DHHS POLICIES AND PROCEDURES

Section V:	Human Resources
Title:	Energized Electrical System Work Safety (70E)
Current Effective Date:	3/1/18
Revision History:	
Original Effective Date:	3/1/18

Purpose:

The purpose of this policy is to provide guidelines for the implementation of an Electrical Work Program for the Department of Health and Human Services. This program has been implemented to prevent injury or death in the event of an arc flash/blast incident. This program aims to ensure employees who are working with or near electrical circuits do so in a safe and controlled environment and to ensure the safety of others who may be in the area including patients, residents, clients, contractors, or visitors.

Policy:

It is the policy of the Department of Health and Human Services (DHHS) to provide a safe workplace for employees, patients, residents, clients, visitors, and any other individuals present in DHHS facilities/divisions. To preserve life and reduce injury in the event of an arc flash/arc blast incident in a DHHS facility or division, the following guidelines have been established to maximize survivability.

To comply with the NC Department of Labor, Occupational Safety and Health Administration Standards (OSHA), Subpart S, this written program has been established for North Carolina Department of Health and Human Services (hereafter referred to as DHHS).

This program establishes minimum standards to prevent hazardous electrical exposures to personnel and ensure compliance with regulatory requirements applicable to electrical systems. Working on equipment in a de-energized state is **mandated** unless deenergizing introduces an increased hazard or is infeasible. This program is designed to help ensure that energized electrical work is performed safely by qualified electrical workers, who are trained and provided with the appropriate safe work procedures, protective equipment, and other controls. The program is intended to protect employees against electrical shock, burns and other potential electrical safety hazards as well as comply with regulatory requirements.

All construction projects contracted by DHHS facilities/divisions are included in this program and are required to comply with this program. Copies of this written program, shall be made available for review, upon request, by any contractor or DHHS employee.

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Scope:

This policy is applicable to all divisions, facilities, and offices within the Department of Health and Human Services, performing work on 50 Volts AC or DC or greater. This plan shall be used by all DHHS facilities/divisions unless a site-specific plan has been developed. At a minimum, plans shall meet the requirements of this policy.

Definitions

Authorized Lockout/Tagout Employee – Refer to the DHHS Lockout/Tagout plan or the written Lockout/Tagout Program at your location.

Balaclava – a piece of protective apparel that is made of flame resistant fabric. It is worn over the head to protect the neck, face and head during an arc flash event. It is worn under the hardhat and face-shield.

Confined space - An enclosed space which has limited egress and access, and has an atmospheric hazard (e.g., explosive atmosphere or asphyxiating hazard) and/or other serious safety hazards (e.g., electrical hazard).

Damp location - Partially protected locations subject to moderate degrees of moisture, such as some basements.

De-energized electrical work - Electrical work that is performed on equipment that has been previously energized and is now free from any electrical connection to a source of potential difference and from electrical charges.

Disconnecting (or isolating) switch - A device designed to close and/or open an electric circuit.

Dry location - Locations not normally subject to dampness or wetness, as in the case of a building under construction.

Energized electrical work - Repair, maintenance, troubleshooting, or testing on electrical circuits, components, or systems while energized (i.e., live). Only Qualified Electrical Workers are permitted to work on energized circuitry of 50 volts/25 amps to ground or greater.

Energy source - Any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy.

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Exposed electrical parts - Energized parts that can be inadvertently touched or approached nearer than a safe distance by a person. Parts not suitably guarded, isolated, or insulated. Examples include terminal contacts or lugs, and bare wiring.

Ground Fault Circuit Interrupt (GFCI) - A device whose function is to interrupt the electric circuit to the load when a fault current to ground exceeds a predetermined value that is less than that required to operate the over-current protective device of the supply circuit.

Ground - A conducting connection, whether intentional or accidental, between an electrical circuit or equipment and the earth or to some conducting body that serves in place of the earth.

Hazardous Location - An area in which an airborne flammable dust, vapor or gas may be present and would represent a hazard if a source of ignition were present (see National Fire Protection Association (NFPA) Class I & II and Division 1 & 2).

Interlock - An electrical, mechanical, or key-locked device intended to prevent an undesired sequence of operations.

Isolating Switch - A switch intended for isolating an electric circuit from the source of power. It has no interrupting rating, and is intended to operate only after the circuit has been opened by some other means.

