

Manager/Supervisor Risk Management

#131– 2/28/13

A twice weekly e-mail training for YCPARMIA members

TOPIC: SAFETY – IIPP – DOCUMENTATION OF COMPLIANCE

A third required element in an IIPP is a system for record keeping and documentation. It is not enough that you have the right safety practices and do the right thing; you have to be able to document it, on an ongoing basis, to the satisfaction of Cal/OSHA.

Recently one of our members had an unexpected OSHA inspection that was apparently triggered by a call from the member's employees. Following the inspection, the inspector left a standardized printed Cal/OSHA form, the "Document Request Sheet." At the top it states that the employer is required, as part of the Cal/OSHA inspection, to provide copies of specifically requested documents by a specified date, in this case about two weeks after the inspection. It continues that "If the copies are not postmarked/shipped by that date, it will be interpreted as an admission that the documents do not exist, which usually results in Citations and Monetary Penalties."

This paragraph is followed by about 30 lines with check boxes to indicate which documents, depending on the investigative issues, the inspector is requiring. There are a few standard options that specifically address the IIPP including:

- "...IIPP written program with establish/implement date"
- "IIPP inspection records for:"
- "IIPP training records for:"
- "IIPP Injury/Illness Investigative report for:"
- "IIPP safety committee meeting minutes for:"

These types of records generally have to be retained for at least a year. Employers with fewer than ten employees are allowed some relief from the requirement, but the best practice would be to maintain complete records regardless of the employer's size.

The take away from this is that the IIPP is a safety program that requires a number of different kinds of ongoing activities including trainings, inspections, and investigations. Cal/OSHA requires that the employer produce documents and records to evidence that the employer's program is active, and functioning as described in the IIPP. The records need to be specific, and contain dates and individuals involved; they also have to identify the safety issues that were being addressed. The relatively short time window allowed to produce these required records makes ongoing compliance essential.

Looking ahead, the last half of the Cal/OSHA document sheet lists various specific policies like confined spaces, blood borne pathogens, heat illness prevention, and hearing conservation; we will be addressing those topics next month after we finish with the IIPP requirements.

Next Topic: IIPP – Safety Inspections