

**CALIFORNIA  
DEPARTMENT OF FISH AND WILDLIFE**

**Injury and Illness Prevention Program**



**Administration Division  
Organizational Development Branch  
Risk and Operations Management Section**

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## **Series 100: Injury and Illness Prevention Program (IIPP)**

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## **Injury and Illness Prevention Program**

### **Section 101: General Responsibilities**

#### **101.1 Purpose**

To provide the authority, policy, and responsibility for execution of an occupational Health and Safety program to cover all California Department of Fish and Wildlife (CDFW) activities.

#### **101.2 Scope**

The Health and Safety Program includes strategies designed to prevent or minimize incidents and accidents resulting in injury, illness, or death of CDFW employees. Strategies include: written safety plans, employee safety education and training, hazardous waste management, accident prevention and investigation, and the development of safety policies and procedures.

#### **101.3 Policy**

To provide a safe and healthful environment for CDFW staff, to minimize unsafe acts and work-related illnesses through education and training, to identify and correct hazardous conditions, and to make Health and Safety an integral part of every job.

#### **101.4 Responsibilities**

##### **A. Chief, Organizational Development Branch:**

1. Ensure the Department complies with statutory and regulatory requirements in occupational Health and Safety.
2. Establish CDFW goals, policies, standards, and direction for the conduct of the Health and Safety Program.

##### **B. Manager, Risk and Operations Management Section:**

1. Develop, administer, and evaluate CDFW's Health and Safety management program.
2. Appoint Health and Safety staff and ensure appropriate tools and training are provided to them.

##### **C. Risk and Operations Management Section:**

1. Define the Department's Health and Safety Program and execute outlined recommendations.
2. Develop Health and Safety policy and procedures.
3. Promote a safe and healthful workplace for CDFW employees.

4. Work jointly with supervisors and managers to increase employee awareness of workplace hazards and the Health and Safety programs implemented at worksites to mitigate hazards.
5. Keep current with new Health and Safety laws and regulations, and take appropriate action to keep CDFW in compliance.
6. Provide information to staff regarding programs, services, regulatory impact, and compliance requirements.
7. Aid managers, supervisors, and site safety officers in the development of site-specific plans and programs.
8. Assist in the prevention and investigation of accidents.
9. Provide hazardous spill response assistance.
10. Conduct safety training for CDFW management and staff.
11. Furnish additional miscellaneous Health and Safety services upon request.

**D. Deputy Directors/Regional Managers:**

1. Provide administrative oversight of Health and Safety activities within their respective Division or Region.
2. Ensure compliance with all statutory and regulatory requirements in occupational Health and Safety.
3. Appoint Divisional and Regional Safety Officers and ensure appropriate tools and training are provided to them.

**E. Regional/Divisional Safety Officers:**

1. Develop, administer, and evaluate divisional/regional Health and Safety concerns.
2. Serve as the primary Health and Safety advisor to management.
3. Respond to hazards by coordinating the necessary safety expertise, resources, and recommend or initiate corrective action.

**F. Facility/Administrative Section Managers:**

1. Comply with Departmental and Regional Health and Safety program policies and goals.
2. Evaluate Health and Safety program effectiveness at the work location, and initiate actions to correct program deficiencies.
3. Ensure that required or necessary Health and Safety training is provided.
4. Ensure prompt abatement of hazardous conditions or procedures.
5. Appoint and provide training for a Site Safety Officer.

**G. Site Safety Officers:**

1. Report hazards directly to the Facility/Administrative Section Manager.

2. Conduct site inspections at least quarterly and maintain inspection records for at least three years.
3. Recommend regulatory compliance or workplace safety actions to the Risk and Operations Management Section (ROM).
4. Maintain a Safety Bulletin Board at the work site.
5. Maintain Safety Data Sheets and an inventory of chemicals used at the site. These will be readily available to all work site employees.
6. Develop, implement, and maintain safety plans and safety programs required at the site. At a minimum, these will include Injury and Illness Prevention, Hazard Communication, Emergency, Fire Prevention, and Crime Prevention Plans and Programs. These must be readily available to all work site employees.
7. Arrange for safety training specific to the job duty and site needs.

**H. Supervisors (at all levels within the CDFW):**

1. Orient employees to their Health and Safety responsibilities.
2. Evaluate assignments to ensure all aspects of Health and Safety are included. Hazard assessment must be developed for hazardous activities.
3. Ensure employees have no work limitations or restrictions to return to work, either to full duty or with a reasonable accommodation (RA), and are adequately trained to safely accomplish their assigned work.
4. Enforce the proper use of personal protective equipment.
5. Ensure Health and Safety practices are followed by employees and all others in the work area.
6. Ensure unsafe conditions are corrected immediately.
7. Arrange first aid, medical treatment, and/or emergency medical transportation by dialing 9-1-1. Identify a First Aid-Certified employee for each worksite.
8. Investigate and report all accidents.
9. Ensure the initiation, completion, and submission of all required paperwork and forms (Cal/OSHA, workers' compensation, etc.).

