

Injury & Illness Prevention Program



OSHA INJURY & ILLNESS PREVENTION PROGRAMS BACKGROUND

The Injury and Illness Prevention Program is a written workplace safety program required by Cal-OSHA T8 CCR3203. The written plan is a flexible tool that helps employers find hazards and fix them before injuries or illnesses can occur. The program helps employers meet their obligation under the Occupational Safety and Health Act (OSH Act) to provide every employee a place of employment which is free from recognized hazards that are likely to cause serious physical harm. It also helps employers avoid the significant costs associated with injuries and illnesses in the workplace.

California began to require Injury and Illness Prevention Programs in 1991. Five years after the requirement began, California had a net decrease in injuries and illnesses of 19 percent.

Pitzer College 1050 N. Mills Ave Claremont, CA 91711

Injury & Illness Prevention Program

Approved: Jaure Schafer

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It is the policy of Pitzer College to provide a safe and healthy workplace environment for all staff, faculty, and students, and to ensure compliance with all workplace safety regulations set forth by Title 8 of the California Code of Regulations. This policy is extended to all employees, students, outside contractors and visitors of Pitzer College.

The Injury and Illness Prevention Program (IIPP) serves as the key guidance document for all employees to ensure compliance with Cal OSHA regulations, California Code of Regulations Title 8 section 3203 (8 CCR 3203). It is also the key guidance document for the structure of the Pitzer College Health and Safety Program. This is the basis for the prevention of injuries and exposures which are critical to reducing workers compensation costs and enabling a "Best Practices Safety Culture" with a goal of zero accidents.

This Injury and Illness Prevention Plan is intended to inform the employee of safety precautions necessary to prevent or minimize hazards. This is accomplished through safety meetings, training, reporting programs, and audits. No employee will engage in or be required to perform any task that is determined to present an unreasonable risk of injury or illness.

The Eight Components of the Injury Illness Prevention Program

The IIPP is made up of eight parts as required by Title 8 of the California Code of Regulations Section (3203):

- 1. Responsible person(s) The person(s) responsible for implementing the IIPP.
- 2. Employee compliance with Safety Procedures- A system for ensuring employee compliance with health and safety workplace practices.
- 3. <u>Communication with Employees Regarding Safety</u> A method of communication with employees regarding workplace safety quickly.
- 4. <u>Hazard Assessment</u> A procedure for identifying and evaluating workplace hazards.
- 5. Hazard Correction A procedure for correcting unsafe/unhealthy conditions, practices and procedures.
- 6. Occupational Injury and Illness Investigation A procedure for investigating workplace injuries and or illnesses.
- 7. Employee Training and Instruction A procedure for training employees as outlined in Title 8 of the California code of regulations.
- 8. Recording and Employee Access to Medical Records A procedure for maintaining records for all medical procedures, tests results and training as well as allowing employees access to all medical records test results and training.

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Section 1 RESPONSIBLE PERSON(S)

1.1 Pitzer's Injury and Illness Prevention Program Administrator is:

Samantha Greer, Safety and Emergency Preparedness Coordinator; Office of Safety and Emergency Preparedness, Facilities and Campus Services.

For questions regarding the content of the Injury and Illness Prevention Program, IIPP Administrator(s) may be contacted at Samantha_greer@pitzer.edu or (909)607-4976.

- 1.2 The Responsibilities of the IIPP Administrator(s) include:
 - Prepare and update Pitzer's IIPP
 - Implement the provisions in the IIPP.
 - Investigate accidents, injuries, illnesses, and exposures in the workplace.
 - Ensure routine workplace hazard identification inspections are conducted.
 - Mitigate identified workplace hazards.
 - Provide health and safety training to employees.
 - Institute a safety committee
 - Establish a procedure for employees to report workplace hazards, accidents, injuries, illnesses, and general safety concerns.
 - Ensure all employees can identify the Injury Illness Prevention Program Administrator.

