the incident.)

General Information

Date: _____ Job Number & Name: _____

Date of Incident: _____ Time: _____ AM/PM Shift: _____

Jobsite/Area: _____

Insurance Program: _____ CCIP _____ CORP _____ OCIP _____ Other: (explain) _____

Weather Condition: _____ Jurisdiction of Job Site: _____

Date Incident Reported and To Whom: _____

Injured Party Information

Employee/Subcontractor Name: _____

Male _____ Female _____ Date of Birth _____ Ht. _____ Wt. _____

Address: _____

Home Phone: (_____) _____ Identification No.: _____

Job Title: _____ Employee No.: _____

Employer Name: _____ Date of Hire: _____

Employer Phone Number: (_____) _____ Foreman Name and No.: _____

Employer Address: _____

Incident Description

How did the incident occur? Describe in detail the task the individual was doing when injured or became ill. Include Specifics such as equipment, structure tools, materials, objects (size, shape, weight), people involved in the task, positions, distances, rate of movement, sequence of events, etc. [PLEASE STATE FACTS ONLY]

Attach a diagram of the incident or site layout to better describe the incident.

Attachment 1

Witness Information

Name: _____ Company: _____ Phone: _____

Name: _____ Company: _____ Phone: _____

Name: _____ Company: _____ Phone: _____

Incident Information

Describe the nature and extent of injury/illness (body part affected, type of injury, etc.): _____

Was First Aid administered? _____ Yes _____ No

Was the individual taken to the hospital/clinic? _____ Yes _____ No

Medical Clinic and Doctor	Hospital
Address	Address
Phone Number	Phone Number
Date First Sought Treatment	Release to RTW Date

Corrective Action(s) Taken or Planned

What was/will be done?

By Whom

Estimated Completion Date(s)

Fax a copy of this incident report to:

(301) 272-8478

Date: _____

Prepared By: _____

Title: _____

Safety Manager: _____

Lead Superintendent: _____