2026-2027
INJURY AND ILLNESS PREVENTION PROGRAM FOR
Columbia Elementary School District

RESPONSIBILITY

The Injury and Illness Prevention Program (IIPP) administrator, Adam Lupis, Maintenance, Operations & Transportation Director has the authority and responsibility for implementing the provisions of this program for Columbia Elementary School District.
All managers, supervisors and lead personnel are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the Program. A copy of this IIPP is available in the District Office, each School Office, and MOT Office.

COMPLIANCE

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Supervisors and lead personnel are expected to enforce the rules fairly and uniformly.
All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.
The following is our system of ensuring that all workers comply with the rules and maintain a safe work environment:

- Informing workers of the provisions of our IIPP;
- Evaluating the safety performance of all workers;
- Recognizing employees who perform safe and healthful work practices. This recognition is accomplished by their supervisor;
- Providing training to workers whose safety performance is deficient;
- Disciplining workers for failure to comply with safe and healthful work practices. The following outlines our disciplinary process:

When it becomes necessary, our district reserves the right to discipline employees who knowingly violate district safety rules or policies. Disciplinary measures will include, but are not limited to:

Verbal warning for minor offenses;
Written warning for more severe or repeated violations.
Suspension without pay, if verbal and written warnings do not prove to be sufficient.

If none of the above measures achieve satisfactory corrective results, and no other acceptable solution can be found, the district will have no choice but to TERMINATE employment for those who continue to jeopardize their own safety and the safety of others.

- Other means that we use to ensure employee compliance with safe and healthful work practices include:

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Managers and superintendent are expected to enforce the rules fairly and uniformly. All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.
Our system of ensuring that all workers comply with the rules and maintain a safe work environment include:

1. Informing workers of the provisions of our IIP Program;
2. Evaluating the safety performance of all workers;
3. Recognizing workers who perform safe and healthful work practices;

4. Providing training to workers whose safety performance is deficient;
5. Disciplining workers for failure to comply with safe and healthful work practices;
Terminating any employee who receives more than two written warnings

COMMUNICATION

The following is our system of communication, designed to facilitate a continuous flow of two-way (management, supervision and employees) safety and health information in a form that is readily understandable to and between all affected site personnel:

- New worker orientation, including a discussion of site-specific safety and health policies and procedures.
- Follow-through by supervision to ensure effectiveness.
- Workplace-specific safety and health training.
- Safety meetings held at least every quarter – more frequently as deemed necessary by the creation of hazards or occurrence of injuries and illnesses.
- Effective communication of safety and health concerns between workers and supervisors, including language translation where appropriate.
- Posted and distributed safety information.
- A system for workers to anonymously inform management about workplace hazards. This is accommodated by:
  Supervisor Hazard Reporting Program - Supervisors will report any unsafe acts or unsafe conditions in writing immediately by submitting a Safety Hazard Notice to the Safety Director. The Safety Director will initiate immediate abatement procedures, either personally or by delegation to one of the Safety Managers.
  Employee Hazard Reporting Program - Employees will also be responsible for reporting any unsafe act or unsafe condition to their supervisor via a written Safety Hazard Notice. The supervisor will then forward the notice on to the Safety Director.
- Vehicle and site-specific codes of safe work practices.
- Other means we use to ensure communication with employees include: It is this district's policy to maintain open communication between management and staff on matters pertaining to safety. All input regarding safety is considered important, and employees are encouraged to actively participate in the district safety program. Employees should feel free to express any safety concerns during safety meetings, individually to supervisors or in writing on the Safety Hazard Notice. All safety suggestions will be given serious consideration and each will receive a response. In turn, the district will provide current safety news and activities, safety reading materials, signs, posters and a bulletin board for easy access to information. Also, regular safety meetings will be held so that all employees have an opportunity to receive safety training and voice personal opinions regarding safety and health matters

Our district elects to use a labor/management safety and health committee meeting all the requirements of T8CCR 3203 (7)(c)(1) – (7) to comply with the communication requirements of subsection (a)(3) of T8CCR 3203.