Life Safety Equipment - Equipment that provides critical protection for safety in the event of an emergency or other serious hazard. Life safety equipment, which is electrically energized, should be worked on using Energized Electrical Equipment (EEW) procedures to ensure that the protection provided by the equipment is not lost (e.g., fire alarm and evacuation).

Lockout / Tagout – See written Lockout Tagout Program.

Qualified Electrical Worker – A qualified person trained and knowledgeable of construction and operation of equipment or a specific work method and is trained to recognize and avoid the electrical hazards that might be present with respect to that equipment or work method.

• Qualified electrical workers shall be familiar with the proper use of the special precautionary techniques, personal protective equipment (PPE), including arc-flash, insulating and shielding materials, and insulated tools and test equipment. A person can be considered qualified with respect to certain equipment and methods but is unqualified for others.

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• An employee who is undergoing on-the-job training and who, during such training, has performed duties safely at his or her level of training and who is under the direct supervision of a qualified person shall be qualified.

Only a Qualified Electrical Worker can work on energized circuits.
Note One: Whether a person is considered to be a "qualified" person will depend upon various circumstances in the workplace. It is possible and, in fact, likely for an individual to be considered "qualified" with regard to certain equipment in the workplace, but "unqualified" as to other equipment.
Note Two: An employee who is undergoing on-the-job training and

Note Two: An employee who is undergoing on-the-job training and who, during such training, has demonstrated an ability to perform duties safely at his or her level of training and who is under the direct supervision of a qualified person is considered to be a qualified person for the performance of those duties.

Remote-control Circuit - Any electric circuit that controls any other circuit through a relay or an equivalent device.

Safety Representative - The individual at each location, appointed by the site manager, who will oversee the safety program for the site.

Service - The conductors and equipment for delivering energy from the electrical supply system to the wiring system of the premises served.

Service Equipment - The necessary equipment, usually consisting of a circuit breaker or switch and fuses, and their accessories, located near the entrance of supply conductors to the building and intended to constitute the main control and means of cutoff of the supply.

Setting Up - Any work performed to prepare a machine or equipment to perform its normal production operation.

Site Manager - The supervisor who has the <u>overall</u> responsibility at a specific worksite.

Switching Devices - Devices designed to close and/or open one or more electric circuits. Included in this category are circuit breakers, cutouts, disconnecting (or isolating) switches, disconnecting means, interrupter switches, and oil (filled) cutouts.

Voltage (of a circuit) - The greatest root-mean-square (effective) difference of potential between any two conductors of the circuit concerned.

Voltage, nominal - An approximate value assigned to a circuit or system for conveniently designating its voltage class, e.g., 120/240, 480/277, and 600. **Wet location** - Installations subject to saturation with water or other liquids.

DEFINITIONS (for arc flash safety)

Arc blast - A pressure wave containing gaseous forms of metal created from an electrical current fault. The arc blast may be of sufficient intensity to knock a standing person down or off a ladder. The arc blast may also be of sufficient intensity to produce human injury.

Arc flash - The arc flash may be composed of radiant and convective energy, arc blast vapors, molten metal droplets, sound pressure, shock waves, intense light, and projectiles.

ATPV - Arc Thermal Performance Exposure Value. The minimum incident arc energy in calories per centimeter squared capable of causing the onset of a second-degree burn. ATPV is defined in American Society for Testing of Materials standard F1959/F 1959/M as a test method for flame retardant clothing.

Boundary, Flash Protection - The linear distance in all directions from an exposed energized electrical component that is just far enough away from the source to prevent permanent injury from an arc flash due to a fault current.

Boundary, Limited Shock - The linear distance in all directions from an exposed energized electrical part that defines the safe approach distance for unqualified persons.

Break-open threshold energy (EBT) - Maximum incident energy values that do not cause Flame Resistant (FR) material to break-open, and do not cause second degree burns on skin covered by the FR material.

Current limiting devices - Certain types of fuses or circuit breakers that, when interrupting current within its current-limiting range, will reduce the current in the faulted circuit to a substantially lower magnitude. Properly selected current limiting devices can limit the let-through energy to a level within the rating of downstream circuit components, even in the presence of high available system short-circuit current.

Electrically Safe Work Condition - De-energizing and securing energy sources to ensure employee safety. An electrically safe work condition is established by:

- Identifying all sources of the electrical supply
- Opening the disconnecting device for each supply
- Visually inspecting where possible, the disconnecting device to ensure that the switch has opened

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- Locking out all disconnecting devices to prevent unexpected reenergization
- Testing the circuit with an adequately rated test device (voltage tester or volt ohmmeter). The performance of the test instrument must be verified before and after each use
- Grounding the phase conductors or components if induced voltage or stored electrical energy is present.

