

INJURY PREVENTION PROGRAM

Applied Behavior Consultants, Inc.



2014

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POLICY

SAFETY AND HEALTH IN THE WORKPLACE

It is our policy to have a safe and healthful workplace. Therefore, we have implemented the Injury and Illness Prevention Program that is outlined on the following pages. In compliance with this Program, we maintain a regular inspection schedule to ensure safe working conditions. We also conduct orientation and training programs to teach employees safe working habits and techniques.

POLICY STATEMENT ON SAFETY

It is the policy of Applied Behavior Consultants, Inc. that accident prevention shall be considered of primary importance in all phases of operations and administration.

It is the intentions of the company's top management to provide safe and healthy working conditions and to establish and insist upon safe practices at all times by all employees.

The prevention of accidents is an objective affecting all levels of the organization and its activities. It is, therefore, a basic requirement that each supervisor make the safety of employees an integral part of his or her regular management function. It is equally the duty of each employee to accept and follow established safety regulations and procedures.

Every effort will be made to provide adequate training to employees. However, if an employee is ever in doubt how to do a job safely, it is their duty to ask a qualified person for assistance.

Employees are expected to assist management in accident prevention activities. Unsafe conditions must be reported. Fellow employees that need help should be assisted. Everyone is responsible for the housekeeping duties that pertain to their jobs.

Any injury that occurs on the job, even a slight cut or strain, must be reported to management as soon as possible. In no circumstance, except an emergency, should an employee leave a shift without reporting an injury that occurred.

When you have an accident, everyone loses; you, your family, your fellow workers and the company. Please work safely. It's good for everyone.

Dr. Morrow & Brenda Terzich-Garland

General Safety Rules

Certain basic principles of safety are so important that they can only be expressed as "rules." These safety rules are a basic part of our Injury Prevention Program, and are also part of our disciplinary procedures. All employees need to know and follow these Safety Rules and all supervisory and administrative personnel must enforce them. The following general safety rules apply to all personnel.

1. All work-related injuries or illnesses, however slight, must be reported to your supervisor immediately.
2. Report unsafe conditions in the workplace and including defective tools or other equipment, to your supervisor or the Director immediately.
3. Supervisors shall insist on employees observing and obeying safety rules and established safe job procedures.
4. Personal protective equipment must be worn or used in any area for which it is required.
5. Use only the proper tool for the job. Do not use defective tools or equipment. If the proper tool is not available, request assistance from your supervisor before proceeding.
6. Get assistance in lifting if item or clients that you feel you are unable to lift it safely.
7. If a repetitive task causes you discomfort, or you feel it is unsafe or unhealthy report it to your supervisor immediately.
8. Avoid slippery or wet floors. Clean up spill as they occur.
9. Horseplay and/or practical jokes are strictly prohibited.
10. Alcohol and other drugs are prohibited.

ORGANIZATION AND RESPONSIBILITIES

Our Injury Prevention Program is designed to encourage all personnel to participate in helping us reach our goal of having an injury and illness free workplace. While the program meets Federal and State Safety and health regulations, this is secondary to our primary goal of promoting safety at ABC, Inc. It is the management and organization of our Injury Prevention Program that makes the difference between an effective program and one that is largely a waste of time and money. At ABC, inc., safety is everyone's responsibility.

An overview of our Injury Prevention Program activities includes the following:

- Assigning responsibility.
- Encourage employees to communicate with all levels of administration regarding safety and health matters.
- New employee safety orientation.
- Department safety training.
- Quarterly Safety Committee meetings.
- Hazard assessment including periodic campus safety inspections.
- Supervisory accident investigation.
- Disciplinary procedure to encourage safety compliance.

The following individuals have responsibility for our Injury Prevention Program:

Directors

Safety Committee [Staffing Specialist/COO/OM]

Employees

Parents

Specific responsibilities have been assigned as follows:

ADMINISTRATIVE CABINET

While all members of the Administrative Cabinet are responsible for safety and health in the workplace, there is one member with authority and is directly responsible for the safety program.

Name/Title: Kathy Tucker, Chief Operations Officer

Some of this person's responsibilities are to:

- Set policy.

- Assign responsibility and accountability to individuals.
- Review and evaluate results.
- Provide active leadership by participation, example, and a demonstrated interest in the program.