Section 2 EMPLOYEE COMPLIANCE WITH SAFETY PROCEDURES

2.1 **Employee Compliance**

Management is responsible for ensuring that all health and safety policies and procedures are clearly communicated and understood by all employees. Supervisors and lead personnel are expected to enforce the rules fairly and uniformly.

- 2.2 **All Pitzer employees**, including supervisors, are responsible for complying with established safe workplace practices. The Pitzer system of ensuring all employees comply with these safe workplace practices includes the following:
 - Inform employees of the provisions of the IIPP
 - Recognize employees who perform safe workplace practices. (This recognition is accomplished by the employee's immediate Supervisor, or a Safety Committee Member)
 - Fair and consistent discipline for employees who fail to comply with safe workplace practices.
- 2.3 The following outlines Pitzer's disciplinary process:
 - Verbal warning with additional safety training, if required
 - Written warning
 - Other necessary actions deemed appropriate by the employee's immediate supervisor.
 - Evaluate the safety performance of all employees.
 - Provide training for employees whose safety performance is deficient.

2.4 The Compliance Responsibilities of Supervisors and Managers

Managers and supervisors are responsible for ensuring that employees have received the appropriate safety training prior to starting their assigned jobs. In addition, managers and supervisors are responsible for the following:

- a. Implementing the IIPP policies, safe practices, and written programs
- b. Complete all required IIPP safety training.
- c. Conduct hazard assessments for all hazardous work areas
- d. Conduct regular safety and housekeeping inspections.
- e. Hold frequent safety meetings with personnel.

- f. Provide and require use of hazard controls and personal protective equipment where applicable.
- g. Encourage employees to report health /safety concerns and make it known there will be no reprisal for these reports.
- h. Respond to employee safety concerns and implement corrective actions promptly.
- i. Evaluate the safety performance of all employees.
- j. Recognize individuals who work in a safe manner and correct those who do not.
- k. Stop any work that poses an imminent hazard, likelihood of injury, destruction of property or death if not discontinued immediately to personnel other individuals or the Safety Coordinator
- l. Assign appropriate safety training to employees prior to beginning work, retrain when they do not demonstrate good safe practices, and implement routine/continuous training as required by OSHA.
- m. Provide access to and train personnel on the emergency evacuation plan and demonstrate how to locate the assigned assembly areas.
- n. Report all occupational injuries, illnesses, safety concerns and incidents to the Safety Coordinator
- o. Conduct initial injury and incident investigations promptly so as to determine the root cause and implement corrective actions in order to prevent future incidents.

2.5 Employee Responsibilities

It is the responsibility of all employees, students, outside contractors, and visitors who work with hazardous machinery, equipment, or processes to receive training on the use of machinery equipment or process prior to starting work. The employee is responsible for the following:

- Report unsafe conditions, workplace practices, incidents, near miss incidents, or injuries to immediate Supervisor or Safety Coordinator immediately.
- b. Use hazard controls and personal protective equipment required and as trained by supervisors.
- c. Complete all required safety training prior to beginning work or as assigned by supervisors or Facilities and Campus Services Safety Department
- d. Participate in all safety meetings as assigned by supervisor.

- e. Read and follow all health and safety-related signs, posters, warning signals and directions.
- f. Become familiar with building evacuation plans and assembly areas for assigned work areas.
- g. Cooperate with and assist in accident and incident investigations, as necessary.