Electrical Systems - Systems and associated equipment, which provides for the generation, transmission, conversion, distribution and use of electrical power.

Fault current - An electrical current that is following the path of least resistance, either from one phase to another, or to ground. This alternate path may be insufficient to contain the current, resulting in damage from extreme heat, fire, or flying components.

High Voltage - Voltage exceeding 600 Volts A.C. and D.C.

Incident energy - Energy from arc, both radiant and convective, that is received per unit area, in calories/cm2

Low Voltage - Voltage less than 600 Volts A.C. and D.C.

Qualified Engineer - A person with relevant education and experience to enable him or her to avoid dangers which electricity may create, and are licensed, authorized, and competent to carry out specific work on the electrical distribution system.

Senior Qualified Person - Appointed person who has direct management responsibility for the electrical power distribution system. Must be a Qualified Engineer.

Unqualified Person - Person adequately trained to enable him/her to avoid dangers which electricity may create but are not authorized to work on electrical systems.

Voltage Tester - A device capable of measuring the presence of voltage. These may be either solenoid operated or digital indicating. These units may also incorporate special features, such as the ability to indicate continuity. For the purposes of this procedure it does not include tick-tracers.

Volt-Ohm Meter (VOM) - A metering device capable of measuring continuity, voltage, and current. These units may also incorporate other special features, such as the ability to indicate capacitance and true Root Mean Square (RMS). These devices are also called multimeters.

Roles and Responsibility

DHHS Safety Programs Office is responsible for:

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- Consults with the division/facility Safety Officers and informs DSOHF management when issues in the facilities cannot be resolved at that level,
- Develops and interprets policy in areas of occupational health, fire protection and environmental regulations,
- Ensures the effectiveness and uniformity of safety programs in consultation with DSOHF,
- Monitors reports generated by facilities safety personnel, and
- Provides guidance and technical supervision to facilities safety personnel.

Plant Operations Director

- Evaluate work being performed and determine compliance with this program.
- Provide or assist in the task of specific training for electrical work qualifications.
- Maintain training recordkeeping.
- Periodically review and update this written program.
- Evaluate the overall effectiveness of the electrical safety program on a periodic basis.
- Ensure that all electrical and arc flash PPE is properly inspected and maintained.
- Promote electrical safety awareness to all employees.
- Ensure employees comply with ALL provisions of the electrical safety program.
- Ensure employees receive training appropriate to their assigned electrical tasks and maintain documentation of such training.
- Develop and maintain a listing of all qualified employees under their supervision.
- Ensure employees are provided with and use appropriate protective equipment.
- Notify the responsible party of potential hazards requiring assessments, or improvements to the program.

Safety Officer

- Provides guidance to the facility on electrical safety requirements.
- Assists in the monitoring of the effectiveness of the Energized Electrical Work Program.
- Participates in the inspection and program review process.
- Conducts accident investigations on incidents involving electricity.
- Provides assistance in the training of unqualified and qualified persons.

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Employees

- Follow the work practices described in this document, including the use of appropriate protective equipment and tools.
- Attend all training required relative to this program.
- Immediately report any concerns related to electrical safety to supervision.
- Properly maintain and inspect all personal protective equipment prior to each use.
- Properly maintain and inspect all electrical safety equipment (insulated hand tools, arc-rated face shields, etc.).
- Wear all required personal protective equipment there are no exceptions.
- Inspect the equipment in accordance with manufacturer's guidelines and instructions.
- Report hazardous conditions or other health and safety concerns immediately to their supervisors/foremen/project managers.

Risk Assessment

Each location, regardless of their size or function, shall have an electrical arc flash risk assessment conducted by a qualified engineer. The arc flash risk assessment shall be updated whenever significant changes are made to the processes or facility. The risk assessment will include proper identification and labeling of the PPE categories of all electrical enclosures.

