

Overview Of Cal/OSHA's Injury & Illness Prevention Program Standard

Every California employer, including school districts around the State, is required by Cal/OSHA to establish, implement and maintain a written Injury and Illness Prevention Program (IIPP). This written plan describes your district's health and safety program and how you will implement the following eight elements that are required by the Cal/OSHA standard:

- Assignment of the responsibility for safety
- Assessment of workplace hazards
- Investigation of accidents or exposures for underlying causes
- Correction of hazards
- Communication with employees and methods for involving them in safety-related activities
- Occupational safety and health training
- Systems for ensuring employee compliance with safety procedures
- Recordkeeping and documentation of your program and program activities. (Although the recordkeeping element is not required for school districts, it is highly recommended as a way to keep track of your safety efforts.)

The Cal/OSHA IIPP standard is contained in Title 8 of the California Code of Regulations, Section 3203 (T8 CCR §3203). A copy of the standard is attached (Appendix A).



Using SASH's Model IIPP Program For Schools



Developing an effective Injury and Illness Prevention Program (IIPP) involves setting health and safety goals, assigning the right people to be in charge, and then coming up with a plan that complies with Cal/OSHA requirements while meeting the individual needs of your school district. Decide what you want to accomplish, and determine what steps are necessary to achieve your goals. Then, plan out how and when each step will be carried out and who will do it. Put this plan in writing.

A copy of the written program must be maintained at the district office as well as at each school in the district. All school employees must be informed about the program and how the elements of the program are carried out in your district. You must regularly review and update your IIPP in order for it to remain effective.

You can use the School Action for Safety and Health (SASH) Program's electronic, online IIPP template, Injury and Illness Prevention Program for California School Districts, to help you document the elements of your program. Go to the SASH webpage at www.dir.ca.gov/chswc/sash to access the template. Use this template (or other form if you prefer) to document how you will carry out the requirements of each element. Although use of this particular model template is not required, it matches Cal/OSHA's model template and can help you prepare your written program.

The following sections describe the suggested steps to take to establish and implement your IIPP.

Open the Injury and Illness Prevention Program for California School Districts on www.dir.ca.gov/chswc/sash and let's get started. The form is in Microsoft Word.

Start by typing in your school district's name and address and your own name and contact information.

Assignment of Responsibilities

Identify Your District's IIPP Administrators and Assign Responsibilities

An essential first step to developing your IIPP is identifying the individual (or individuals) who will be in charge of your safety program and establishing their roles and assignments. The person, or persons, assigned the responsibility for your injury and illness prevention program must be identified by name in your written IIPP. These individuals who have the authority and responsibility for your district's safety and health program must be given full support by the district's administration and school board.

In most school districts in California, the individuals responsible for employee health and safety activities include someone from Human Resources and/or Risk Management and the district-level Director of Maintenance and Operations (M&O). Even if M&O staff have not previously been assigned this duty, they are often the first people called upon by school employees to address safety issues and have an important role to play in IIPP activities.

On your template, type in the name of the IIPP Administrator and any co-administrators. Also indicate what responsibilities the Administrator(s) will have regarding safety for your district.





Determine Who Can Help You Develop and Implement Your Program

There are many individuals who can be called upon to help you develop and implement your district's IIPP. These include risk managers and health and safety specialists from the school district's JPA (Joint Powers Authority) which handles insurance for your district, the unions, the SASH Resource Center at UC Berkeley, and Cal/OSHA Consultation Service.

If you have several schools within your district, it is a good idea to identify at least one person from each school site to be in charge of employee safety for that site. A system should be developed for having these "school site safety coordinators" regularly communicate with the district's IIPP Administrator(s). The SASH Program recommends that a district-wide health and safety committee be established that includes the school-site safety coordinators. You may also want to consider inviting representatives from your JPA and the unions to these committee meetings. See page 16 of this Guide for more information about health and safety committees.

On your template, note that the box that says "This IIPP applies to all schools in our district" is checked. This is required.

If you choose to identify school site safety coordinators, click the box, open the document, Form A: School Site Safety Coordinators, and type in the name(s) of your district's school site safety coordinators.

Indicate what responsibilities for safety the school site safety coordinators will have.