Section 3 COMMUNICATION WITH EMPLOYEES REGARDING SAFETY

- 3.1 **All supervisors** are responsible for communicating with their employees about occupational health and safety hazards, and safeguards to all employees. The Pitzer employee communication system includes the following:
 - 1. New employee safety orientation which includes health and safety policies and procedures and a review of the injury and illness prevention program.
 - 2. A system for employees to anonymously inform management of workplace hazards without fear of reprisal.
 - 3. Employees may report unsafe workplace conditions through any of the following methods:
 - a. Inform their immediate supervisor.
 - b. Inform the Facilities and Campus Services Department
 - c. Inform the Safety and Emergency Preparedness Coordinator
 - d. Call the Safety and Emergency Preparedness Coordinator (909) 607-4976 or ext. 74976.
 - e. Email the Safety and Emergency Preparedness Coordinator at Samantha greer@pitzer.edu
 - f. Fill out an "Unsafe Condition Report," (Attachment 1) and submit to the Facilities Department
 - 4. Regularly scheduled safety meetings held quarterly or as deemed necessary by the identification of hazards or the frequency of injuries and illnesses.
 - 5. Communicating with employees via emails, Pitzer website, department postings, handouts, posters flyers and safety meetings

3.2 Communication Requirements

The Emergency Management Committee (EMC) along with the assistance of Human Resources will maintain the communication requirements of the Injury and Illness Prevention Plan (IIPP) standard. As required, the committee will meet regularly (quarterly, at minimum), to conduct the following:

- Prepare written records of the safety and health committees' meetings.
- Review results of the periodic scheduled inspections

- Review investigations of incidents and exposures and make suggestions to management for the prevention of future incidents.
- Review investigations of alleged hazardous conditions and submit recommendations to assist in improving employee safety.
- 3.3 The Claremont Colleges Services (TCCS) has elected to use Everbridge Public Warning platform for emergency notifications to all the 7C's. All employees and students of Pitzer College are automatically enrolled in the emergency notification system upon start of enrollment and employment. In the case of an emergency affecting the colleges, Campus Safety will send a mass notification.
- 3.4 Emergency Management Committee in partnership with Human Resources are responsible for reviewing communicated safety concerns and making recommendations on safety matters. The Claremont Colleges Services (TCCS) is responsible for specific areas of environmental safety or health concerns.

Section 4 HAZARD ASSESSMENT

4.1 Periodic inspections to identify and evaluate hazards in our workplace will be performed by the Safety and Emergency Preparedness Coordinator, Department Supervisors, Department Leads and/or employees.

Periodic inspections are performed according to the following schedule:

- When new substances, processes, procedures, or equipment are introduced into the workplace which may present the potential for new hazards.
- When new, previously unidentified hazards are recognized.
- When occupational injuries and illnesses occur
- When workplace conditions warrant an inspection
- When permanent or intermittent employees are hired and/or reassigned to perform processes, operations, or tasks for which a hazard evaluation has not previously been conducted.
- Daily by employees and supervisors
- Quarterly by supervisors
- 4.2 Employees are responsible for inspecting tools, equipment, and work areas to identify safety hazards daily. In addition, employees are responsible for reporting workplace hazards to their immediate supervisor, team lead, or Safety and Emergency Preparedness Coordinator.
- 4.3 Supervisors are responsible for conducting daily inspections of work areas/operations, conducting quarterly safety inspections, and following up on identified workplace hazards and corrections.

Supervisors may fill out an Unsafe Condition Report (Attachment 1) and submit it to the Department of Facilities and Campus Services.

Section 5 HAZARD CORRECTION

- 5.1 **Unsafe work conditions**, practices or procedures will be corrected in a timely manner based on the severity of the hazards. Corrective action is to be taken:
 - When a hazard is observed or as soon as it is discovered.
 - When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, in which case all exposed employees will be removed from the area except those necessary to correct the existing condition. (Employees who are required to correct the hazardous condition will be provided with the necessary protection and training).
 - When policies for addressing hazards identified in the workplace have been established for the following:
 - Safety
 - Chemical Safety
 - Radiation safety
 - Laser Safety
 - Laboratory & Research Safety
 - Hazardous Waste Management
 - Electrical Hazard Management
 - Emergency Management
 - Risk Management
 - Confined Spaces
 - Ergonomics (Completed by TCCS)
- All safety hazards shall be reported and documented with corrective actions initiated promptly. Many hazards can be corrected by the Department Supervisor. Other hazards may require work orders and written communications to the Facilities Department via email facilities@pitzer.edu.