**I. Employees:**

1. Follow all Health and Safety policies and procedures required for the task assigned.
2. Maintain a high degree of safety awareness to perform work without accident or incident.
3. Wear personal protective equipment as required.
4. Immediately report all job-related incidents, accidents, illnesses, and injuries to your supervisor, or within your chain of command.
5. Report all unsafe or unhealthful working conditions.

## **101.5 Authority**

Labor Code Section 6401.7(a)(1)

Labor Code Section 6401.7(a)(6)

Labor Code Section 6407

California Code of Regulations, Title 8, Section 3203(a)(2)



# Injury and Illness Prevention Program

## Section 102, Health and Safety Communication

### 102.1 Safety Management

The elements of CDFW's Injury and Illness Prevention Plan and all aspects of its Health and Safety program, must be communicated in an easy-to-understand manner, using written documentation, electronic mail, or through verbal discussion such as safety meetings.

### 102.2 Employees Safety Suggestions/Comments

Reports of unsafe or unhealthful conditions by employees are an important means of identifying potential safety hazards and are encouraged at all levels. Reports must be handled by following the chain of command (supervisor or manager) to expedite corrective action. Reports or complaints may also be made directly to ROM. No employee will suffer retaliation for reporting hazards or potential hazards, or for making suggestions related to safety.

All levels of management will ensure that employees know how to report unsafe working conditions. Emphasis will be placed on personal responsibility for making safety suggestions and reporting hazardous acts and conditions.

- A. Safety Meetings.** All facilities/administrative sections should have quarterly safety meetings with everyone in attendance. Alternatively, a facility/administrative section may choose to have safety on the agenda of regularly scheduled section meetings. During these meetings, safety problems and resolutions, project assignments, status reports, and safety awareness activities will be discussed.
- B. Reporting to Supervisor or Manager.** Reporting Safety Hazard suggestions may be conveyed through written documentation, telephone, or personal contact. Anonymous reports must be in writing and include a sufficient description of the hazard to allow for a thorough investigation.
- C. Grievance or Complaint Process.** An employee who has a Health and Safety concern or complaint must first, and without delay, try to settle the matter through informal discussion with their immediate supervisor. If the employee is not in agreement with the decision reached through these discussions, a formal grievance or complaint may be filed in writing pursuant to the provisions set forth in the appropriate bargaining unit contract.
- D. Reporting Health and Safety Hazards to the Risk and Operation Management Section.** Under normal conditions, submit reports to ROM after addressing comments and complaints through the chain of command. However, any employee may contact ROM directly if they wish to do so.

1. Reports submitted to ROM will be in writing. Typically, reports must be signed; however, anonymous reports must be investigated in the same manner as all other reports.
2. Employees submitting reports who request anonymity must not be revealed to managers or anyone other than those authorized in the California Occupational Safety and Health Administration (Cal/OSHA) regulations (CCR Title 8).
3. **Reports involving imminent danger or loss of life must be made immediately to ROM.** These reports can be made by phone with a follow-up in writing to minimize delays in the investigation. Such reports will be investigated immediately by the work site supervisor or manager.
4. All other reports will be investigated by ROM or personnel under the ROM guidance. A written response will be forwarded to the originator of the report, if known, within ten working days of receipt of the hazard report. If this cannot be accomplished, the originator will be provided with an interim response. When the reported hazard is verified, the reply will indicate the corrective actions taken.

### 102.3 Employer to Employee Communications

- A. **Safety Bulletin Board.** Each facility must have a safety bulletin board. Results of investigations of any employee safety suggestions or reports of hazard must be posted on this bulletin board. Other required postings include: Cal/OSHA Safety and Health Protection on the Job, Emergency Plan, Emergency Telephone Numbers, and the location of the Safety Data Sheets (SDSs). In addition, the Cal/OSHA Form 300A, Annual Summary of Work-Related Injuries and Illnesses, must be posted for 90 days from February 1<sup>st</sup> through April 30<sup>th</sup>.
- B. **Departmental Health and Safety Manual.** This will be readily accessible to employees.
- C. **Site Safety Manual: Site-Specific Plans and Programs.** All plans and programs required for each worksite must be readily accessible to employees.
- D. **Safety Data Sheets.** A binder containing the SDSs for all hazardous chemicals used at the site must be readily accessible to employees.
- E. **Safety Video Library.** A variety of videos on different Health and Safety topics are available to view. Contact the CDFW Office of Training and Development (OTD) for a catalog of videos that may be utilized by CDFW staff.
- F. **Training.** See Section 103 for more information on training.



## **102.4 Safety Committees**

The use of safety committees is one of the most effective means through which hazardous situations with corresponding solutions can be discussed. If you wish to form a Health and Safety Committee at your work location, consult the appropriate collective bargaining agreement and contact ROM for guidance.

## **102.5 Recordkeeping and Retention**

For committees and meetings, a notetaker must be nominated or assigned. The notetaker maintains committee or meeting records and correspondence and keeps meeting notes.

Meeting notes of each committee meeting must be recorded, and retained in a safety committee file. At minimum, meeting notes must be distributed to the Deputy Director/Regional Manager, ROM, and shared with the affected regional/divisional employees.

All safety committee and safety meeting records, as well as other records showing employer/employee communication regarding Health and Safety must be retained for a minimum of five years.

