Risk Reduction Program Reviews

Every fiscal year, your district risk reduction programs are reviewed based on compliance and best practice standards. We recently revised our questions and point values for our annual audit reviews to provide a better understanding of why we developed these reviews for our Trust members. These programs were developed as a risk reduction platform that includes areas where member districts can reduce their exposure to risk, reduce on-the-job injuries, and meet the requirements for compliance. These areas are safety committees, hearing protection-audiograms, physical capacity assessments, return-to-work, indoor air quality, and science lab safety.

Each program has an annual or biennial (every other year) audit review to inform our district partners of how well they are doing and what we can do together to improve their results to reduce their overall risk. We feel it is important to let our districts know when they are and are not meeting compliance standards and best practices for these programs because it is everyone’s best interest to do so. Many programs are fully funded and managed by the Trust to reduce the burden of costs and barriers to implementation.

The following audit questions briefly explain their importance and the questions/point values for each question. We have also delineated the compliance standards and best practices on those questions to better inform our members.

We appreciate your continued participation and partnership. Trust programs and associated audits are developed as part of an entire risk management platform centering on areas where our district members can reduce their exposure to risk, decrease on-the-job injuries, and contain costs related to those injuries. The primary areas of focus include Safety Committees, Onsite Audiograms, Physical Ability Evaluations, Science Laboratory Safety, Indoor Air Quality, and Return-to-Work.
SAFETY COMMITTEE AUDIT REVIEW

A Safety Committee is an important part of your district’s accident prevention and safety program and a great first step towards providing a workplace environment that is safe for employees and the public. Safety Committees help member districts reduce the frequency and severity of accidental injuries and promote safety and health among employees, students, and visitors.

Therefore, the purpose of a Safety Committee Audit Review is to offer guidance and support to our member districts in their efforts to support safe environments for their employees and to lower the frequency and severity of accidents and injuries.

Below are the current Safety Committee Audit Review questions:

<table>
<thead>
<tr>
<th>Safety Committee Audit Questions</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Does your district conduct employee safety committee meetings? (WAC 296-800-13020)</td>
<td>15</td>
</tr>
<tr>
<td>2. How often does your committee meet? Minimum quarterly. (Best Practice)</td>
<td>15</td>
</tr>
<tr>
<td>3. Does the committee review all accident/incident reports for trends and corrective actions and report findings to the department director or supervisor with recommendations for reducing exposures through departmental training, awareness, etc.? (WAC 296-800-13020)</td>
<td>15</td>
</tr>
<tr>
<td>4. Does the committee follow-up all accident/incident reports for corrective actions at the next meeting? (WAC 296-800-13020)</td>
<td>10</td>
</tr>
<tr>
<td>5. Is there an agenda prepared for each meeting? (Best Practice)</td>
<td>5</td>
</tr>
<tr>
<td>6. Are minutes prepared for each meeting? (WAC 296-800-13020)</td>
<td>5</td>
</tr>
<tr>
<td>7. Do you have an elected Chairperson? (WAC 296-800-13020)</td>
<td>5</td>
</tr>
<tr>
<td>8. Do you have employee elected members? (WAC 296-800-13020)</td>
<td>5</td>
</tr>
<tr>
<td>9. Do you have employer selected members? (WAC 296-800-13020)</td>
<td>5</td>
</tr>
<tr>
<td>10. Does the safety committee monitor, maintain, and update the district safety bulletin boards at all sites? (WAC 296-800-19005)</td>
<td>5</td>
</tr>
<tr>
<td>11. Are you conducting facility and/or premises inspections to identify and correct unsafe conditions before they create an incident? (WAC 296-126-094)</td>
<td>5</td>
</tr>
<tr>
<td>12. Does the safety committee review and update the districts accident prevention program (APP) and ensure this document is located at all district sites? (WAC 296-800-13020)</td>
<td>5</td>
</tr>
<tr>
<td>13. Does the district have site-based safety committees at each location that has 11 or more employees? (WAC 296-800-13020)</td>
<td>5</td>
</tr>
</tbody>
</table>

Loss Control Contacts

<table>
<thead>
<tr>
<th>Jessica Guy</th>
<th><a href="mailto:jguy@pswctup.org">jguy@pswctup.org</a></th>
<th>PH 425-917-7645</th>
</tr>
</thead>
<tbody>
<tr>
<td>Steve Lyons</td>
<td><a href="mailto:slyons@pswctup.org">slyons@pswctup.org</a></td>
<td>PH 425-917-7642</td>
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</tbody>
</table>
HEARING CONSERVATION (AUDIOGRAMS) AUDIT REVIEW

A key component of your Hearing Conservation Program is audiometric testing. Regularly scheduled audiometric testing identifies employees who are at risk of significant hearing loss by detecting changes to their hearing threshold over time. Audiometric testing and training are required annually for employees who are included in your hearing conservation program. To ensure compliance and to assist our districts in developing an effective audiogram program, we conduct an annual Hearing Conservation Program audit. The purpose of this audit review is to guide our member districts to maintain a safe environment for their employees and to reduce injuries related to hearing loss.

