

# JPIASource

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ACWA JPIA Risk Management for the Water Industry

## Injury Illness Prevention Program (IIPP)

What is an Injury and Illness Prevention Program (IIPP) and why is it important? An IIPP is a basic safety program tailored to your agency and designed to keep employees safe at work. It includes a written plan outlining safety practices, procedures, and resources available to all employees, and it must comply with Cal/OSHA's IIPP requirements ([8 CCR 3203](#)). Cal/OSHA highlights that an IIPP is not a paper program. How well your IIPP meets Cal/OSHA's standard depends on your agency addressing all program elements and *effectively* putting them into place.



An effective IIPP shows workplace safety is important at your agency and guides staff to work safely. Building and maintaining a culture of workplace safety is an important element in any agency's effort to reduce workplace injuries or illnesses. Worker familiarity with the IIPP is essential to establishing and maintaining the proactive processes with identifying and controlling hazards in the workplace. With this goal in mind, Cal/OSHA recently revised its IIPP standard to include an employee access provision.

Prior to the rule change, Cal/OSHA required employers to develop a written IIPP; however, there was no specific requirement that employers share or make those plans available to employees. Cal/OSHA's new IIPP "**access**" requirement strives to improve workplace safety by helping employees understand how to communicate hazards to the employer, and assist with a worker's understanding of the IIPP and the role an employee has in creating a safe workplace. As of July 1, 2020, employers must now inform employees of their right to receive a copy of your agency's written IIPP and how to receive it.

Employers have two options to comply with the standard:

- Post an electronic copy on the employer's website or intranet. Ensure employees can easily review, download, and/or print the electronic IIPP.
- Provide a printed copy, within five days of request, unless the employee or designated representative agrees to receive an electronic copy. One printed copy will be provided free of charge.

The revised rule also requires "access" information to be in your agency's written IIPP. To comply, your agency can either update its existing written IIPP to include access information or add an IIPP addendum. A sample "IIPP Access" addendum is attached.

For your agency's IIPP to be effective, all employees must be actively involved. Cal/OSHA promotes employees' understanding of their IIPP as a cornerstone and should be reviewed with staff annually.

## Additional Resources:

JPIA Risk Control Manual - [Section 1 – Injury Illness Prevention Program](#)  
[Cal/OSHA Sample – Injury & Illness Prevention Model Program for High Hazard Employers](#)  
[Cal/OSHA Sample – Injury & Illness Prevention Model Program for Non-High Hazard Employers](#)  
[Cal/OSHA Guide to Developing Your Workplace Injury Illness Prevention Program](#)  
[Cal/OSHA Guide to Developing Your Workplace Injury Illness Prevention Program](#)

*Note: As of this publication release, Cal/OSHA's Injury Illness Prevention Program e-tools webpages are under revision. You may find sample IIPP model program templates, with the updated access content, on [Cal/OSHA's publications webpage](#).*

The JPIASource is not intended to be exhaustive. The discussion and best practices suggested herein should not be regarded as legal advice. Readers should pursue legal counsel or contact their insurance providers to gain more exhaustive advice.

## Make This Article a Tailgate Topic

### Tailgate Topic: IIPP Review

- Use your agency's written IIPP or the OSHA IIPP Factsheet and summarize highlights; or
- Take the IIPP Access Addendum and review it with staff (page 7).
- Have all in attendance sign it or a tailgate training record.
- Post the IIPP Addendum on your agency's communication board or safety posters. Ensure a copy of the IIPP Addendum is attached to your written IIPP.

## Make This Article a Safety Meeting

### Safety Meeting Topic: IIPP Written Plan Self-Audit Checklist

- Use the JPIA's Sample IIPP Self-Audit Checklist (pages 5-6) to assess your agency's IIPP. This checklist is a quick reference tool designed to compare an employer's written plan to the eight program elements required in the IIPP standard.