Copies of complaints and suggestions submitted to ROM must be retained five years beyond the calendar year for which they pertain.

## **102.6 Legal Authority**

Title 8, California Code of Regulations, Sections 3200 and 3202.  
Labor Code, Section 6310



# Injury and Illness Prevention Program

## Section 103, Employee Training

### 103.1 Orientation

Supervisors must provide Health and Safety program orientation for employees on the Departmental and Work Site Health and Safety Programs. Before performing any hazardous duties, and within one week of beginning work, supervisors must brief new or transferred employees on policies, rules and regulations, emergency procedures, and any special condition peculiar to his/her working environment. Briefings include:

- A. The Facility/Worksite Environment.** Specific duties as outlined in the Site Safety Program. Examples include: First Aid/CPR, Emergency Evacuation Procedures, Personal Security and Safety, Operation of a Portable Fire Extinguisher, and Ergonomics Training.
- B. Motor Vehicle Operations.** Discuss the following:
  - 1. Authorized vehicle use.
  - 2. Vehicle accident reporting procedures.
  - 3. Vehicle inspection procedures.
  - 4. Defensive driver training and any required road testing.
- C. Accident/Hazard Reporting and Response.** Discuss the following:
  - 1. Responsibility and procedures for reporting accidents, injuries, and illnesses.
  - 2. Procedures for reporting hazardous conditions.

### 103.2 Cal/OSHA Required Training

Many Cal/OSHA standards include employee training as a mandatory compliance element. Any time a standard requires training, the employee's supervisor, manager, and CDFW Health and Safety Committee, must determine which employees are required to be trained. Ensure that these employees attend initial and follow-up trainings, and document their attendance at the training (see Recordkeeping, Section 103.4). Specific training is listed in the Site Safety Program (some examples are stated in Section 103.1). The OTD Supervisor Toolkit is also a reference for Health and Safety mandated training.

There are additional, specialized Cal/OSHA training standards for processes, procedures, and equipment, not commonly used at CDFW facilities. Supervisors and managers may contact the Risk and Operations Management Section to inquire about applicable training requirements beyond what is described in this manual.

### **103.3 Employer Identified Training**

In addition to training required by many Cal/OSHA standards, employees must be trained in the identification of hazards, general safety procedures, and job-specific safe practices at the worksite. Managers and supervisors must also take the training that is provided for their staff so they can recognize hazards and ensure compliance with safe work practices.

Section 105, Hazard Assessment and Control, contains details for identifying hazards at the worksite through inspections and Job Hazard Analysis. Supervisors must conduct and review Job Hazard Analyses and determine the hazards intrinsic to jobs at their worksite. Through the review of the job safety assessment and identification of hazardous tasks, the supervisor can determine appropriate safety protocol and training required for employees to recognize hazards and understand their responsibilities to prevent an unsafe act or working conditions.

### **103.4 Recordkeeping and Retention**

Records must be kept in each employee's personnel records for all formal and informal training, to indicate that the employee has received training, and is qualified to perform a particular type of work. Records must include course title, purpose, instructor, date(s), attendees, and topics covered. Three types of documentation are appropriate:

1. Individual Training Certificate,
2. Training Session Sign-in sheet, and
3. CDFW Office of Training and Development (OTD) Learning Education and Resources Network (LEARN) Training History.

The employer must keep this information for the duration of an employee's employment to show that initial and ongoing training requirements have been met.



# Injury and Illness Prevention Program

## Section 104, Compliance and Incentives

Facility Managers and supervisors are responsible for ensuring that departmental Health and Safety policies and procedures are clearly communicated and understood by all employees. Employees are responsible for using safe work practices, for following all related directives, policies, and procedures, and for assisting in maintaining a safe work environment. The following are methods for ensuring compliance with these objectives.

### 104.1 Promotion and Incentives

A successful Health and Safety program must to be promoted in order to motivate individuals toward achievement of the program's goals. Promotional efforts can be conducted at any organizational level within CDFW. To avoid conflict, safety promotional efforts (incentive programs) and recognition (awards) systems must be coordinated with the Workforce and Strategic Planning (WSP) section of the Organizational Development Branch (ODB). Some examples of permissible activities include the use of posters, banners, medical displays, safety contests, safety lectures, audiovisual techniques, and seminars.

### 104.2 Recognition and Awards

- A. Governor's Employee Safety Award.** Each year, CDFW, through ROM, solicits recommendations for the Governor's Employee Safety Award. Employees who have made an outstanding contribution to employee safety are eligible.
- B. Merit Awards.** Health and Safety accomplishments or suggestions may be included in the Merit Award Program, which is a State-run program that provides monetary awards for employees who submit suggestions that contribute to governmental efficiency.
- C. Departmental Recognition.** Employees who make a significant contribution to the maintenance of a safe workplace, as determined by their supervisor, may receive formal departmental acknowledgement.
- D. Positive Performance Appraisals.** Employees who follow safe and healthful work practices will have this recognized and documented in their performance reviews.