Onsite audiograms are a value-added benefit of membership with the Puget Sound Workers’ Compensation Trust and are provided at no cost to the district.

Below are the current Hearing Conservation (Audiograms) Audit Review questions:

<table>
<thead>
<tr>
<th>Hearing Conservation (Audiograms) Audit Questions</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Does the District participate in the onsite audiogram program annually? (WAC 296-817-40015)</td>
<td>20</td>
</tr>
<tr>
<td>2. Do your employees receive annual hearing conservation training? (WAC 296-817-20020)</td>
<td>20</td>
</tr>
<tr>
<td>Note: Currently, the vendor provides training at the time of the audiogram appointment as part of the contracted service.</td>
<td></td>
</tr>
<tr>
<td>3. Are all job classifications which are considered to have a considerable risk of noise exposure included in the annual audiograms? (All-Trade Maintenance, Automotive/Metal/Wood/Welding, Shop Teacher (CTE), Bus Mechanics (Transportation), Grounds Maintenance, Music/Band/Choir/Orchestra) Note: 10 points for each classification tested.</td>
<td>50</td>
</tr>
<tr>
<td>4. Do new hires in positions with elevated noise levels receive audiograms within one year of their hire date? (WAC 296-817-40010) Note: Employers who utilize mobile test units are allowed up to one year to obtain a valid baseline audiogram for each exposed employee. The employees must still be given training and hearing protection as required by this chapter.</td>
<td>10</td>
</tr>
<tr>
<td>5. Number of Employees Tested</td>
<td>None</td>
</tr>
</tbody>
</table>

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PHYSICAL ABILITY EVALUATION AUDIT REVIEW

The Physical Ability Evaluation Program is an important part of your district’s risk reduction program and a proactive step towards reducing workplace injuries by determining if an employee candidate is capable of safely performing the essential functions of the job they have been offered. The purpose of the audit for this program is to guide our member districts in improving their current programs and encouraging districts without programs to participate in the Trust-sponsored program.

Please contact us with any questions if you are interested in setting up a program for your district. You may also contact us with any concerns you have regarding this audit or for other assistance. This program is a value-added benefit of membership with the Puget Sound Workers’ Compensation Trust and is provided at **no cost** to the district.

Below are the current PAE Audit Review questions:

<table>
<thead>
<tr>
<th>Physical Ability Evaluation Audit Questions</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Does your district participate in a Physical Ability Evaluation (PAE) Program?</td>
<td>30</td>
</tr>
<tr>
<td>2. Does your District participate in the Trust sponsored program?</td>
<td>10</td>
</tr>
<tr>
<td>3. Are the essential job functions in the job description so that the applicants are aware of them beforehand and know the requirements of the job before applying?</td>
<td>10</td>
</tr>
<tr>
<td>4. Does the job announcement/posting include wording regarding PAE requirement?</td>
<td>10</td>
</tr>
<tr>
<td>5. Do they test the highest injury classifications? (1st Highest Rated, 2nd Highest Rated, 3rd Highest Rated)</td>
<td>30</td>
</tr>
<tr>
<td>6. Does your district have an active program?</td>
<td>10</td>
</tr>
<tr>
<td>7. Vendor</td>
<td>None</td>
</tr>
</tbody>
</table>

*Note: This is a “best practice” program and is not a WISHA/DOSH compliance program.*

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RETURN TO WORK AUDIT REVIEW

The Return to Work (RTW) program is designed to reintegrate injured employees back to the workplace. A well run RTW program retains experienced workers, reduces costs and turnover, generates productivity, and fosters better employee relations. The goal of the RTW audit is to provide national best practices and share ideas on what high performing trust members are doing. A passing score of 80% provides a district with eligibility to participate in the Trust’s RTW Incentive Program.

