



**LOS ANGELES UNIFIED SCHOOL DISTRICT
POLICY BULLETIN**

TITLE: Injury and Illness Prevention Program Requirements
NUMBER: BUL-3772.3
ISSUER: John Sterritt, Director
Office of Environmental Health and Safety

Enrique G. Boull't, Chief Operating Officer
Office of the Chief Operating Officer
DATE: August 26, 2013

ROUTING

All Schools and
Offices

POLICY: California Code of Regulations and Board Rule 2351 mandate that the District maintain a safe and healthy workplace for employees. These regulations require that each work location have a written Injury and Illness Prevention Program (IIPP) with specific responsibilities and procedures to prevent employee injuries and illnesses. As a result, each District site must have a written IIPP that is reviewed bi-annually and revised whenever there is a change in the site administrator or other personnel listed in the IIPP, there is a change in operations, or when new regulations have been issued. The IIPP must be available for review by an Occupational Safety and Health Administration (OSHA) Compliance Officer during an inspection or accident investigation conducted at their facility.

MAJOR CHANGES: This Bulletin replaces Bulletin No. BUL-3772.2, "Illness and Injury Prevention Program Requirements," issued by the Office of Environmental Health and Safety (OEHS) dated June 4, 2012. The requirements to review bi-annually (in alignment with the Administrators Certification On-line System) and to require employees to attend periodic safety meetings have been added.

BACKGROUND: Since 1991, employers in California have been required to have an effective written IIPP. The benefits of an effective IIPP include improved workplace safety and health, better morale, increased productivity, and reduced costs of doing business.

The Corporate Criminal Liability Act (California Penal Code Section 387) holds managers and corporations liable for concealing knowledge of a serious danger to employees. The failure to warn employees and to report it to regulatory agencies within 15 days of awareness, or immediately if there is imminent risk of great bodily harm or death, may result in assessment of personal fines up to \$25,000 and/or imprisonment for up to three years. California Labor Code Section 6423 deems it a misdemeanor for managers or supervisors to willfully violate a safety order or standard, with penalties of up to a year in jail and fines up to \$15,000, or both.



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GUIDELINES: I. RESPONSIBILITIES OF SITE ADMINISTRATOR

1. Each site administrator must develop and implement a written IIPP specific to their site. An IIPP template has been developed to assist in compliance with this requirement. To access the template follow the link <http://www.lausd-oehs.org/injury-illness.asp> and click on the link IIPP Template (*.doc). Fill out the requested site specific information and print a completed copy of the IIPP to be kept in the main office with other District policies.
2. Training specific to the IIPP must be conducted for all employees annually and as new employees are hired. An IIPP PowerPoint Presentation has been developed to assist with the training requirements. To access the file follow the link <http://www.lausd-oehs.org/injury-illness.asp> and click on the link IIPP Training (PowerPoint). Training must be documented on sign-in sheets which can be found in the IIPP Template (Attachment D). Site administrators must not only provide health and safety training, but shall require all employees to attend periodic safety training.
3. A copy of the IIPP or a summary must be posted in the main administration building or other prominent location available to employees where notices are regularly posted regarding rules, regulations, and procedures (Attachment B in the IIPP Template).
4. The IIPP must be available for review by an Occupational Safety and Health Administration (OSHA) Compliance Officer during an inspection or accident investigation conducted at their facility. It is also subject to review by Office of Environmental Health and Safety staff.
5. The IIPP must be reviewed bi-annually by the site administrator and updated if there have been changes in personnel listed in the IIPP or changes in operations. These reviews must be conducted in accordance with the most current on Administrator Certification On-line System Memorandum. The Administrator Certification On-line System is designed to assist schools and offices to electronically certify that the required actions and activities have been completed in accordance with District nondiscrimination and safety mandates, policies, and procedures. Compliance with IIPP requirements are tracked through the Administrator Certification On-line System.
6. Accident investigations must be documented and submitted electronically using the Incident System Tracking Accountability Report (ISTAR) within 24 hours.
7. Serious employee injuries must be reported to Cal/OSHA within 8 hours



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of the incident. The site administrator shall also notify OEHS of these incidents within the same time frame.

II. MANDATORY ELEMENTS OF AN IIPP

Each site administrator is responsible for preparing, maintaining and implementing an IIPP at their location which must include each of the eight requirements listed below:

1. The identity of the person(s) at a specific site with authority and responsibility for implementing the program.
2. A system for ensuring that employees comply with safe and healthy work practices including training programs, disciplinary action, recognition, or other means.
3. A system for communicating with employees on matters relating to occupational safety and health including meetings, training programs, postings, safety committees or other means.
4. A system for identifying and evaluating workplace hazards, including written scheduled periodic inspections at least twice each year to identify unsafe conditions and work practices.
5. A procedure to investigate occupational injuries and illnesses.
6. A system for correcting unsafe or unhealthy conditions, work practices, or work procedures in a timely manner based on the severity of the hazard.
7. Training and instruction for new employees; when new hazards are introduced; employees given new job assignments, and for supervisors based on job specific hazards.
8. A system for recordkeeping and documenting each of the above requirements.

III. MONITORING

1. The OEHS representative assigned to each site will review the written IIPP during periodic visits to ensure that all required elements are included and have been implemented. A comprehensive review of the site specific program is also conducted during routine Safe School Inspections.
2. An OEHS representative will provide site administrators with IIPP implementation assistance if requested.
3. OEHS will issue a written Corrective Action Notice (CAN) to the site administrator for any requirement that has not been implemented.
4. Site administrators are responsible for ensuring their written IIPP is completed and on file. Failure to do so may result in fines or other legal sanctions which are payable by the facility cited and potential disciplinary action against the site administrator.



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- AUTHORITY:**
- Board Rule 2351
 - California Code of Regulations, Title 8, Section 3203
- RELATED RESOURCES:**
- *Accident Investigating & Reporting*, Safety Alert #04-14 dated April 12, 2012, issued by the Office of Environmental Health and Safety.
 - *Act of Violence*, Bulletin No. BUL-5047.1, dated April 22, 2013, issued by the Division of Risk Management and Insurance Services.
 - *Administrator Certification On-line System*, Memorandum No. MEM-4207, issued annually by the Office of General Counsel
 - *Injury & Illness Prevention Plan*, issued by the Office of Environmental Health and Safety.
 - *Safe School Inspection Guidebook*, issued by the Office of Environmental Health and Safety.
 - *Safe School Plan Updates*, Reference Guide No. REF-5511 issued annually by the Office of School Operations.
 - *Workers' Compensation Procedures*, Reference Guide No. REF-1279.0, dated September 3, 2004, issued by Risk Management and Insurance Services.
 - *Incident System Tracking Accountability Report*, Bulletin No. BUL-5269.1 dated August 14, 2012 issued by the Office of the Superintendent.
- ASSISTANCE:** For assistance or further information, contact the Office of Environmental Health and Safety at 213-241-3199 or at <http://www.lausd-oehs.org>.