



ADDING A DASH OF PPE INTO YOUR IIPP: A California Employer's Recipe For Employee Health And Safety

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I am amazed at how often business owners are surprised to learn that all employers in California are required to prepare, implement and inform employees about the employer's Injury and Illness Prevention Program (IIPP). Are small employers exempted? No. Are start-up employers exempted? No. All employers in California are required to have an IIPP¹.

What's an IIPP? It is a written workplace safety program designed to improve employee safety and health and reduce injury and illness. According to the CA Department of Industrial Relations (the DIR), the 8 required elements of an IIPP are:

- Responsibility
- Compliance
- Communication
- Hazard Assessment
- Accident/Exposure Investigation
- Hazard Correction
- Training and Instruction
- Recordkeeping

The bad news: There is no pre-printed cookie-cutter formula that every employer can just download and implement and call it a day. Rather, creating an IIPP requires a highly individualized assessment, and periodic reassessment, of the actual workplace and the potential health and safety it holds for the employees.

The good news: Employers have a place to start. Specifically, the DIR provides a free tool to help employers design a customized IIPP appropriate to a specific workplace as well as a sample template to fill in once the program has been designed.

The IIPP cannot be a static one-time document. It must evolve and reflect actual business circumstances. For example, when a physical workplace changes, the IIPP needs to be revisited. To be effective, and compliant, an IIPP must:

- Fully involve all employees, supervisors, and management
- Identify the specific workplace hazards employees are exposed to
- Correct identified hazards in an appropriate and timely manner
- Provide effective training

So what's an employer to do when something significant and pervasive like COVID-19 happens? The DIR recommends that employers assess COVID-related health hazards in the workplace and update their IIPPs to implement infection prevention measures.

The current news: The first step is to assess the workplace and determine where the risk of COVID-19 exposure falls on OSHA's [hazard recognition pyramid](#). Once that's done, current OSHA guidelines recommend that employers revisit and update their IIPP's to include recommendations from the Centers for Disease Control and Prevention (CDC), [Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 \(COVID-19\)](#), and [Coronavirus Disease 2019 \(COVID-19\): How to Protect Yourself & Others](#). Current best [practices](#) applicable to all workplaces include:

- Frequent hand-washing with soap and water for at least 20 seconds.

¹Well, some are exempted. <https://www.dir.ca.gov/dosh/etools/09-031/exceptions.htm>

- Avoiding touching eyes, nose, or mouth with unwashed hands.
- Practicing good respiratory etiquette, including covering coughs and sneezes. PPE, anyone?
- Avoiding close contact with people who are sick.
- Staying home when sick.
- Recognizing personal risk factors for increased danger from exposure.

When the new normal means that the workplace is an employee's own home, house-boat, or remote coffee shop, does the IIPP apply? Indeed. Remote workers are to be addressed in and protected by the IIPP.

If COVID-19 is not incentive enough to prepare, or make current, an IIPP for your business, consider the fact that OSHA has proposed a new rule for 2021 that would require employers to provide employees with a copy of the written IIPP within five days of asking. That's incentive, right?



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