

Risk Management Bulletin

Volume 1 | Issue 1

Injury and Illness Prevention Program Evaluation

Are you doing everything you can?



When evaluating whether or not your injury and illness prevention program (IIPP) is in compliance and if any revisions are needed, why not go straight to the source of where employers have issues. The following is an excerpt of the Cal-OSHA Policy and Procedures Manual that Cal-OSHA inspectors use to determine if a citable offense has taken place. The tool below is very useful and will do two things very well. First, you can use this to develop your own program using a sample provided by your Leavitt Representative, and it can be used to audit your own program to make sure it will meet the IIPP standards used by the Department of Industrial Relations. As you review, take special note of the areas labeled “Sample effectiveness measure.” These are areas an inspector can examine to determine whether or not this particular section can be shown as effective or ineffective.

EFFECTIVENESS EVALUATION

The Division’s evaluation of the effectiveness of an employer’s IIP program includes, but is not limited to, a determination of the effectiveness of the following elements:

1. Responsibility: Whether the employer’s written IIP program provides the name and/or job title of the person or persons with the authority and the responsibility for implementing the program. If job title alone is used to identify the responsible person(s), a method must be available, e.g., a list of persons by job titles, by which employees can identify the name of the individual whose title is designated as the person(s) responsible for the IIP program.

Sample effectiveness measure: Are employees actually aware of whom the person is with the authority and responsibility for their IIP Program, and can they access the person if necessary?

2. Compliance: Whether a system for ensuring that employees comply with safe and healthful work practices is set forth in the employer’s written IIP program.

Sample effectiveness measure: Have employees been recognized for performing safe and healthful work practices, disciplined for performing unsafe or unhealthful work practices, or offered training or retraining programs to ensure compliance with safe and healthful work practices?

 Leavitt Group

Leavitt Pacific Insurance Brokers

3. Communication: Whether a system for communicating with employees in a form readily understandable by all affected employees about safety and health matters, e.g., meetings, training programs, posting, written communications, an anonymous notification system, is set forth in the employer's written IIP program, and whether employees are encouraged to inform their employer about hazards at the worksite without fear of reprisal.

Sample effectiveness measure: Are employees actually aware of methods to communicate with their employer about health and safety matters, and have they utilized the available communication methods?

4. Hazard Assessment: Whether procedures for identifying and evaluating workplace hazards, such as scheduled periodic inspections performed by a competent observer, are set forth in the employer's written IIP program and are performed at the following times: (a) when the IIP program is first established; (b) when new substances, processes, procedures, or equipment are introduced to the workplace that represent a new occupational safety and/or health hazard; and (c) whenever the employer is made aware of a new or previously unrecognized hazard.

Sample effectiveness measure: Does implementation of the procedures chosen by the employer result in a comprehensive evaluation of the hazards present at the workplace?

5. Accident/Exposure Investigation: Whether a procedure to investigate the occurrence of occupational injuries or illnesses is set forth in the employer's written IIP program.

Sample effectiveness measure: Does implementation of the investigational procedures chosen by the employer result in a determination of the cause(s) of the occupational injury or illness?

6. Hazard Correction: Whether methods and/or procedures for correcting unsafe or unhealthful work conditions, work practices and procedures, in a timely manner based on the severity of the hazard, are set forth in the employer's written IIP program. Specific abatement methods must be included in the employer's IIP program and must address: (a) when unsafe or unhealthful conditions, work practices, or procedures are observed or discovered; and (b) when an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, all exposed personnel must be removed from the area except those necessary to correct the existing condition. Employees necessary to correct the condition must be provided the necessary safeguards.

Sample effectiveness measure: Does implementation of the methods and/or procedures chosen by the employer to correct a workplace hazard achieve abatement of the hazard?



7. Training and Instruction: Whether an effective training program designed to instruct employees in general safe work practices and to provide specific instruction with respect to hazards specific to each employee's job assignment is set forth in the employer's written IIP program and whether the required training is provided: (a) when the program is first established; (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 into the workplace and represent a new hazard; (e) whenever the employer is made aware of a new or previously unrecognized workplace 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 and how to communicate information about those hazards effectively.

Sample effectiveness measure: Does training result in an increase in a worker's understanding of workplace hazards and an improvement in a worker's performance of safe and healthy work practices?

8. Record keeping: Whether there is adequate written documentation of the steps taken to implement and maintain the employer's program including:

- a) Records of scheduled and periodic workplace inspections, including person(s) conducting the inspections, any unsafe condition and/or work practice which has been identified, the action and timetable for correction of the identified hazards, and whether, for employers with ten or more employees, the records have been maintained for at least three years;

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

- b) Records of safety and health training, including employee name or other identifier, training dates, the type(s) of training, training providers, and whether, for employers with ten or more employees, the records have been maintained for at least three years.

EXCEPTIONS: Exceptions to the three-year maintenance rule include:

1. For employers with fewer than ten employees, a log of instructions can be maintained which provided instruction to the employee with respect to the hazards unique to the employee's job assignment when first hired or assigned new duties;
2. Also, training records for employees who have worked for less than one year for the employer need not be retained beyond the term of employment if they are provided to the employee upon termination of employment.

OPTIONAL

Labor/Management Safety and Health Committee: whether, if the employer utilizes a labor/management safety and health committee to comply with the communication requirements of the IIP program standard, the committee meets the requirements found in 8 CCR §3203(c)(1)(7).

IMPORTANT TO REMEMBER:

All of the items above that were mentioned as “effectiveness measures” must be documented to prove they are being done. Any interview an inspector does with employees will likely simply augment what the documentation will prove. This, of course, is not an all-inclusive list, but the above document should show potential holes in the IIPP and may provoke thought as to what may need to be done in your specific company to protect your employees from injury and protect the company from unnecessary Cal-OSHA citations.



Leavitt Pacific Insurance Brokers