### 104.3 Compliance

Unsafe actions must be corrected or prevented from reoccurring. Employees who are unaware of correct Health and Safety procedures will be trained or retrained as necessary to ensure compliance. When unsafe actions continue, corrective steps, including formal adverse action, may be taken by the appropriate supervisor. Employee

performance appraisals may include a review of the employee's effectiveness in following good practices of vehicle and personal safety.

#### **104.4 Recordkeeping and Retention**

Records must be kept of incentives offered, recognition and awards granted, and corrective actions taken. These records must be retained for a minimum of five years beyond the calendar year for which they pertain.



# Injury and Illness Prevention Program

## Section 105, Hazard Identification

### 105.1 Background

Built into the Injury and Illness Prevention Program are procedures identifying, evaluating and correcting work place hazards that may create an unsafe employee work environment.

### 105.2 Cal/OSHA

Cal/OSHA Regulations exist to prevent and control identified hazards.

### 105.3 CDFW Risk and Operations Management Section

Through the CDFW Health and Safety Manual, ROM communicates Cal/OSHA regulations as they apply to CDFW, as well as specific hazards identified that are significant to departmental operations.

### 105.4 Safety Inspections

All CDFW staff are encouraged to continuously identify and correct hazardous conditions and practices; however, certain situations require formal evaluation and documentation. Each manager and supervisor must ensure that safety inspections are conducted **at least annually** to identify unsafe conditions and work practices. Facilities and operations having special hazards must be inspected more frequently (**at least quarterly**) as required by regulation or as determined by the Site Manager or ROM.

Hazards and deficiencies identified during an accident investigation (see Section 107, Injury and Illness Investigation, for additional details) that cannot be immediately corrected, must be treated the same as those noted during safety inspections.

#### A. Schedule

Periodic inspections must be performed:

1. Annually,
2. When new substances, processes, procedures, or equipment that present new hazards are introduced to the workplace,
3. When new, previously unidentified hazards are identified,
4. When an occupational injury, illness, or near miss occurs,
5. When workers are hired or reassigned to processes, operations, or tasks which a hazard evaluation has not previously been conducted, and
6. Whenever workplace conditions warrant an inspection.

## **B. Personnel**

1. Safety inspections will be conducted by CDFW personnel qualified by training, or experienced with identifying hazards. Inspections by CDFW personnel must note the need for additional inspections by technical experts such as the Fire Marshal for fire control arrangements or the California Highway Patrol for security issues.
2. Safety inspections conducted by ROM, may be conducted with or without prior notice. However, inspections will usually be coordinated with the Site Safety Officer.
3. The person conducting the safety inspection must consult with various site personnel and offer them an opportunity to identify unsafe or unhealthy working conditions.

## **C. Conducting Inspections**

Safety inspections consist of using checklists, hazard reports, and/or any other methods to identify and evaluate workplace hazards. The following are general guidelines for conducting safety inspections:

1. Use a checklist until proficient at identifying hazards. Review the checklist before the inspection begins. Sample checklists are available through ROM.
2. Inspect the entire work area or facility.
3. Prepare an inspection sequence and inspect one area at a time.
4. Have someone familiar with the work area or facility accompany the inspector to answer questions that may arise during the inspection.
5. Ask affected employees who work in the area for input during the inspection. Try to resolve questions during the inspection rather than going back to inspect a second time.
6. Focus the inspection on unsafe work practices and unsafe conditions.
7. Write a Report of Hazards and forward to ROM, documenting:
  - a. A listing of hazards/deficiencies found.
  - b. A statement specifying whether the hazard(s) constitutes an immediate threat of death or serious injury.
  - c. A statement of the circumstances under which the hazards surfaced (e.g. an employee report or a safety inspection).
  - d. Action recommended by the inspector for abatement of the hazard.

### **105.5 Job Hazard Analysis**

A Job Hazard Analysis is a process by which hazards and safety measures for each task employees perform are identified. Once the task steps are listed, an analysis is undertaken in order to determine the safest, most efficient manner to perform the task.

The purpose for a Job Hazard Analysis is to prevent accidents, evaluate procedures, designs, processes and facilities, in order to eliminate or control unacceptable risks. An analysis is a fundamental tool for developing safety plans and operations, particularly when new tasks or duties are assumed at a work site, when a new employee is hired into a job recognized as high risk, or when an employee returns to work following an injury.

While a Job Hazard Analysis may seem complex and time consuming, it is possible to conduct an effective analysis in a short period of time if task descriptions are kept simple. Please refer to the sample analysis in the Appendix. Further details are included in the specific Site Safety Plan for each facility.

### **105.6 Employee Reports**

Reports of unsafe or unhealthful conditions by employees are an important means of identifying potential hazards before accidents occur, and are encouraged at all levels. See Section 102.2, Employee Safety Suggestions/Comments, for complete procedures on addressing employee suggestions and comments.

### **105.7 Accidents, Injuries, and Illnesses**

Accidents, injuries, and illnesses are often preventable and are often indicative of unsafe acts or unsafe conditions that may have been prevented. Anytime a supervisor receives a Standard Form 270, Report of Vehicle Accident; Form DFW 300, Report of Minor Incident; or, SCIF Form 3301, Employee's Claim for Workers' Compensation Benefits; he/she will identify the hazard(s) that contributed to the accident, injury, or illness, and take the necessary steps to prevent or correct its recurrence. For information on reporting practices on the above forms, refer to the CDFW Intranet Health and Safety and Workers' Compensation/RTW procedures.