Hazard Assessment/Inspection

School districts must have a system in place for periodically assessing each school work environment for health and safety hazards that can cause injuries and illnesses. Assessing hazards can be accomplished by conducting regular inspections of each school and district work environment and by collecting information from employees through surveys, interviews or other methods. The inspection will tell you what hazards exist in the school environments and the conditions, equipment and procedures that could be potentially hazardous. It is also helpful to ask employees for their ideas about potential hazards, whether or not they are experiencing symptoms of work-related problems, and any ideas they have for solving safety issues.

For more information about common health and safety hazards in schools, see the SASH Program's factsheet, *Understanding Job Hazards*. The SASH Program also has a sample inspection checklist to assist you in identifying potential hazards in your school environments. For answers to technical questions about your program or school-related health and safety issues in general, contact the SASH Program staff at UC Berkeley and/or Cal/OSHA Consultation Service. See the *SASH Resource List* for contact information.

On your template, check the boxes that indicate who will be responsible for conducting inspections.

The required schedule for inspections is noted. You also have the option of conducting inspections at other times. Type in any other times your district will conduct inspections.



Investigation of Injuries, Illnesses, and Near Misses

Investigate Accidents to Target Prevention Efforts

Although the goal is to prevent injuries, illnesses, and exposures, when accidents or near misses do occur, they can provide a good opportunity to identify health and safety problems and target prevention efforts. Your investigation report should be in writing and adequately identify the cause(s) of the incident or near miss, including underlying factors that may have contributed to it. See the SASH factsheet, *Underlying Causes of Injury and Illness*, for more information.

Accident investigations should be conducted by trained individuals and with the primary focus of understanding why the incident or near miss occurred and what actions can be taken to prevent recurrence. The SASH Program's tool, *Investigation of Accidents, Injuries, and Near Misses*, can help you to document your incident investigations.

The template offers some suggestions for how and when to conduct an investigation. Check those practices used by your district.



Hazard Correction

Reduce or Eliminate Hazards in the School Environment

Once hazards are identified, they must be controlled. Hazards are required to be addressed as soon as possible after they are identified. You need to establish a system for correcting hazards which includes the policy that whenever there is an imminent hazard that can't be immediately corrected, all exposed employees will be immediately removed from the area. You also must make sure any employees that are addressing hazards have the proper training and equipment.

There are various methods that can be used to protect workers from hazards. Not all controls are equally effective -- there is a hierarchy of possible solutions.

The most effective solutions are those that actually **remove the hazard** (for example, substituting non-toxic cleaning chemicals for toxic chemicals, having a machine do a hazardous job instead of an employee, using a ventilation system). If the hazard can't be removed altogether, establishing **policies and procedures** that limit exposure to a hazard can help reduce the risk (for example, using two people to lift a heavy object). **Personal protective equipment** (such as goggles, respirators, gloves, non-slip shoes) are worn on the body to protect the worker from being directly exposed to the hazard and in some cases, may be necessary. Often a combination of methods is needed to get the best protection. See the SASH factsheet, *Controlling Hazards*, for more information.

The SASH Program's tool, *Hazard Correction Tracking Form*, can help you keep track of the health and safety problems you've identified and your plans for addressing these problems.

On your template, both items in the Hazard Correction section are required and should be checked. Also indicate which hazards are present in your district. Attach your plans/policies for addressing these hazards.



Communication with Employees about Safety

Communicate with Employees about the Health and Safety Program and Their Responsibilities

Your program must include a system for communicating with employees and involving them in your injury and illness prevention program. Communicating with employees can take place through trainings, meetings, announcements, email notices, memos, newsletters, and/or through the activities of a health and safety committee.

All employees must be informed of their responsibility under Labor Code Section 6407.1, which requires every employee to comply with the employer's occupational safety and health procedures. Your safety communications system must also include a method for encouraging employees to report potential hazards in the school environment without fear of reprisal.

Establish a Health and Safety Committee

While Cal/OSHA's IIPP Standard does not require employers to establish health and safety committees, it is highly recommended as a way of involving employees in your program and implementing an effective health and safety program. Your health and safety committee should include representatives from the schools in your district, including classified, credentialed and administrative employees. Your committee should meet regularly to plan, implement and evaluate your program. For information about establishing an effective health and safety committee, see the SASH factsheet, *Health and Safety Committees*.