## Injury and Illness Prevention Programs

**Injury and Illness Prevention Programs are proactive processes that can substantially reduce the number and severity of workplace injuries and illnesses and can alleviate the associated financial burdens on U.S. workplaces. These systematic programs allow employers and workers to collaborate on an ongoing basis to find and fix workplace hazards before workers are hurt or become ill. This Fact Sheet describes some common program elements and how to implement them.**

Injury and Illness Prevention Programs are an effective tool for reducing occupational injuries, illnesses and fatalities. Many workplaces have already adopted such approaches, for example, as part of OSHA's Voluntary Protection Programs (VPP) and Safety and Health Achievement Recognition Program (SHARP) for small employers. Not only do these workplaces experience significant decreases in workplace injuries, but they often report a transformed workplace culture that can lead to higher productivity and quality, reduced turnover, reduced costs and greater worker satisfaction.

Thirty-four states and many nations around the world already require or encourage employers to implement similar programs. Based on the positive experience of these employers, OSHA believes that Injury and Illness Prevention Programs can provide the foundation for breakthrough changes in the way employers and their workers identify and control hazards, leading to a significantly improved workplace health and safety environment. Adoption of an Injury and Illness Prevention Program will result in workers suffering fewer injuries, illnesses and fatalities. In addition, employers will improve their compliance with existing standards and experience the financial benefits of a safer and healthier workplace.

Injury and Illness Prevention Programs should include the systematic identification, evaluation and prevention or control of general workplace hazards and the hazards of specific jobs and tasks.

The major elements of an effective program include:

### Management Leadership

- Establish clear safety and health goals for the program and define the actions needed to achieve those goals.
- Designate one or more individuals with overall responsibility for implementing and maintaining the program.
- Provide sufficient resources to ensure effective program implementation.

### Worker Participation

- Consult with workers in developing and implementing the program and involve them in updating and evaluating the program.
- Include workers in workplace inspections and incident investigations.
- Encourage workers to report concerns, such as hazards, injuries, illnesses and near misses.
- Protect the rights of workers who participate in the program.

### Hazard Identification and Assessment

- Identify, assess and document workplace hazards by soliciting input from workers, inspecting the workplace and reviewing available information on hazards.
- Investigate injuries and illnesses to identify hazards that may have caused them.
- Inform workers of the hazards in the workplace.

## Hazard Prevention and Control

- Establish and implement a plan to prioritize and control hazards identified in the workplace.
- Provide interim controls to protect workers from any hazards that cannot be controlled immediately.
- Verify that all control measures are implemented and are effective.
- Discuss the hazard control plan with affected workers.

## Education and Training

- Provide education and training to workers in a language and vocabulary they can understand to ensure that they know:
  - Procedures for reporting injuries, illnesses and safety and health concerns.
  - How to recognize hazards.
  - Ways to eliminate, control or reduce hazards.
  - Elements of the program.
  - How to participate in the program.
- Conduct refresher education and training programs periodically.

## Program Evaluation and Improvement

- Conduct a periodic review of the program to determine if it has been implemented as designed and is making progress towards achieving its goals.
- Modify the program, as necessary, to correct deficiencies.
- Continuously look for ways to improve the program.

For more information, visit the Injury and Illness Prevention Program page on OSHA's website at: [www.osha.gov/dsg/topics/safetyhealth](http://www.osha.gov/dsg/topics/safetyhealth).

Twenty-seven states operate their own occupational safety and health programs approved by OSHA. States enforce similar standards that may have different or additional requirements. A list of state plans is available at [www.osha.gov/dcsp/osp](http://www.osha.gov/dcsp/osp).

**This is one in a series of informational fact sheets highlighting OSHA programs, policies or standards. It does not impose any new compliance requirements. For a comprehensive list of compliance requirements of OSHA standards or regulations, refer to Title 29 of the Code of Federal Regulations. This information will be made available to sensory-impaired individuals upon request. The voice phone is (202) 693-1999; teletypewriter (TTY) number: (877) 889-5627.**

**For assistance, contact us. We can help. It's confidential.**



U.S. Department of Labor  
**[www.osha.gov](http://www.osha.gov) (800) 321-OSHA (6742)**

Agency Name:  
Date of IIPP:  
IIPP Review Date:

<u>IIPP Element</u>	Requirements (reference Cal/OSHA Enforcement Policy)	Written	Implemented	Effective	Comments or Suggestions (Specific to your operation)
Responsibility 3203 (a)(1)	Persons with authority and responsibility for implementing program are properly identified				
Compliance 3203 (a)(2)	System for ensuring employees comply with safe and healthful work practices				
Communication 3203 (a)(3)	System for communicating with employees in a form readily understandable by all affected employees about safety and health				
Hazard Assessment 3203 (a)(4)	Procedures for identifying and evaluating workplace hazards to include scheduled inspections				
Accident/Exposure Incident 3203 (a)(5)	Procedure to investigate occurrences of injuries or illnesses				
Hazard Correction 3203 (a)(6)	Methods for correcting unsafe work conditions, work practices, in a timely manner based on seriousness of hazard				
Training & Instruction 3203 (a)(7)	Training program to instruct on general and job-specific safety and health practices				

Agency Name:  
Date of IIPP:  
IIPP Review Date:

<u>IIPP Element</u>	Requirements (reference Cal/OSHA Enforcement Policy)	Written	Implemented	Effective	Comments or Suggestions (Specific to your operation)
Access and Recordkeeping 3203 (a)(8)	Procedure providing employees with access to the written IIPP within five days of a request. Adequate documentation for inspections, training, and other standard-specific requirements				



## Sample IIPP Addendum

### Employee Access to IIPP

Our employees – or their designated representatives - have the right to examine and receive a copy of our IIPP. This will be accomplished by **[Describe how this will be accomplished using either of the following two methods:]**

\_\_\_\_\_ 1. Provide access in a reasonable time, place, and manner, but in no event later than five (5) business days after the request for access is received from an employee or designated representative.

a. Whenever an employee or designated representative requests a copy of the Program, the agency will provide the requester a printed copy of the Program, unless the employee or designated representative agrees to receive an electronic copy of the Program.

b. One printed copy of the Program will be provided free of charge. If the employee or designated representative requests additional copies of the Program within one (1) year of the previous request, and the Program has not been updated with new information since the prior copy was provided, we may charge reasonable, non-discriminatory reproduction costs for the additional copies.

\_\_\_\_\_ 2. Provide “unobstructed” access through an agency server or website, which allows an employee to review, print, and email the current version of the Program. Unobstructed access means an employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or coworkers.

**[Also, describe how employers will communicate the right and procedure to access the Program to all employees]. We will communicate the right and procedure to access the IIPP Program to all employees during \_\_\_\_\_ orientations, \_\_\_\_\_ safety meetings, \_\_\_\_\_ IIPP training updates, \_\_\_\_\_ reviews, \_\_\_\_\_ posting, \_\_\_\_\_ email communication, and acknowledgment, etc.**

Upon request, the agency will provide employees with access to the IIPP by (select one option below):

\_\_\_\_\_ 1. Providing a printed copy of the IIPP

\_\_\_\_\_ 2. Providing an electronic copy of the IIPP

Our employees can request access to a copy of the written IIPP by: (select one option below)

\_\_\_\_\_ 1. Requesting a copy from their supervisor

\_\_\_\_\_ 2. Requesting a copy from Human Resources

\_\_\_\_\_ 3. Other: (describe)

A copy of the IIPP will be provided within five (5) business days after receiving the request.

Any copy provided to an employee or their designated representative need not include any of the records of the steps taken to implement and maintain the written IIP Program.

Where the agency has distinctly different and separate operations with distinctly separate and different IIPPs, the agency may limit access to the IIPP applicable to the employee requesting it.

An employee must provide written authorization to make someone their “designated representative.” A recognized or certified collective bargaining agent will be treated automatically as a designated representative for access to the company IIPP. The written authorization must include the following information:

- The name and signature of the employee authorizing the designated representative.
- The date of the request.
- The name of the designated representative.
- The date upon which the written authorization will expire (if less than 1 year).

*This addendum is based on the new requirement of the Injury and Illness Prevention Standard, [Title 8 of the California Code of Regulations, Section 3203\(a\)\(8\)](#), that took effect on July 1, 2020. **Employers must inform employees of their right to, and means of requesting, a copy of the IIPP.***