### **105.8 Recordkeeping and Retention**

All records pertaining to hazard assessment must be maintained for a minimum of five years beyond the calendar year for which they pertain. These records include:

- A. Records of inspections.** The person(s) conducting the inspection, date of inspection, unsafe conditions and work practices identified, and action taken to correct the unsafe conditions and work practices.
- B. Hazard log.** Conditions discovered through less formal means (i.e. employee verbally notifying supervisor of hazard) must be noted in a hazard log which will include the date, a description of unsafe conditions or work practices identified, and the remedial action taken to correct the unsafe conditions or work practices.
- C. Job Hazard Analysis. (See Section 105.5)**
- D. Employee Reports of Unsafe or Unhealthful Conditions.**



**E. Accident, Injury, and Illness Reports.** STD 270, Report of Vehicle Accident; Form DFW 300, Report of Minor Incident; or SCIF Form 3301, Employee's Claim for Workers' Compensation Benefits.

**105.9 Legal Authority**

Title 8, California Code of Regulations, Section 3203(a)(4).



# Injury and Illness Prevention Program

## Section 106, Hazard Control

### 106.1 Controlling Hazards

It is the intent of the CDFW to eliminate all hazards and unsafe work conditions or work practices. All identified hazards (See Section 105, Hazard Identification, for additional information) must be corrected immediately. If immediate correction is not possible, the hazard must be safeguarded by prohibiting employee access to the area or equipment. Highest priority will be given to severe and imminent hazards.

- A. *Important:* When an imminent danger situation is discovered which may result in loss of life, the supervisor, Facility/Administrative Section manager, and ROM must be immediately notified. The supervisor will correct the condition or remove personnel from exposure. If the hazard cannot be abated, adequate interim measures to prevent employee exposure must be developed. Employees will not enter an imminent hazard area without appropriate personal protective equipment, training, and prior supervisory approval.**
- B.** Upon completion of any inspection or any other method of hazard identification, the Facility/Administrative Section manager or designee must be apprised of all violations so that corrective action may be initiated immediately.
- C.** If the hazard cannot be rectified immediately, the supervisor will post a warning notice for employees and inform supervisors of other work sections that may be affected by the unsafe or unhealthy condition.
- D.** If ROM conducts a hazard identification survey, ROM will send a report to the manager of the inspected facility within 30 calendar days. These reports will cite hazards, deficiencies, and recommended corrective actions.
- E.** If hazards and deficiencies cannot be corrected within 30 calendar days from the date of discovery, an abatement plan must be completed by the site manager. Hazard Abatement plans must contain the following components:
  - 1.** A reason for the delay in eliminating the hazard.
  - 2.** A proposed timetable for hazard elimination.
  - 3.** An explanation of the interim steps taken to provide temporary worker protection.

The report of identified hazards as well as any resulting abatement plan must be posted on the Safety Bulletin Board for the facility, and discussed at the next safety meeting.

## 106.2 Hazard Corrective Measures

Whenever hazards are discovered, control measures must be addressed. The supervisor must evaluate and document whether to employ any or all of the following remedies, in priority order:

- A. Engineering Controls:** These are devices or physical modifications to equipment or structures. Engineering controls must be implemented as the primary control measure, where relevant. Some examples include machine guarding, guardrails, interlock devices, safety switches, fans to reduce airborne contamination of harmful chemicals, curtains, room dividers, or acoustic tiles to reduce sound levels.
- B. Administrative Controls:** These include written procedures and/or safe work practices, training, changes in work schedules, assignments, or duties, limiting worker exposure, measuring performance, housekeeping, and maintenance. Written procedures and safe work practices are always required when an employee is conducting any activity that has the reasonable potential to cause injury.
- C. Personal Protective Equipment (PPE):** Includes clothing, hand and arm protection, body and leg protection, foot protection, head protection, eye and face protection, hearing protection, respiratory protection, electrical protection, and fall protection. The use of PPE does not eliminate the need for engineering or administrative controls. Some or all of these measures may be necessary depending on the specific hazard identified.

To summarize:

1. Identify the hazard,
2. Conduct a hazard assessment including determining engineering, administrative, and PPE controls needed,
3. Establish appropriate engineering controls,
4. Develop written procedures and safe work practices, and
5. If administrative and engineering controls *do not* reasonably control the hazard, then use PPE.

## 106.3 Record Keeping and Retention

All records pertaining to hazard control must be maintained for a minimum of five years beyond the calendar year for which they pertain. These records must include:

- A.** Hazard Abatement Plans.
- B.** Written Reports of Corrective Actions.



## Injury and Illness Prevention Program

### Section 107, Accident, Injury, and Illness Investigations

#### 107.1 Policy and Purpose

Supervisors will investigate and document every occupational accident, injury, or illness in a timely manner to identify contributing factors that will prevent reoccurrences. The purpose is to establish the facts and sequence of events related to the accident, determine the contributing causes of the accident, and identify ways to prevent a recurrence of the accident in any CDFW operation (see Section 105, Hazard Identification, for additional details). Thorough investigation of all injuries and illnesses, accidents, and even near misses helps identify and evaluate workplace hazards by determining why they occur, where they happen, and by highlighting any trends.