Below are the current Return to Work Audit Review questions:

<table>
<thead>
<tr>
<th>Return to Work Audit Questions</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Do you have a policy? Does the district have a written RTW Policy that informs staff what district will do if a work-related injury occurs customized for the district?</td>
<td>5</td>
</tr>
<tr>
<td>2. Procedures and roles? Policy clarifies procedures and roles of key partners.</td>
<td>5</td>
</tr>
<tr>
<td>3. Policy has procedures for transitional and alternative duty position</td>
<td>5</td>
</tr>
<tr>
<td>4. Employee communication? Policy shared at New Employee Orientation or annually during reviews.</td>
<td>5</td>
</tr>
<tr>
<td>5. RTW Coordinator? RTW coordinator oversees all RTW activities for individuals who have sustained a compensable injury during work.</td>
<td>5</td>
</tr>
<tr>
<td>6. Relationship Building? RTW coordinator builds good working relationships with employees, supervisor, physician, and claims consultant.</td>
<td>5</td>
</tr>
<tr>
<td>7. Prompt Placement? Works with the RTW team to promptly place eligible employees in an appropriate position.</td>
<td>5</td>
</tr>
<tr>
<td>8. Monitors Progress? Frequent contact with employees to monitor progress and address problems.</td>
<td>5</td>
</tr>
<tr>
<td>Serves as a member of the safety committee.</td>
<td></td>
</tr>
<tr>
<td>9. Safety Committee? Serves as a member of the safety committee.</td>
<td>5</td>
</tr>
<tr>
<td>10. HR Manager? Does the HR manager have an integral role in assisting the RTW coordinator?</td>
<td>5</td>
</tr>
<tr>
<td>11. District Job Descriptions? Are there detailed job descriptions with essential functions and job requirements (physical requirements) for all positions in the district?</td>
<td>5</td>
</tr>
<tr>
<td>12. Modified and Alternate Duties Job Descriptions? Are there detailed job descriptions with essential functions and job requirements (physical requirements) for all modified and alternative duty positions in the district?</td>
<td>5</td>
</tr>
<tr>
<td>13. Modified Placement? Has the district placed injured employees in modified duty assignments (normal job duties) in the last year?</td>
<td>5</td>
</tr>
<tr>
<td>14. Alternate Placement Has the district placed employees in alternative duty assignment (temp position outside normal job duties) in the last year?</td>
<td>5</td>
</tr>
<tr>
<td>15. Alternate Duty positions? Does the district have a bank of alternative duty positions to offer to RTW employees? Focus on what employees can do.</td>
<td>5</td>
</tr>
<tr>
<td>16. Provider Relationship Does the district have a relationship with a medical provider who understands the district’s RTW policy?</td>
<td>5</td>
</tr>
</tbody>
</table>

Note: This is a “best practice” program and is not a WISHA/DOSH compliance program.

Return To Work Manager

Aliza Hauser ahauser@pswctup.org PH 425-917-7660
**INDOOR AIR QUALITY (IAQ) AUDIT REVIEW**

Good Indoor Air Quality (IAQ) contributes to a safe and healthy educational environment and enhances the performance of students and staff. We support our member districts in building a proactive, preventive IAQ Program, and through offering site assessments and individualized consults to solve specific IAQ problems.

Our IAQ audit is performed every other year, addresses the main elements of a proactive IAQ Program and is based on guidance from the Environmental Protection Agency (EPA) and the WA State Department of Health.

