

## **HOW DO I GET A REQUIRED WRITTEN PROGRAM?**

Many regulatory agencies such as OSHA, EPA, State and Local governments require written safety, health and environmental programs.

For example, California requires written programs under CAL OSHA regulations:

- Injury & Illness Prevention Program (IIPP) (All employers)
- Code of Safe Practices (Construction)
- Heat Illness Prevention (Outdoor employment)
- Medical and First aid Program (Construction)
- Hazard Communication Program (If using Hazardous materials/chemicals)
- Emergency Action Plan (All employers)
- Bloodborne Pathogens Program (Except construction)
- Lockout/tagout procedures (If applicable)
- Respiratory Protection Program (If respirators are used.)

What is the easiest way to comply with these requirements? What are my options?

Options increase in range of cost:

1. **Do nothing.** This is not recommended and exposes the employer to potentially costly fines and expensive litigation.
2. **Write programs yourself.** The cost is low and the customization is high. However, many employers don't have the time or resources to tackle writing a safety, health and environmental program.
3. **Use sample programs.** Regulatory agencies or insurance companies may provide sample written programs. These are often a good starting point if you choose to write your own program.
4. **Buy an inexpensive "fill in the blanks" program.** The main benefit of fill in the blanks programs, readily available on the Internet or from trade organizations, is low cost. The disadvantage is that they are rarely customized to the operations and often too long. Programs that are not edited for the actual hazard exposure may create legal liability.
5. **Customized programs** such as those done by Dave Smith & Co. A Customized Safety program includes an IIPP based on an onsite hazard assessment, customization and inclusion of all written programs required by applicable regulations. Electronic versions for future editing are provided.

**Remember, written programs are discoverable in legal proceedings. Written programs are binding legal documents. Make sure you do what you say you will do!**