For those instances with typical work on 480 VAC circuits and lower, NFPA 70E (2015) provides for conditional relief from some of the PPE requirements via the implementation of an Arc Flash PPE Categories Method, provided the system is within the parameters identified in NPFA 70E-15ed 130.7(15). Based on the results of this assessment, as performed by a qualified electrical worker, it can result in the avoidance and or elimination of various elements of the PPE requirements for specific tasks. Switchboards, disconnects, buss-plugs, panel boards, industrial control panels, motor control centers, and all other applicable electrical enclosures shall be labeled to indicate the presence of an arc flash and shock hazard. The labels are required to include, at a minimum, the following information:

- Nominal Voltage
- PPE Category
- Arc Flash Boundary (in inches or feet)
- Limited Approach Boundary
- Restricted Approach Boundary

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NGE	ĸ
I Shock Haz PPE Required	zard
Required PPE	
Hard Hat	C T-shirt
Gafety Glasses	C FR Shirt
Safety Goggles	C FR Pants
Face Shield	FR Coverall
C Flash Hood	Flash Sulte
Ear Protection	
	Leather Gloves
Cong Sleeve Shirt Cotton Underwear Voltage Rated Gloves	

Sample Equipment label

NFPA 70E-15ed provides four (4) PPE categories. PPE Category 1, 2, 3 and 4. PPE Category 0 has been officially eliminated from the standard and is no longer recognized by OSHA or the NFPA as a legitimate PPE Category.

NFPA 70E-15ed 130.4 shall be followed for the Limited and Restricted Approach Boundaries

Training

Requirements

Workers near energized, or potentially energized electrical circuitry of fifty (50) volts to ground or greater, shall be trained in energized electrical safe work practices and procedures and retrained as necessary.

Qualified Electrical Worker

Employees must receive training in avoiding the electrical hazards associated with working on or near exposed energized parts prior to performing energized electrical work. Such training will be provided when the employee is initially assigned to the job and refresher training will be provided annually or when conditions change.

The following items are to be included in the training of Qualified Electrical Workers:

- The Lockout/Tagout Program including safe work practices required to safely de-energize electrical equipment.
- Universal electrical safety procedures.
- Skills and techniques necessary to distinguish exposed live parts from other parts of electric equipment.
- Skills and techniques necessary to determine the nominal voltage of exposed live parts.

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- Selection and use of proper work practices, personal protective equipment, tools, insulating and shielding materials and equipment for working on or near energized parts.
- Recognition of electrical shock and electrical arc flash/blast hazard potentials, how to minimize the risk of arc flash incidents, and the proper care and maintenance of arc flash PPE.

DHHS will have employees trained in recognizing signs and symptoms of electric shock, heart fibrillation, electric burns, and proper first aid protocols for these conditions. They must have the following training:

- Basic Cardio Pulmonary Resuscitation (CPR/AED)
- Contacting emergency personnel and basic first aid

Staff other than the QEW may fulfill this requirement, provided someone trained and equipped is able to initiate CPR/first aid within four minutes of a medical emergency.

Documentation of Training and Experience

DHHS facilities/divisions shall document that required training has been provided. Training sign-in sheets will be part of this documentation. A Qualified Electrical Worker will be utilized for this training and training certificates will be required from instructor.

Safe Work Practices

The most important principle of electrical safety is to **assume that all electrical circuits are energized unless a qualified electrical worker ensures they are not.** Verification of de-energized circuit must follow DHHS Lock out/Tag out procedures. Proper PPE must be worn until the equipment is proven to be de-energized.

A job safety briefing must be conducted by a Qualified Electrical Worker prior to the start of any work on or near energized or "assumed to be energized" electrical equipment. Access-Limiting Equipment

• Barricades shall be used in conjunction with safety signs to prevent or limit access to work areas containing live parts. Conductive barricades shall not be used where they might cause an electrical hazard. These barricades are designed to prevent un-qualified and/or unprotected workers from entering the electrical hazard area.

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• If signs and barricades do not provide sufficient protection, an attendant will be assigned to warn and protect pedestrians. The primary duty of the attendant shall be to keep an unqualified person out of the work area where an electrical hazard exists. The attendant shall remain in the area as long as there is a potential exposure to electrical hazards.

Working Space Around Electric Equipment

• Sufficient access and working space shall be provided and maintained around all electric equipment to permit ready and safe operating and maintenance of such equipment. Enclosures that house electric apparatus and are controlled by lock and key shall be considered accessible to qualified persons.

Working Spaces

Nominal Voltage	Minimum Clear Distance		
to Ground	Condition 1	Condition 2	Condition 3
0-150	900mm (3 ft.)	900 mm (3 ft.)	900mm (3 ft.)
151-600	900mm (3 ft.)	1m (3-1/2 ft.)	1.2 m (4 ft.)