CAL OSHA prohibits an employer from taking adverse action against any employee for reporting workplace safety hazards. Employees are required to report all safety hazards that present an immediate threat to life, safety or property.

5.3 **Halting Operations**

If a safety hazard is encountered which presents an immediate threat to life, health, or safety of an individual, the activity must be halted. When such a hazard is encountered, the Safety and Emergency Preparedness Coordinator, Senior Director of Facilities, Safety and Event Management, Associate Director of Maintenance & Construction, Chief of Staff, Chief Operating Officer, or department that is impacted shall be notified as soon as possible.

Section 6 OCCUPATIONAL INJURY AND ILLNESS INVESTIGATIONS

6.1 Work Related Injuries / Accidents

The Division of Labor Statistics and Research, defines an injury or illness to be work-related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment.

If an injury or illness is non-work related, meaning the cause did not occur in the work environment, yet the injury or illness impedes upon the employee's ability to perform their daily tasks, it must be reported to Human Resources upon returning to work.

Immediately upon being notified of a workplace accident or injury the supervisor of the employee is required to complete a <u>Supervisor's Report</u> whether the employee chooses to self-care or be treated via urgent care. The employee must complete an <u>Employee Injury Report</u> and submit it to their supervisor or HR within 24 hours of the incident.

- Injuries requiring medical aid Employee should contact Campus Safety.
- Head Injuries Employee should contact Campus Safety.
- Bleeding Depending on the severity of the injury, call 911 immediately.
- Minor cuts and scrapes Employee should contact Campus Safety.
- Seizures call 911. If calling from a mobile device, contact Campus Safety afterwards.
- Suspected Sprains or broken bones Employee should contact Campus Safety.
- Campus Safety can be reached by calling (909) 607-2000 or ext. 72000.
 Responding officers are trained to access injuries and provide first aid or medical services for injured employees.

6.2 **Injury Reports**

- 6.2.1 Injury reports are mandatory for any work-related incident.
- 6.2.2 If an employee is injured during their personal time off and hinders the employee from the employee must notify Human Resources upon returning to work.
- 6.2.2 In case of work-related injury or illness on campus, the employee must call the Trav Care Nurse line, with a supervisor present, to report the injury. The number for the Trav Care Nurse line is (855) 385-6037.

6.2.3 If after hours, the employee must inform the supervisor of the injury or illness and if the supervisor is not present, must notify Campus Safety and have the officer call the Trav Care Nurse line at (855) 385-6037.

6.3 **PROCEDURE**

- 6.3.1 The supervisor or Campus Safety officer will dial the Trav Care Nurse line from a safe and private location and provide pertinent information to the nurse. The employee will then speak with the nurse, in private, regarding the injury.
- 6.3.1a The supervisor or Campus Safety Officer must inform the nurse they are calling from the Claremont Colleges Services (TCCS) and Pitzer College. (It is imperative that both names are given to ensure they tag the report to the correct College as this information ends up with Travelers if triaged to Urgent Care.)
- 6.3.1b After being triaged by the nurse, the employee will then give the phone, (with the nurse on the line) back to the supervisor to convey the recommended treatment.
- 6.3.2 When Campus Safety is involved, the officer will complete his/her report and submit it to HR and the Safety Coordinator.
 - 6.3.2a HR will review the report and follow up with the employee.
- 6.3.2b If triaged to Urgent Care, HR will follow up with the employee to complete remaining documents from Worker's Compensation packet and submit the report to TCCS.
- 6.3.3 Once an injury report is completed the Safety Coordinator or HR will notify one another of the report for the purpose of checks and balances.

6.4 **Investigations**

6.4.1 The Safety and Emergency Preparedness Coordinator will conduct an internal investigation and submit the report to HR. If it is determined that repairs or corrections are required, it will be recommended in the report and submitted to the appropriate department responsible for repairs.

If there is a correction or a repair to be made, there will be a 30-day follow-up.