If your district decides to use a labor/management safety and health committee to comply with the communication requirements of the IIPP standard, the committee must:

1. Meet regularly, but not less than quarterly;
2. Prepare and make available to the affected employees, written records of the safety and health issues discussed at committee meetings, and maintain these for review by the Division of Occupational Safety and Health (Cal/OSHA) upon request for one year;
3. Review results of the periodic, scheduled worksite inspections;
4. Review investigations of occupational accidents and causes of incidents resulting in occupational injury, occupational illness, or exposure to hazardous substances and, where appropriate, submit suggestions to management for the prevention of future incidents;
5. Review investigations of alleged hazardous conditions brought to the attention of any committee member. When determined necessary by the committee, the committee may conduct its own inspection and investigation to assist in remedial solutions;
6. Submit recommendations to assist in the evaluation of employee safety suggestions; and
7. Upon request from Cal/OSHA, verify abatement actions taken by the employer to abate citations issued by Cal/OSHA.

On your template, the required practices with respect to communicating with employees about safety have been checked. Type in how often you will hold safety meetings. Also type in an explanation for how employees will be able to anonymously inform administration about workplace hazards, if they so desire. You have the option of adding other methods you will use to involve and communicate with employees about safety. Type in any additional methods.

Training and Instruction

Training is one of the most important elements of any Injury and Illness Prevention Program. It allows employees to learn their job properly, brings new ideas into the workplace, reinforces existing ideas and practices, and puts your program into action. An effective Injury and Illness Prevention Program includes training for both supervisors and employees.

What Health and Safety Training is Required?

The IIPP standard requires that training be provided to all workers on the hazards in their workplace when they start working for their employer, whenever they are given a new job assignment, and whenever new procedures and equipment are introduced.

Two other Cal/OSHA training standards that affect most workers are Cal/OSHA's Hazard Communication Standard, which requires training on any chemicals to which employees may be exposed, and the Emergency Action Plan standard, which requires training on how to respond to emergencies in the workplace. The Lead and Asbestos standards require training for employees working with lead paint and/or asbestos insulation. To find out which training requirements affect your employees, go to www.dir.ca.gov/dosh/dosh_publications/TrainingReq.htm, or contact the SASH Resource Center.

How Should Health and Safety Training be Conducted?

You may need outside professionals to help you develop and conduct your required training program. Help is available from the Commission on Health and Safety and Workers' Compensation (CHSWC), the Labor Occupational Health Program (LOHP) at UC Berkeley, the Labor Occupational Safety and Health (LOSH) Program at UCLA, the Cal/OSHA Consultation Service, your workers' compensation insurance carrier, private consultants and vendor representatives. Use the SASH tool, *Employee Training Record*, to monitor which employees have had health and safety training, the dates of training, and the topics covered.

On your template, you will see that training is required in many situations, such as when the IIPP is first established. These required times are already checked.



Employee Compliance with Safety Procedures

Establishing safety rules and work procedures is an important element of your Injury and Illness Prevention Program (IIPP). Each district should have rules and procedures that make sense for your school sites. Involve employees in creating these procedures.

Make sure clear safety procedures have been developed for each occupation in the district and that rules for safely handling any new health or safety hazards that are introduced into the school environment are spelled out. You and your school site safety coordinators should periodically review and update all rules and procedures to make sure they reflect present conditions.

The IIPP standard requires that employers establish a system for ensuring that employees follow safety rules. Make sure the system your district creates does not discourage employees from reporting their injuries or symptoms. Your plan for ensuring that employees comply with safety rules must include informing them of the provisions of your IIPP, evaluating their safety performance, and providing training to employees whose safety performance is deficient. It may also include recognizing employees who perform safe and healthful work practices or other methods of insuring compliance.

Note: Programs that reward employees for a number of days without an injury are **not** recommended because they can discourage reporting of injuries or early symptoms of a health problem. Early reporting of symptoms of musculoskeletal disorders and other work-related problems can help you address hazards before they cause more serious injuries.