SAFETY DIRECTOR

Amanda Jimenez, Employee Benefits Coordinator

Some of the Safety Director's responsibilities are as follows:

- Coordinate the safety and health activities of all involved individuals and groups such as the safety committee, etc.
- Keep up to date information on local, State, and Federal safety and health regulations.
- Keep all levels of management informed of these laws and standards.
- Plan, organize, and coordinate safety and health training.
- Set up safety and health inspection procedures and follow up to make sure any necessary corrective action is completed.
- Set up accident reporting and investigation procedures. Follow-up on the status of safety recommendations submitted by employees, the Safety Committee, and the workers' compensation safety representative.
- Review injury reports from workers' compensation insurer and provide analysis of data to Safety Committee.
- Set up a program for the medical treatment for injured employees. The program includes, first aid equipment, designated trained First Aiders, and procedures to provide additional medical treatment.
- Maintain liaison with outside agencies such as local and State agencies, and the insurance carrier.
- Keep management informed.

SUPERVISORS

Some of the Supervisors' [Program Managers/Directors]/Office Manager [Behavior Consultants] responsibilities are as follows:

- Keep informed about safety and health regulations and procedures affecting the operations.
- Make sure every employee receives safety orientation and training. This will occur at/during NTT [New Tech/Tutor Training]
- Be aware of all safety considerations when introducing a new process, procedures, machine or material into the workplace.

- Make sure that employees follow all safety and health regulations and work practices.
- Investigate accidents that may occur, identify the corrective action necessary to prevent a similar accident from occurring through timely follow-up.
- Report without delay, any unsafe or unhealthful conditions which they cannot correct.

EMPLOYEES

- Work in accordance with the safety rules and regulations.
- Report all injuries, unsafe conditions and practices to your supervisor.
- Ask questions if there is a misunderstanding about the way to perform a duty. Do not attempt to perform any job you have not been properly trained to do.
- Contribute ideas or suggestions for improvement of the safety program.

SAFETY COMMITTEE

The following individuals serve as members of the **Safety Committee**:

Suggested staff:

Kathy Tucker, Chief Operations Officer

Amanda Jimenez, Employee Benefits Coordinator

Linda Olinger, Julie Wilken, Christina Childers, Feliz Granados

Aileen Rasmussen, AA Ontario School, School Administrative assistants (Sacramento and Ontario site),
East Bay Admin Assistant

Some of the Safety Committee members' responsibilities are as follows:

- Meet at least quarterly.
- Participate in and review results of periodic scheduled inspections.
- Participate in investigation and analysis of accidents involving injuries or illness and where appropriate make suggestions for corrective action.
- Review the potential safety or health hazards of all new processes, methods, or materials introduced into the workplace.
- Serve as a conduit for communication between employees and management, investigating any allegations of hazardous conditions brought to a committee member's attention and make its own inspections and recommendations where necessary.

ACCIDENT/INCIDENT REPORTS

Supervisor's Report of Injury/Incident Report

If an accident occurs in a supervisor's area of responsibility, the Supervisor's Report of Accident/Incident Report will be completed within 24 hours or as soon as practical. Specific to the identification of hazard, all factors that may have caused, or contributed to, the accident are to be noted

in the appropriate section of this report. The report is filed with the Safety Director who, after review passes one copy to our insurance carrier.

Supervisors should investigate all incidents that result in injury, first aid or medical treatment. Any and all incidents form the potential for severe physical injury and major equipment damage. Supervisors are also encouraged to investigate close calls.

IDENTIFYING AND EVALUATING WORKPLACE HAZARDS

To maintain a safe and healthful workplace we need to have a way to identify hazards in the workplace. Recognizing that unsafe work practices generally cause more accidents than unsafe conditions (by themselves), we intend to focus on both.

Inspection of the workplace is our primary tool to identify unsafe conditions and practices. The purpose of the inspection is to identify and correct physical conditions, dangers or unsafe work practices before an accident occurs. Inspections of the physical plant facilities and equipment will be conducted each quarter. Inspections of the entire campus will be done twice a year in April and October. Each member of the Safety Committee will conduct an inspection of their assigned area. After each inspection, the safety committee must be alerted and ensure corrective action is taken, if needed.

In addition to the periodic inspections noted above, hazard assessments are/were made:

- When new, previously unidentified hazards are recognized;
- When occupational injuries and illnesses occur; and
- whenever workplace conditions warrant an inspection.

The majority of accidents result from a person's failure to follow safety procedures and rules. These unsafe acts, as they are called, need to receive your attention. Unsafe acts usually occur quickly, for short periods of time. When you observe an unsafe act, immediately bring it to the employee's attention, explaining what you observed, and how it could contribute to an injury to themselves or others. Then show the employee the expected or correct way of doing the job.

As part of the Safety Program, an inspection check sheet is provided. The inspections should cover: [submit to Corporate monthly – sign off]

- Machinery, hand tools or other equipment in poor condition or being used improperly.
- Uncluttered classrooms, working space and overhead clearances.
- Maintenance of equipment furnishings and facilities.
- Physical condition of floors, platforms, stairs and railing.
- Workplace lighting (working areas, storage areas).
- Ventilation of work, storage and toilet areas.
- Fire hazards and protective devices.
- Exits, pathways.
- First aid kits, supplies and equipment.
- Play structure
- Toys

We must continuously search out and correct unsafe and unhealthful conditions and work practices. This responsibility is everyone's. All employees are responsible for inspecting their own workplace on a daily

basis and for promptly reporting unsafe or unhealthful conditions to their immediate supervisor unless they are able to correct the situation themselves.