**Important:** *Work-related fatalities and serious injuries or illnesses must be reported immediately (within eight hours) to the CDFW Risk and Operations Management Section (ROM) at 916-928-7692; and the nearest office of the Department of Industrial Relations (DIR), Division of Occupational Safety and Health. District Office Phone Numbers list: <http://www.dir.ca.gov/DOSH/DistrictOffices.htm> (DIR Public Information Office: 415-703-5070). "Serious injury or illness" includes amputation of any member of the body, serious permanent disfigurement, or hospitalization for over 24 hours (for other than medical observation).*

#### 107.2 Responsibilities

- A. First-Line Supervisor** – The first-line supervisor is responsible for conducting an injury or illness investigation, and preparing its related reports.
- B. Second-Line Supervisor** – The second-line supervisor will review the findings of the first-line supervisor. This review also ensures that first-line supervisors are conducting injury and illness investigations.
- C. The Risk and Operations Management Section (ROM)** – ROM is available to advise and/or assist in the investigative effort. The safety staff have specialized training and experience that enables them to search for all the facts, apparent and hidden, and can gather information that can be used to prevent a similar accident. ROM can help identify violations of policy and law, and assist in suggesting corrective measures.

### 107.3 Conducting the Investigation

The investigation must be performed with the objective of finding out what caused the injury, illness, or accident, and how it can be prevented in the future. Take photographs and draw diagrams of the accident scene if prudent and appropriate. Interview any injured employee or witness and carefully examine the area where the incident occurred. The following questions, if adequately answered, will result in an effective investigation:

- A. What happened?** The investigation will determine what took place to cause the incident, what was the resulting injury or illness, and what was the extent to which any property damage occurred;
- B. Why did the incident happen?** The investigator will obtain all facts surrounding the injury or exposure: What caused the situation to occur? Who was involved? Was the employee qualified to perform the assignment involved? Was the employee properly trained? Were safe work practices established for the task and were they followed? Where else in the workplace does a similar situation exist?; and
- C. What should be done to eliminate the hazard?** The investigator must determine whether the accident was preventable, and what can be done to eliminate the hazardous condition or work practice. The purpose is ***fact finding, not fault finding***. Avoid establishing blame and instead determine what constructive action can eliminate the cause of the injury or illness. For example, would new safe work practices, retraining, or changing a piece of equipment prevent recurrence? (See Section 106, Hazard Control, for additional guidelines).

### 107.4 Recordkeeping and Retention

The STD 274, State Driver Accident Review; SCIF Form 3067, Employer's Report of Occupational Injury or Illness; SCIF Form 3301, Employees Claim Form; Cal/OSHA Form 300, Log of Work-Related Injuries and Illnesses; Form DFW 300, Report of Minor Incident; and Cal/OSHA Form 301, Injury and Illness Incident Report are used to meet the documentation requirement as relevant. If the accident is a complicated one, provide additional detail in an attached narrative report. These reports must be maintained for a minimum of five years beyond the date for which they pertain.

If an illness is associated with exposure to a toxic substance or harmful physical agent, the investigation records must be retained for the duration of the affected employees' employment, plus 30 years. Also, submit copies of all exposure documentation to the Human Resources Branch, Workers' Compensation Unit. When the employee leaves CDFW through retirement, transfers to another State agency, or separates from State service, send all exposure records to the departmental Human Resources Branch, Workers' Compensation Unit for retention.



## Injury and Illness Prevention Program

### Section 108, Injury and Illness Reporting and Recordkeeping

#### 108.1 Recordable Injuries and Illnesses

The California Occupational and Health Administration (Cal/OSHA) requires reporting and recording of many work-related injuries and illnesses (Title 8, California Code of Regulations, Sections 14300-14300.48). Employers are required to use the Cal/OSHA Form 300 (Log of Work-Related Injuries and Illnesses). The Department's Workers' Compensation (WC) Analyst will complete this log for each establishment or site. Once completed, the WC Analyst will send the log to the establishment or site. The location's manager/supervisor will post this log on the Safety Bulletin Board so that all employees are aware of the injuries and illnesses occurring at their worksite. **Recordable** injuries and illnesses are those that result in:

- A. Death
- B. Loss of consciousness
- C. Days away from work
- D. Medical removal cases
- E. Restricted work or temporary transfer to another job
- F. Medical treatment beyond first aid
- G. A significant injury or illness diagnosed by a physician or health care provider (e.g. – fractured or cracked bones, cancer, chronic irreversible disease, punctured eardrums, hearing loss in one or both ears)
- H. Needle sticks and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material (e.g. – blood, body fluids)
- I. Tuberculosis

**Important:** *Work-related fatalities and serious injuries or illnesses must be reported immediately (within eight hours) to the CDFW Risk and Operations Management Section (ROM) at 916-928-7692; and the nearest office of the Department of Industrial Relations (DIR), Division of Occupational Safety and Health. District Office Phone Numbers list: <http://www.dir.ca.gov/DOSH/DistrictOffices.htm> (DIR Public Information Office: 415-703-5070). "Serious injury or illness" includes amputation of any member of the body, serious permanent disfigurement, or hospitalization for over 24 hours (for other than medical observation).*