Your plan should also include procedures for handling emergency situations and must include a list of emergencies that could arise and a set of procedures for responding to each situation. Some emergency procedures, such as those covering medical emergencies or fire evacuation, are mandated by Cal/OSHA regulations. See the SASH factsheet, *Preparing for Emergencies at School*, for information about planning for emergencies in the school environment.

On your template, the required practices with respect to employee compliance have been noted. Select any optional practices, and type in any additional descriptions of how the district will ensure assure compliance with health and safety procedures.



Recordkeeping and Documentation

Although school districts must maintain a written IIPP, they are not required to keep records or documentation of how the elements of their IIPP are carried out. However, school districts are strongly encouraged to maintain such records to help them more efficiently and effectively implement their IIPPs. Recordkeeping can enable you to learn from past experience, identify patterns of injury and illness, and help target prevention efforts. Records can also help you document your successes, such as lower rates of injuries, incidents and correction of health and safety problems.

Examples of records that are important to keep include:

- 1. Injury and illness records.** During the year, regularly review these records to see where your injuries and illnesses are occurring. Look for any patterns or recurring situations. These records can help you identify hazardous areas in your school sites and pinpoint where immediate corrective action is needed.
- 2. Records of accidents, incidents and “near misses.”** Serious injuries and illnesses are required to be reported to Cal/OSHA within 8 hours of the school district knowing of the injury. Serious injuries and illnesses include in-patient hospitalizations longer than 24 hours for other than medical observation, loss of any body part, or a serious degree of physical disfigurement.
- 3. Worksite inspections.** Records of scheduled and periodic inspections to identify unsafe conditions and work practices should include the name of the person(s) conducting the inspection, the hazards identified, and the action taken to correct the unsafe hazards.
- 4. Records of employee exposures** to such substances as chemicals, lead and asbestos. Include the sources of exposure and any physical examination reports, employment records, and other information. Employers using any regulated carcinogens have additional reporting and recordkeeping requirements. See Title 8 of the California Code of Regulations for details.
- 5. Documentation of safety and health training provided to employees.**
The documentation should include employee names, training dates, type(s) of training, and the name of the training provider.

On your template, check what records (if any) are kept by your school district. Also type into your IIPP form where copies of this IIPP will be located, including the master copy.

Appendix A: Title 8, Section 3203

Title 8, Section 3203. Injury and Illness Prevention Program.

- a. Effective July 1, 1991, every employer shall establish, implement and maintain effective Injury and Illness Prevention Program. The Program shall be in writing and shall, at a minimum:
 1. Identify the person or persons with authority and responsibility for implementing the Program.
 2. Include a system for ensuring that employees comply with safe and healthy work practices. Substantial compliance with this provision includes recognition of employees who follow safe and healthful work practices, training and retraining programs, disciplinary actions, or any other such means that ensures employee compliance with safe and healthful work practices.
 3. Include a system for communicating with employees in a form readily understandable by all affected employees on matters relating to occupational safety and health, including provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal. Substantial compliance with this provision includes meetings, training programs, posting, written communications, a system of anonymous notification by employees about hazards, labor/management safety and health committees, or any other means that ensures communication with employees.

Exception: Employers having fewer than 10 employees shall be permitted to communicate to and instruct employees orally in general safe work practices with specific instructions with respect to hazards unique to the employees' job assignments, in compliance with subsection (a)(3).

4. Include procedures for identifying and evaluating workplace hazards including scheduling periodic inspections to identify unsafe conditions and work practices. Inspections shall be made to identify and evaluate hazards:
 - A. When the Program is first established;

Exception: Those employers having in place on July 1, 1991, a written Injury and Illness Prevention Program complying with previously existing Section 3203.
 - B. Whenever new substances, processes, procedures, or equipment are introduced to the workplace that represent a new occupational safety and health hazard; and
 - C. Whenever the employer is made aware of a new or previously unrecognized hazard.
5. Include a procedure to investigate occupational injury or occupational illness.
6. Include methods and/or procedures for correction of unsafe or unhealthy conditions, work practices and work procedures in a timely manner based on the severity of the hazard:
 - A. When observed or discovered; and
 - B. When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/ or property, remove all exposed personnel from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided the necessary safeguards.