HAZARD ASSESSMENT

Periodic inspections to identify and evaluate workplace hazards shall be performed by Adam Lupis according to the following schedule:

- When our Injury and Illness Prevention Program was first established;

- At least weekly prior to beginning of the shifts;
- When new substances, processes, procedures or equipment that present potential new hazards are introduced into our workplace;
- When new, previously unidentified hazards are recognized;
- When occupational injuries and illnesses occur;
- When we hire and/or reassign permanent or intermittent workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
- Whenever workplace conditions warrant an inspection.

Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of the attached Hazard Assessment Checklist*, and any other effective methods to identify and evaluate workplace hazards.

ACCIDENT/EXPOSURE INVESTIGATIONS

Investigation of workplace accidents, hazardous substance exposures and near-accidents will be done by accident investigation in a systematic method for collecting factual information that makes it possible to accurately reconstruct the accident and determine the underlying reasons for the cause of the accident. The investigation is fact - finding, not fault finding. Once the primary causes for the accident have been determined, preventative measures can be identified and effectively instituted. Each supervisor has a prominent role in conducting an accident investigation. The responsibility for conducting an accident investigation includes collecting the facts, determining the sequence of events that resulted in the accident, identify action to prevent recurrence, and provide follow - up to ensure that corrective action was effective. All accidents should be investigated promptly regardless of their severity. Promptness of the investigation is essential since conditions at the accident scene change. Moreover, witnesses are more likely to relate circumstances as they were, without the added conjecture that comes late from discussions of the accident with other employees. Promptness in checking the scene assures employees that management is highly concerned for their well-being. The type of investigation depends on the nature and magnitude of the accident. Each department supervisor/manager shall promptly investigate, thoroughly analyze, and report in writing to the District Office all accidents involving personal injury and/or property damage or the potential there for, once they occur. Accident investigation reports shall be submitted within 24 hours of the first notice to the supervisor/manager and will include:

- Visiting the scene as soon as possible;
- Interviewing affected workers and witnesses;
- Examining the workplace for factors associated with the accident/exposure/near-accident;
- Determining the causes of the accident/exposure/near-accident;
- Taking corrective action to prevent the accident/exposure/near-accident from reoccurring; and
- Recording the findings and corrective actions taken on the attached OSHA Form 301.

HAZARD CORRECTION

Unsafe or unhealthy work conditions, practices or procedures at our work facilities shall be corrected **in a timely manner** based on the severity of the hazards, and according to the following procedures:

- When observed or discovered;

- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection; and
- All such actions taken and dates they are completed shall be documented on the attached Identified Hazards and Correction Record*.

TRAINING AND INSTRUCTION

All workers, including management, supervisors, and lead personnel shall have training and instruction on general and job-specific safety and health practices. Training and instruction shall be provided as follows:

- When the IIPP is first established;
- To all new workers;
- To all workers given new job assignments for which training has not previously provided;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever we become aware of a new or previously unrecognized hazard;
- To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and
- To all workers with respect to hazards specific to each employee's job assignment.

This training will include (but is not limited to):

- Explanation of our IIPP, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- Availability of toilet, hand-washing, and drinking water facilities.
- Provisions for medical services and first aid, including emergency procedures.
- Proper housekeeping, such as keeping stairways and aisles clear, work areas neat and orderly, and promptly cleaning up spills.
- Prohibiting horseplay, scuffling, or other acts that adversely influence safety.
- Proper storage to prevent:
    - stacking goods in an unstable manner
    - storing materials and good against doors, exits, for extinguishing equipment and electrical panels.

Where applicable, our training may also include:

- Prevention of musculoskeletal disorders, including proper lifting techniques.
- Use of appropriate clothing, including gloves, footwear, and personal protective equipment.
- Information about chemical hazards to which employees could be exposed and other hazard communication program information.
- Proper food and beverage storage to prevent them from becoming contaminated.

In addition, **we provide specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training**.

RECORDKEEPING

Our district has ten or more employees and keeps records as follows:

1. Records of scheduled and periodic inspections including the person(s) conducting the inspection, the workplace hazards (i.e., unsafe conditions and work practices that have been identified) and the action(s) taken to correct the identified unsafe conditions and work practices, are recorded on the Hazard Assessment Checklist* and the Identified Hazards and Correction Record* and the Investigation/Corrective Action Report*. These records are maintained for at least one (1) year.
2. Documentation of safety and health training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers are recorded on the Worker Training and Instruction Record*. This documentation is maintained for at least one (1) year.