#### 108.2 Forms and Distribution

In the event of a recordable injury or illness, the following procedures must be completed and/or submitted **within five calendar days of the incident** by the designated facility or administrative Section:

- A. Cal/OSHA Form 300, Log of Work-Related Injuries and Illnesses:** Update the original form as injuries occur and maintain it at the worksite. See Section 108.4 below for additional information.
- B. Cal/OSHA Form 301, Injury and Illness Incident Report:** Maintain the original form at the worksite and submit a copy to the CDFW Workers' Compensation Analyst following each recordable incident.
- C. SCIF Form 3067, Employer's Report of Occupational Injury or Illness:** Maintain a copy at the worksite, distribute the original to the State Compensation Insurance Fund, and submit a copy to the CDFW Workers' Compensation Analyst.

### **108.3 Annual Summary Posting**

The Cal/OSHA Form 300A, Annual Summary of Work-Related Injuries and Illnesses, must be completed at the end of the calendar year for which it pertains, with a copy provided to the CDFW Workers' Compensation Analyst. Additionally, the highest ranking officer at the facility is required to sign the Cal/OSHA Form 300 before posting. This Annual Summary must be conspicuously posted on the facility's Health and Safety Bulletin Board from February 1<sup>st</sup> through April 30<sup>th</sup> following the year for which the data pertain.

### **108.4 Privacy Cases (Cal/OSHA Form 300)**

When completing the Cal/OSHA Form 300, there are certain situations where the employer cannot put the employee's name on the form for privacy reasons. In those circumstances, the words "privacy case" must be entered in the space normally used for the employee's name. The employer must keep a separate, confidential list of claim numbers and employee names for these cases so they can be updated and so that information can be provided to government representatives upon request. The following types of injuries or illnesses are considered to be privacy cases:

- A.** An injury or illness to an intimate body part or the reproductive system;
- B.** An injury or illness resulting from a sexual assault;
- C.** Mental illnesses;
- D.** HIV infection, hepatitis, or tuberculosis;
- E.** Needle stick injuries or cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material; and
- F.** Other illnesses, if the employee independently and voluntarily requests that his or her name not be entered on the log.

### **108.5 Recordkeeping and Retention**

The Cal/OSHA Forms 300, 300A, 301, and, SCIF Form 3067 must be retained for a minimum period of five calendar years following the calendar year for which they pertain.

### **A. Providing Records to Government Representatives**

When requested by authorized government representatives, including Cal/OSHA, CDFW must provide access to original recordkeeping documents (plus one free set of copies) within four business hours of a request.

### **B. Employee Requests for Records**

CDFW must provide copies of current or stored Cal/OSHA 300, 300A, or 301 Forms when requested by employees, former employees, personal representatives, or authorized representatives for an establishment *the employee worked in* if it describes an injury or illness to that employee by the end of the next business day.

CDFW must provide copies of the Cal/OSHA Form 301, Injury and Illness Incident Report (or equivalent), when requested by an authorized employee representative for an establishment *where the agent represents employees* under a collective bargaining agreement:

1. within seven calendar days.
2. with certain personally identifying information deleted including:
  - a. employee name; address; date of birth; date of hire; gender;
  - b. physician name; location where treatment was provided;
  - c. whether treatment occurred in an emergency room; and
  - d. whether employee was hospitalized overnight as an in-patient

## **108.6 Legal Authority**

California Code of Regulations, Title 8, Section 14300 – 14300.48





## Injury and Illness Prevention Program

### Section 109, Cal/OSHA Work Site Inspections and Reporting Serious Accident Responsibilities

#### 109.1 Background/Purpose

The California Department of Industrial Relations (DIR), Division of Occupational Safety and Health (Cal/OSHA) inspects workplaces to ensure that employers provide workplaces free from occupational Health and Safety hazards. If Cal/OSHA discovers violations, they may issue citations and/or impose monetary penalties. When Cal/OSHA conducts surprise inspections of CDFW facilities, CDFW's policy is to cooperate fully with inspectors.

Cal/OSHA inspects for these types of investigations:

- A. *Imminent dangers* - Any conditions or practices that can reasonably be expected to cause death or serious physical harm to employees immediately or before remedial action must be taken.
- B. *Accidents* - Resulting from a reported fatality, catastrophe, or serious injury or illness including dismemberment, permanent disfigurement, or hospitalization in excess of 24 hours. These must be reported to Cal/OSHA within eight hours.
- C. *Complaints* - Referrals and complaints made by employees.

See <https://www.dir.ca.gov/DOSHPol/P&pc-1A.pdf> for Cal/OSHA's Inspection Policy and Procedures, or contact ROM.