6.5 **PROCEDURE for investigations**

- 6.5.1 Visit the accident scene, as soon as possible, while facts and evidence are still fresh and before witnesses forget important details. Make sure hazardous conditions to which other employees or customers could be exposed are corrected or have been removed.
- 6.5.2 If possible, interview the injured worker at the scene of the accident and verbally "walk" him or her through a re-enactment. All interviews should be

conducted as privately as possible. Interview all witnesses individually and talk with anyone who has knowledge of the accident, even if they did not actually witness it.

- 6.5.2a Focus on causes and hazards. Develop an analysis of what happened, how it happened, and how it could have been prevented. Determine what caused the accident itself, not just the injury.
- 6.5.3 Report the accident findings to Human Resources at (909) 621-8254. Accidents will be reported to the insurance carrier within 24 hours. All serious accidents will be reported to the insurance carrier as soon as possible.
- 6.5.4 When there is (are) elements of controversy, a signed statement by witnesses will be required.
- 6.5.5 Thoroughly investigate the accident to identify all possible causes and contributing factors. Document details graphically. Use sketchers, diagrams and photos as needed. Take measurements when appropriate.
- 6.5.6 All accidents involving death, disfigurement, amputation, hospitalization or loss of consciousness for more than 24 hours will be reported to Cal/OSHA immediately.
- 6.5.7 Every investigation must also include an action plan that addresses the question: How can such accidents be prevented in the future?
- 6.5.8 In the event a third party or defective product contributed to the accident, save any evidence as it could be critical to the recovery of claim costs.
 - 6.5.9 Once the accident investigation is complete:
 - Take or recommend corrective action.
 - Document corrective action and submit a copy to Human Resources
 - HR, Department Heads, and the Safety and Emergency Preparedness Coordinator will review the results of all investigations.
 - Consider safety program modifications.
 - Information obtained through accident investigations can be used to update and improve the current program.

6.6 Questions to Ask During an Investigation:

When investigating accidents, open-ended questions such as who, what, when, where why and how will provide more information than any close-ended yes and no questions.

Example: "Were you wearing gloves?" is close ended. "What type of personal protective equipment were you wearing?", is open-ended.

Examples of investigation questions include:

- How did it happen?
- Why did it happen?
- How could it have been prevented?
- Who was involved?
- Who witnessed the incident?
- Where were the witnesses at the time of the incident?
- What was the injured worker doing?
- What was the employee working on?
- When did it happen?
- When was the accident reported?
- Where did it happen?
- Why was the employee assigned to do the job?

The single most important question that must be asked and answered during any investigation is: What do you recommend to prevent this type of accident from happening in the future?

Section 7 EMPLOYEE TRAINING AND INSTRUCTION

7.1 All employees, supervisors, and lead personnel will be trained and instructed on general and job-specific safety and health practices. Training and instructions are provided in the following instances:

- Upon implementation of a new IIPP.
- At time of new employee hire.
- When existing employees are given new job assignments for which training has not previously been provided.
- When new substances, processes, procedures, or equipment are introduced into the workplace and represent a new hazard.
- When anyone is made aware of a new or previously unrecognized hazard.
- When training of supervisors is conducted to familiarize such individuals with health and safety hazards to which employees under their immediate direction and control may be exposed to.
- When training is conducted for employees for the purpose of recognizing specific hazards unique to each employee's job assignment.

7.2 Pitzer College may provide training to employees and supervisors on topics such as but not limited to:

- Accident Prevention Signs & Tags
- Bloodborne Pathogens
- Emergency Action Plan
- Ergonomics
- Fire Extinguishers & Prevention Plan
- Hazard Communication
- Heat Illness Awareness
- Injury Illness Prevention Program
- Occupational Safety & Health Programs
- Employee Access to Medical & Exposure Record / Accident Reporting
- OSHA California Posting Requirements.