Working On or Near Energized Equipment

Working on live circuits means touching energized parts. Working near live circuits means working close enough to energized parts to pose a risk even though work is on deenergized parts. Common tasks where there may be a need to work on or near live circuits include, but are not limited to:

- Taking voltage measurements
- Opening and closing disconnects and breakers
- Racking breakers on and off the bus
- Removing panels and dead fronts
- Opening electric equipment doors for inspection

Precautions

When working on de-energized parts, but while still inside the arc flash protection boundary for nearby live exposed parts:

- Employees shall not reach blindly into areas that might contain exposed live parts.
- Employees shall not enter spaces containing live parts unless illumination is provided that allows the work to be performed safely.
- Conductive articles of jewelry and clothing (such as watchbands, bracelets, rings, key chains, necklaces, metalized aprons, cloth with conductive thread, metal headgear, or metal frame glasses) shall not be worn where they present an electrical contact hazard with exposed live parts.
- Conductive materials, tools, and equipment that are in contact with any part of an employee's body shall be handled in a manner that prevents accidental contact with live parts. Such materials and equipment include, but are not limited to long

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conductive objects such as ducts, pipes, tubes, conductive hose and rope, metallined rules and scales, steel tapes, pulling lines, metal scaffold parts, structural members, and chains.

• When an employee works in a confined space or enclosed spaces (such as a manhole or vault) that contains exposed live parts, the employee shall use protective shields, barriers or insulating materials as necessary to avoid contact with these parts. Doors, hinged panels, and the like shall be secured to prevent them from swinging into employees. Refer to the confined space entry program.

When it is required that work be done on any live circuit:

- An assessment shall be made prior to the work to determine if the work needs to be done with the circuit energized.
- If the parts cannot be de-energized, an "Energized Work Permit" will be required. The permit shall be completed prior to doing any work. The Safety Officer shall be notified of all permits. In the event the Safety Officer is not available; the Plant Operations Director or Facility Director may sign for the Safety Officer.
- Barriers such as insulated blankets must be used to protect against accidental contact or PPE must be worn.

Personal Protective Equipment

General Requirements

- Employees working in areas where there are potential electrical hazards must be provided with and use personal protective equipment (PPE) that is appropriate for the specific work to be performed. The electrical tools and protective equipment must be specifically approved, rated, and tested for the levels of voltage of which an employee may be exposed.
- Employees shall wear nonconductive head protection whenever there is a danger of head injury from electric shock or burns due to contact with live parts or from flying objects resulting from an electrical explosion.
- Employees shall wear protective equipment for the eyes whenever there is a danger of injury from electric arcs, flashes, or from flying objects resulting from an electrical explosion.
- Employees shall wear rubber insulating gloves where there is a danger of hand or arm contact with live parts or possible exposure to arc flash burn. Leather 'protector' gloves shall be worn over the rubber insulating gloves. Exposures to live conductors of 50 VAC or greater requires the use of rubber insulating gloves and leather protector gloves.
- Face shields without arc rating shall not be used for electrical work. Safety glasses or goggles must always be worn underneath face shields.
- Additional illumination may be needed when using tinted face shields as protection during electrical work.

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- Electrical Protective Equipment must be selected to meet the criteria established by the American Society of Testing and Materials (ASTM) and by the America National Standards Institute (ANSI).
- Insulating equipment made of materials other than rubber shall provide electrical and mechanical protection at least equal to that of rubber equipment.
- PPE and insulated tools must be maintained in a safe, reliable condition and be inspected for damage before each day's use and immediately following any incident that can reasonably be suspected of having caused damage.
- Employees must use insulated tools and handling equipment that are rated for the voltages to be encountered when working near exposed energized conductors or circuit. Tools and handling equipment should be replaced if the insulating capability is decreased due to damage. Protective gloves must be used when employees are working with exposed electrical parts above fifty (50) volts.
- Fuse handling equipment (insulated for circuit voltage) must be used to remove or install fuses when the fuse terminals are energized. Ropes and hand lines used near exposed energized parts must be non-conductive.
- Protective shields, barriers or insulating materials must be used to protect each employee from shock, burns, or other electrical injuries while that person is working near exposed energized parts that might be accidentally contacted or where dangerous electric heating or arcing might occur.