#### 109.2 Work Site Inspections and Serious Accident Reporting Responsibilities

If a serious accident occurs (one that results in fatality, catastrophe, or serious injury or illness including dismemberment, permanent disfigurement, or hospitalization in excess of 24 hours), the site manager must:

- A. Report it directly to Cal/OSHA as soon as possible (the law requires that we report it within eight hours). DIR District Office phone numbers are on the internet: <http://www.dir.ca.gov/DOSH/DistrictOffices.htm>; DIR Public Information Office Phone Number: 415-703-5070.
- B. Prior to reporting the accident to Cal/OSHA, immediately notify CDFW's ROM, via telephone at 916-928-7692. If a Cal/OSHA inspector arrives at a CDFW facility to inspect it, the manager/supervisor or highest ranking employee at the facility at that time is responsible to:
  - 1. Accompany the inspector during the inspection and take pictures and notes, particularly of issues noted by the inspector.
  - 2. Be cordial, but do not volunteer extra information to the inspector.

3. If the inspector asks to see any records, make them immediately available.
4. Fix any problems noted by the inspector as soon as possible. If it is possible to remedy an identified problem or violation immediately, do so.
5. Notify CDFW's ROM immediately after the inspection. CDFW has ten days to remedy any violations, which can result in having fines waived or lowered. CDFW may also choose to appeal the violation.

### **109.3 What happens when a Cal/OSHA inspector arrives unexpectedly**

Even with unexpected visits, Cal/OSHA must conduct workplace inspections at a reasonable time, generally during the employer's normal work hours, and in a reasonable and courteous manner.

The Cal/OSHA inspector will want to meet with the highest CDFW employee available on site. The inspector will explain the reason for and scope of the inspection, and ask to review records.

Next, the inspector will conduct a "walk around" of the facility. The highest ranking manager available should accompany the Cal/OSHA inspector on this tour, and is entitled to do so. The inspector may take photographs, use sampling devices, and/or interview employees privately during the course of the inspection. You may choose to take your own notes and photographs, as appropriate. If a workplace inspection reveals alleged violations of Health and Safety regulations, Cal/OSHA will issue a citation. The citation will show the violation and penalties, set a time for correction of the condition, and outline the procedure for contesting the charges. At the conclusion of the inspection, the inspector will verbally discuss any alleged violations observed and the requirements for abatement.

### **109.4 What to do when a Cal/OSHA inspector issues a citation**

Contact ROM immediately for assistance correcting the violations, negotiating with Cal/OSHA to have the citation or penalties amended or withdrawn, or appealing the violation and fax a copy of the citation. CDFW has ten days to respond to the citations, so time is of the essence.

### **109.5 Legal Authority**

California Labor Code Sections 6307, 6309, 6313, 6314, 6314.1, 6320, 6321, 6322, 6324, 6325, 6429(c) and 7953.



**JOB HAZARD ANALYSIS**  
California Department of Fish and Wildlife

**Job Activity:** Lawnmower Operations

**Personal Protective Equipment Required:**

Gloves, goggles, hearing protection, steel toe safety footwear.

**Qualifications, Experience, or Training Required:**

Experience and/or training in the use of tools and equipment.

BASIC JOB STEPS	HAZARDS	SAFE JOB PROCEDURE
<p>I. Prepare mower for operation.</p> <p>II. Check fuel level.</p>	<p>A. Cuts to hands during examination of the blade.</p> <p>B. Exposure to gasoline fumes. Possible ignition of gasoline fumes.</p>	<ol style="list-style-type: none"> <li>1. Examine the mower to ensure all protective shields are in place. Do not operate the mower until such shields are in place. Wear work gloves when examining the blade. (A, C, D)</li> <li>2. Store gasoline in approved containers. (B)</li> <li>3. Handle oil and gasoline outside of buildings. (B)</li> <li>4. Fuel lawnmower outdoors. If the mower has been running, allow the engine to cool before refueling. (B)</li> <li>5. Immediately wipe up all spills. (B)</li> <li>6. Ensure a suitable fire extinguisher is located near gasoline storage areas or where filling takes place. (B)</li> </ol>

**SAMPLE**

BASIC JOB STEPS	HAZARDS	SAFE JOB PROCEDURE
<p>III. Start the lawnmower engine.</p> <p>IV. Lawn mowing.</p>	<p>C. Feet may contact the blade. Possibility of slips and/or falls.</p> <p>D. Operator being struck by debris. Bystanders being struck by debris. Blade can become bent or broken.</p> <p>E. Operator suffering heat stress/illness.</p> <p>F. Operator getting sunburned.</p>	<p>7. Keep feet outside of protective shields. Place one foot on mower as a brace. Pull starting cord without jerking the cord. (C)</p> <p>8. Survey the area to be mowed before mowing operations begin. Remove noticeable debris. Do not operate mowers over irregular surfaces, fixed objects, curbs, etc. (D)</p> <p>9. Drink plenty of water. Take breaks in cooler areas such as in the shade or indoors. (E)</p> <p>10. Apply sunscreen prior to mowing. Wear a hat. (F)</p>

SAMPLE



***JOB HAZARD ANALYSIS***  
California Department of Fish and Wildlife

**Job Activity:**

**Personal Protective Equipment Required:**

**Qualifications, Experience, or Training Required:**

**BASIC JOB STEPS**

**HAZARDS**

**SAFE JOB PROCEDURE**