7.3 Training shall be conducted in one (or more) of the following methods:

- In-person Safety Training
- Online self-paced Safety Training for a copy of the Training Roster

Section 8 RECORDKEEPING AND EMPLOYEE ACCESS TO MEDICAL RECORDS

8.1 Pitzer employs more than ten (10) employees and complies with Title 8, California Code of Regulations, 3203 (d).

- a. New Employee Safety Orientation Forms Length of employment
- b. Code of Safe Practices Receipt Length of employment
- c. Disciplinary actions for safety Length of employment
- d. Safety inspections 2 years
- e. Safety meeting reports 5 years
- f. Safety Contact Reports 2 years
- g. Accident investigations 5 years
- h. Cal/OSHA log of injuries 5 years
- i. Inventory of Hazardous Materials 30 Years
- j. Employee exposure or medical records 30 years

8.2 An employee's safety and medical records will be made available upon request to the employee, the employee's authorized representatives and appropriate regulatory agencies via a written request to Human Resources.

Section 9 PITZER SAFE PRACTICES

9.1 **General Safety Guidelines**

- a. All persons shall follow the general safety guidelines and conduct their duties by being mindful of the safety of others.
- b. Failure to abide by Safety Guidelines may result in disciplinary action up to and including termination.
- c. Immediately report any unsafe conditions, accidents, injuries or illnesses to your supervisor or Manager.
- d. If employees are unsure of the safe method to do their job, they should STOP and ask their supervisor.
- e. No one shall be knowingly permitted to work while the employee's ability or alertness is impaired by fatigue, illness, prescription medication or over-the-counter drugs. Employees who are suspected of being under the influence of illegal or intoxicating substances or impaired by fatigue or an illness, shall be prohibited from working.
- f. Employees should never work while under the influence of an illegal or intoxicating substance.
- g. Horseplay, scuffling, fighting and other acts that tend to have an adverse influence on the safety or wellbeing of the employees are prohibited.
- h. Working with tools and or machinery shall be planned and supervised to prevent injuries with equipment.
- i. Keep your work area clean, free of debris, electrical cords, and other hazards.
- j. Immediately report and or clean up spilled liquids.
- k. Employees should not operate equipment they are not familiar with. Nor should they attempt to use such equipment until they are fully trained and authorized.
- l. Employees are responsible for ensuring all safety guards are operable and in place prior to using equipment. If the guards are not working, **STOP** working and tell your supervisor.
- m. Employees are prohibited from bringing firearms, weapons, illegal drugs, or alcoholic beverages on campus or other Pitzer job sites.
- n. A red tag system identifies equipment that is NOT to be operated, energized, or used. All tag-out or lock-out notices and procedures must be observed and obeyed.
- o. Do not leave tools, materials, or other objects on the floor that might cause others to trip and fall.
- p. Do not block exits, fire doors, aisles, fire extinguishers, first aid kits, emergency equipment, electrical panels, or traffic lanes. Per OSHA

- standards, there needs to be a minimum of three feet of clearance in front of the panel and a minimum clearance width of 2.5 feet.
- q. Employees shall not enter confined spaces, underground vaults, chambers, tanks, silos, or other similar places that receive little ventilation, unless it has been reported and determined that it is safe to enter.
- r. Employees shall cleanse thoroughly after handling hazardous substances and follow special instructions from authorized sources.
- s. Employees are prohibited from burning, welding, or utilizing any source of ignition near any enclosed tank or vessel, until it has been determined that no possibility of explosion exists, and authority for the work is obtained from the supervisor or manager.

9.2 Fire Prevention and Housekeeping

In case of fire, employees shall consider the safety of themselves and other individuals before saving property.

Smoking is prohibited within twenty (20) feet of where flammable substances are present.

Always take precautions to prevent fires which may be started, particularly from flammable liquids, gasoline, improperly installed electrical equipment, faulty electrical equipment, and trash.

Access to fire extinguishers must always be kept clear. Make note of the location of mobile fire extinguishers equipment in and around your work area.

Maintain awareness of potential hazards when walking about the work areas.