Requirements for Proper PPE Usage and Maintenance

- A. Protective equipment must be stored and used in accordance with manufacturer's recommendations. Regular tests and inspections will be required to ensure that any equipment is still fit for purpose and use. Equipment can include but is not limited to voltage-rated gloves, arc-rated hard hats and face shields, safety glasses, hearing protection, safety footwear and arc-rated (AR) clothing.
- B. All Fire-Resistant Clothing (FRC) shall be laundered and maintained in accordance with the manufacturer's specifications. Employees are not permitted to make alterations to any FR apparel. It is recommended that a uniform company be contacted to discuss the proper care and maintenance/laundering/repair of the FR garments.
- C. In addition to the arc-rated clothing, applicable employees will also be provided with insulated hand tools, arc-rated hardhat and face-shield, and electrically-insulated rubber gloves.
- D. It is recommended that Class 00 gloves be provided to each qualified electrical worker. Class 00 gloves, along with the leather protector gloves, when worn in tandem, provide the necessary protection from electrocution and arc flash energy.

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Bear in mind that Class 00 gloves only provide voltage protection up to 500V. If exposures of greater than 500V are anticipated, gloves with higher voltage protection shall be required.

- E. Electrically-insulated rubber gloves are required to be inspected each day (prior to use) by the qualified employee, and tested every six (6) months by a certified third party. The certified third party shall mark each glove with their company name and the date of the inspection.
- F. Any additional PPE (fall protection, cut protection, eye protection, etc.) shall be determined by a Job Hazard Analysis (JHA) of the task.
- G. Prior to establishing an electrically safe work condition, all qualified persons within the flash protection boundary of a presumed live component must be suitably protected with personal protective equipment for that specific hazard category. Once an electrically safe work condition has been established and verified, electrical personal protective equipment can be removed.
- H. Conductive articles of clothing or jewelry (such as watchbands, bracelets, rings, key chains, pens, necklaces, metalized aprons cloth with conductive thread, metal headgear, metal frame glasses, etc.) shall not be worn where they present an electrical contact hazard with live parts, unless they are rendered non-conductive by covering or wrapping with insulated material.
- I. All unqualified personnel shall be kept a safe distance from exposed energized components. Safe distance shall be the longer of the two boundaries (Shock and Flash Protection).

Insulated Tools and Materials

- Only insulated tools and equipment shall be used when exposed to energized parts.
- Insulated tools shall be rated for the voltages on which they are used.
- Insulated tools shall be designed and constructed for the environment to which they are exposed and the way they are used.
- Fuse or fuse holder handling equipment, insulated for the circuit voltage, shall be used to removed or install a fuse if the fuse terminals are energized.
- Ropes and hand-lines used near exposed energized parts shall be nonconductive.
- Portable ladders used for electrical work shall have nonconductive side rails.

Program Review

This program will be reviewed by the Plant Operations Director, DHHS Safety, Site Supervisors, and/or their designee and updated as necessary.

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The review includes the following:

Plant Ops Director or Site Supervisor

- Evaluate the efficacy of the procedures in the program and update as necessary Annually
- Evaluation of Qualified Person Annually
- Review incident energy analysis every 5yrs
- Meet with Safety Officer to review all electrical incidents within 48hrs

Safety Officer

- Field audit to ensure policy is being followed Annually
- Review documentation (permit, training, etc..) to ensure policy is being followed Annually
- Accident investigations must follow the DHHS Accident Investigation Policy.
- Meet with Plant Ops Director or designee to review all electrical incidents within 48hrs

DHHS Safety Programs

Review policy for compliance – every 3yrs

Policy Adoption

- Facilities/Divisions shall adopt this policy in its entirety except for this section Policy Adoption and as identified in this section.
- The intent of this policy is to ensure the facility/division is in compliance with the applicable requirements. The policy states what the facility/division shall do, not necessarily how the facility/division is to do it, unless the requirements state how. Some flexibility to modify the policy is automatically provided and more flexibility is provided with approval from DHHS Safety Program.
- Facilities/Divisions may make the following content changes without approval from DHHS Safety Program, provided responsibility doesn't change:
 - May change the formatting.
 - May substitute or add the facility/division name.
 - May substitute a specific job title.
 - May substitute a more detailed facility/division method of reporting deficiencies for repair to Plant Operations.
 - May substitute a more detailed facility/division performance improvement process.
 - Facilities/Divisions are required to obtain approval from DHHS Safety Program for any other changes to content.

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29 CFR 1910, Subpart S 29 CFR 1926, Subpart K NFPA 70E, 2015 edition