7. Provide training and instruction:

A. When the program is first established;

Exception: Employers having in place on July 1, 1991, a written Injury and Illness Prevention Program complying with the previously existing Accident Prevention Program in Section 3203.

B. To all new employees;

C. To all employees given new job assignments for which training has not previously been received;

D. Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;

E. Whenever the employer is made aware of a new or previously unrecognized hazard; and

F. For supervisors to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed.

b. Records of the steps taken to implement and maintain the Pro-gram shall include:

1. Records of scheduled and periodic inspections required by subsection (a)(4) to identify unsafe conditions and work practices, including person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and action taken to correct the identified unsafe conditions and work practices. These records shall be maintained for one (1) year; and

Exception: Employers with fewer than 10 employees may elect to maintain the inspection records only until the hazard is corrected.

2. Documentation of safety and health training required by subsection (a)(7) for each employee, including employee name or other identifier, training dates, type(s) of training, and training providers. This documentation shall be maintained for one (1) year.

Exception No. 1: Employers with fewer than 10 employees can substantially comply with the documentation provision by maintaining a log of instructions provided to the employee with respect to the hazards unique to the employees' job assignment when first hired or assigned new duties.

Exception No. 2: Training records of employees who have worked for less than one (1) year for the employer need not be retained beyond the term of employment if they are provided to the employee upon termination of employment.

Exception No. 3: California labor code §6401.7 states that for employers with fewer than 20 employees who are in industries that are not on a designated list of high-hazard industries established by the Department of Industrial Relations (Department) and who have a Workers' Compensation Experience Modification Rate of 1.1 or less, and for any employers with fewer than 20 employees who are in industries on a designated list of low-hazard industries established by the Department, written documentation of the Program may be limited to the following requirements:

- A. Written documentation of the identity of the person or persons with authority and responsibility for implementing the program as required by subsection (a)(1).
- B. Written documentation of scheduled periodic inspections to identify unsafe conditions and work practices as required by subsection (a)(4).
- C. Written documentation of training and instruction as required by subsection (a)(7).

Exception No. 4: California Labor Code §6401.7 states that local governmental entities (any county, city and county, or district, or any public or quasi-public corporation or public agency therein, including any public entity, other than a state agency, that is a member of, or created by, a joint powers agreement) are not required to keep records concerning the steps taken to implement and maintain the Program.

Note 1: Employers determined by the Division to have historically utilized seasonal or intermittent employees shall be deemed in compliance with respect to the requirements for a written program if the employer adopts the Model Program prepared by the Division and complies with the requirements set forth therein.

Note 2: Employers in the construction industry who are required to be licensed under Chapter 9 (commencing with Section 7000) of Division 3 or the Business and Professions Code may use records relating to employee training provided to the employer in connection with an occupational safety and health training program approved by the Division, and shall only be required to keep records of those steps taken to implement and maintain the program with respect to hazards specific to the employee's job duties.

- c. Employers who elect to use a labor/management safety and health committee to comply with the communication requirements of subsection (a)(3) of this section shall be presumed to be in substantial compliance with subsection (a)(3) if the committee:
 1. Meets regularly, but not less than quarterly;
 2. Prepares and makes available to the affected employees, written records of the safety and health issues discussed at committee meetings, and maintained for review by the Division upon request. The committee meeting records shall be maintained for one (1) year;
 3. Reviews results of the periodic, scheduled worksite inspections;
 4. Reviews investigations of occupational accidents and causes of incidents resulting in occupational injury, occupational illness, or exposure to hazardous substances and, where appropriate, submits suggestions to management for the prevention of future incidents;
 5. Review investigations of alleged hazardous conditions brought to the attention of any committee member. When determined necessary by the committee, the committee may conduct its own inspection and investigation to assist in remedial solutions;
 6. Submits recommendations to assist in the evaluation of employee safety suggestions; and
 7. Upon request from the Division verifies abatement action taken by the employer to abate citations issued by the Division.

**Commission on Health
and Safety and Workers'
Compensation (CHSWC)**

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**SASH Resource Center
Labor Occupational Health
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University of California Berkeley
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Berkeley, CA 94720
{ P } 510-642-5507
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www.lohp.org

**Southern CA Training Partner
Labor Occupational Safety and
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For more information about the SASH Program contact the organizations above.