The master copy of this IIPP can be found at Facilities and Campus Services Safety office, Safety and Emergency Preparedness Coordinator (hard copy), internal shared drive (electronic copy). Other copies of the IIPP can be found at:

Pitzer website, www.pitzer.edu



This form is to be completed by employees and returned to their supervisor. This form must reach the department no later than one (1) day after completion for serious unsafe conditions and no more than three (3) days for other unsafe conditions. Conditions which may cause immediate injury should be reported to your supervisor by phone immediately.

Date:		Time:				
Name of Reporting Person:		Position Title:				
Type of unsafe condition	n: (Circle one)					
	Life Threatening	Serious	Minor			
Please describe the loca	ntion:					
List the serial number or ID number of equipment:						
What actions do you recommend for correcting the unsafe condition?						
Received by / Date: ACTION TAKEN BY SUP	Repair PERVISOR TO CORRECT HA	Replacement ZARD/DATE:	Removal			
		,				

IMPORTANT: It is very important to investigate the accident as opposed to the results of the accident. For example, you are not investigating a broken arm, but the factors leading to it. An accident or incident can be a fall, slip, trip, slide, strike against or other contact, being caught in or between, eruption or explosion, burn, or improper movement. Results can range from a simple annoyance to a fatality.

The examples of corrective actions are designed to help you determine some possible actions. It is important that some effective action is taken, including improving management systems and personal performance as management personnel.

WHAT ACTION (\$) CAN PREVENT A RECURRENCE?

(Use this information to help your thought process while attempting to determine all possible contributing factors)

Consider these possible actions, but do not limit yourself. There are numerous possible combinations, and serious thought will be needed to be effective

1.	Contrib	Contributing causes of accidents/incidents				
	a.	a. Supervisory Safety Performance				
		1.	Inadequate or incomplete instruction	Enhance training and follow-up.		
		2.	Safe and healthful work practices not enforced	Stronger and more consistent enforcement		
		3.	Safety not planned as part of job	make safety considerations part of planning any job		
		4.	Infrequent associate safety contacts	Talk about frequently with associates		
		5.	Inadequate or incomplete hazard correction	Document completion of corrections for identified hazards		
		6.	Safety devices not provided	Assure safety devices present and enforce use		
	b. Mental or Emotional Condition of Associate					
		1.	Lack of awareness	Evaluate training tactics		
		2.	Inattention	Find out why		
		3.	Improper altitude lack of (safety cooperation, etc.)	Use behavior modification, incl. discipline if necessary		
		4.	Nervous	Find out why		
	C. Physical Condition of Person					
		1.	Fatigue	Evaluate for personal problems or needed shift adjustment		
		2.	Deafness or poor hearing	Modify job per ADA requirements or evaluate placement		
		3.	Poor eyesight	Modify job per ADA requirements or evaluate placement		
		4.	Associate not physically matched to the job	Modify job per ADA requirements or evaluate placement		
		5.	Physically challenged	Modify job per ADA requirements or evaluate placement		
II.	Immediate cause of accidents/incidents					
	a. Unsafe acts					
		1.	Protective equipment or guard provided, but not used	Evaluate rules and correct training and enforcement tactics		
		2. Poor handling (i.e.: not allowing for sharp or slippery surfaces, poor lifting, etc.)				
		3.	Proper tools/equipment provided, but not used	Evaluate rules and correct training and enforcement tactics		
		4.	Hazardous movement (i.e.: running, jumping, climbing, etc.)	Evaluate rules and correct training and enforcement tactics		
		5.	Horseplay	Evaluate rules and correct training and enforcement tactics		
	b.	b. Unsafe Conditions				
		1.	Absent or ineffective safety device	Determine current requirements and update, if necessary		
		2.	Poor housekeeping	upgrade and enforce housekeeping standards		
		3.	Defective machines, equipment, or tools	Determine current requirements and update, if necessary		
		4.	Improper dress or apparel for the job	Evaluate, upgrade, and enforce safe dress standards		
		5.	Poor illumination, ventilation, etc.	Upgrade and/or repair		