**Below are the IAQ Audit Review questions:**

<table>
<thead>
<tr>
<th>Indoor Air Quality Audit Questions</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. IAQ procedure: Is there a written district IAQ procedure or policy that is communicated to all employees and is consistently followed?</td>
<td>10</td>
</tr>
<tr>
<td>2. IAQ Coordinator: Is there a designated IAQ Coordinator with appropriate knowledge and authority who collaborates with the WCT?</td>
<td>10</td>
</tr>
<tr>
<td>3. Reporting concerns: Is there an IAQ concern reporting form or procedure that employees are aware of and have easy access to?</td>
<td>6</td>
</tr>
<tr>
<td>4. HVAC expertise: Does the district have its own trained &amp; qualified HVAC personnel or hires contractors?</td>
<td>10</td>
</tr>
<tr>
<td>5. Outside assistance: Does the district seek assistance from outside experts (WCT, contractors, regulatory agencies, etc.) when needed?</td>
<td>6</td>
</tr>
<tr>
<td>6. Communication: Is there timely, good, open communication between partners regarding IAQ problem assessment and resolution?</td>
<td>6</td>
</tr>
<tr>
<td>7. Education: Does the district make proactive efforts to educate ALL staff regarding IAQ/air contaminants/mold issues and the employees’ responsibilities in these areas?</td>
<td>6</td>
</tr>
<tr>
<td>8. Documentation: Does the IAQ coordinator maintain a central file documenting IAQ issues and resolutions?</td>
<td>6</td>
</tr>
<tr>
<td>9. Preventive maintenance: Does the district have a documented preventive maintenance program for the HVAC system of all occupied buildings?</td>
<td>6</td>
</tr>
<tr>
<td>10. Cleaners, disinfectants: Does the district use low hazard, “green,” unscented cleaning products, and an EPA certified disinfectant?</td>
<td>6</td>
</tr>
<tr>
<td>11. Vacuums: Are there HEPA filters or bags on all vacuum cleaners?</td>
<td></td>
</tr>
<tr>
<td>12. Chemicals: Does the district have a chemical purchase and use policy or procedure that is communicated to all employees? Are ALL employees directed to use only district approved and purchased chemicals? Is the presence of chemicals in classrooms occasionally checked?</td>
<td>10</td>
</tr>
<tr>
<td>13. Walk through inspections: Are there periodic walk-through inspections to address various elements of IAQ such as ventilation, cleanliness, stains, visible mold, moisture, water leakage, etc.?</td>
<td>6</td>
</tr>
<tr>
<td>14. Remediation water &amp; mold: Is water and mold intrusion properly assessed and remediated by qualified district personnel or contractors?</td>
<td>6</td>
</tr>
</tbody>
</table>

*Note: This is a “best practice” program and is not a WISHA/DOSH compliance program.*

**Industrial Hygiene Consultant**

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SCIENCE LABORATORY SAFETY AUDIT REVIEW

Science education often includes experiments and demonstrations using highly hazardous chemicals. Hazardous chemicals need to be stored properly and the activities surrounding their use need to be planned and executed in a safe manner. Laboratory work is regulated both at the Federal and State levels - WAC 296-828 is entitled Hazardous Chemicals in Laboratories. To assist our districts with both safety and legal compliance, the Trust developed a proactive Science Laboratory Safety Program, which offers a model Chemical Hygiene Plan (CHP), references and checklists and free lab safety training, as well as advanced level Chemical Hygiene Officer (CHO) training. The Science Laboratory Safety Audit is performed every other year, reviews the key elements of the district’s science safety program and practices, and recommends corrective actions as needed.

Below are the current Science Laboratory Safety Audit Review questions:

<table>
<thead>
<tr>
<th>Science Lab Audit Questions</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. CHO: Is there a designated and supported Chemical Hygiene Officer who has authority and is effective?</td>
<td>9</td>
</tr>
<tr>
<td>2. CHP: Is the Chemical Hygiene Plan (CHP) complete, specific, and up to date?</td>
<td>9</td>
</tr>
<tr>
<td>3. Spills: Is there a written Spill Plan, is spill training completed and does each room with hazardous chemicals have an appropriate spill kit?</td>
<td>6</td>
</tr>
<tr>
<td>4. CHP communication: Is CHP shared with and processed by all science staff?</td>
<td>6</td>
</tr>
<tr>
<td>5. Direction/Supervision: Is there a system in place to direct and supervise purchases and other chemical safety-related activities?</td>
<td>6</td>
</tr>
<tr>
<td>6. Lab walk-through: Is there periodic (self)assessments/inspections completed and documented? Are corrective actions taken as needed?</td>
<td>8</td>
</tr>
<tr>
<td>7. Safety equipment: Is safety equipment assessed, maintained and inspected as needed (eye washes, safety showers, general ventilation, exhaust ventilation, fume hoods, fire extinguishers, fire blankets)? Is it documented?</td>
<td>6</td>
</tr>
<tr>
<td>8. Inventories: Are up to date chemical inventories readily available?</td>
<td>6</td>
</tr>
<tr>
<td>9. Safety Data Sheets (SDS): Are SDSs (Safety Data Sheet) for all Hazchem's readily available?</td>
<td>6</td>
</tr>
<tr>
<td>10. Labeling: Are all chemical containers properly labeled?</td>
<td>6</td>
</tr>
<tr>
<td>11. Training: Does all science staff complete basic science safety and hazard communication training (SafeSchools/Vector Solutions or equivalent) and additional, hazard specific training?</td>
<td>6</td>
</tr>
<tr>
<td>14. Is there a hazardous waste management system in place, communicated to science staff?</td>
<td>6</td>
</tr>
<tr>
<td>15. Consistency: Are site visit observations consistent with information received?</td>
<td>6</td>
</tr>
</tbody>
</table>

Industrial Hygiene Consultant

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