ACCIDENT INVESTIGATION

The purpose of an accident investigation is the prevention of similar accidents. Identifying the "causes" of the accident must be objective and factual. The purpose is not to place blame.

However, if the injured employee or another employee contributes to the accident as a result of failing to follow operating procedures or safety rules, then appropriate disciplinary action will be taken.

Procedures for investigating all reported workplace accidents and hazardous substance exposures include:

- Interviewing injured workers and witnesses;
- Examining the workplace for factors associated with the accident/exposure;
- Determining the cause of the accident/exposure;
- Taking corrective action to prevent the accident/exposure from recurring; and
- Recording the findings and actions.

The following suggestions will help you perform a successful investigation:

1. Visit the accident scene as soon as possible--while facts are fresh and before witnesses forget important details.
2. If possible, interview the injured worker at the scene of the accident and "walk" him or her through what happened taking care not to cause the same accident again.
3. All interviews should be conducted as privately as possible. Interview witnesses one at a time. Talk with anyone who has knowledge of the equipment or circumstances contributing to an accident, even if they did not witness it first hand.
4. Interview witnesses and record information.
5. Document details graphically. Use sketches, diagrams and photographs as needed. Take measures when appropriate.
6. Focus on causes and hazards. Develop a description of what happened, how it happened why it happened and how it can be prevented. Determine what caused the accident, not just the injury.
7. Every investigation should address prevention of future actions. Corrective actions usually involve training or retraining, changing processes or procedures, correcting unsafe conditions or any combination of the above.
8. If a third party or defective product contributed to the accident, save any evidence. It could be critical to the recovery of claims cost.
9. When investigating an accident, the following questions should be asked:
 - What happened? The investigation should describe what took place that prompted the investigation (i.e., an injury to an employee, an incident that caused production delay, damaged material, or any other conditions recognized as having potential for losses or delays).
 - Why did the accident happen? The investigator must obtain all the facts surrounding the occurrence, including: the cause of the accident; the individuals involved in the accident; whether there were any witnesses; whether the employee was qualified to perform the functions involved in the accident; whether the employee was properly trained; whether there were proper operating procedures for the task involved; and whether such procedures were followed and, if not, why.

- What should be done? The person conducting the investigation must determine which aspects require additional attention. The purpose is not to establish blame, but, rather, to determine what type of corrective action will eliminate the causes of the accident and prevent future accidents.
- What action has been taken? Actions already taken to reduce or eliminate the exposures being investigated should be noted, along with those remaining to be addressed. Any interim or temporary precautions should also be noted. Lastly, any pending correction action and reason for delaying its implementation should be noted.

CORRECTING UNSAFE CONDITIONS AND WORK PRACTICES

1. Maintaining a safe and healthful workplace requires correcting identified potentially hazardous workplace conditions. Knowing and failing to correct potentially hazardous situations is against policy.

Although it is our intention to eliminate all unsafe conditions and work practices as quickly as possible, some corrective action will necessarily require longer periods of time and/or larger expenditures of capital. Because of this, it will be necessary to evaluate the seriousness of the hazards and focus our attention on those that have the potential to cause serious injury or illness.

Hazards shall be corrected according to the following procedures:

If possible, immediately when observed or discovered; or

- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers who are required to correct the hazardous condition shall be provided with the necessary protection. One way to evaluate the seriousness of a potential injury is to try to determine whether or not the resulting injury would involve hospitalization, amputation of a limb or part of a limb, a fracture, or permanent disfigurement or disablement. These kinds of injuries are certainly serious and conditions likely to cause them should receive our immediate attention.

Another way is to examine our accident records which clearly show us which types of accidents and injuries tend to be more expensive (generally a good measure of severity of the injury).

Once we have determined that an unsafe condition or work practice exists, we need to decide what to do about it and, get it done.

All personnel have a responsibility for helping to make sure we all have a safe and healthful place to work.

Corrective action generally falls into four categories:

2. Training once a safe job procedure has been established, employees can be trained in the proper (safe) method to do the job. While training is always desirable, the problem with this solution is that it requires constant supervision to make sure employees continue to do the job in the manner in which they have been trained to do.

Often it is quite obvious what corrective action we ought to take. Sometimes there will be several possible solutions. We have several procedures we use to do this:

Procedure: Program Schedule & Corrective Action:

When corrective action for an unsafe condition or work practice will involve multiple steps or cannot be completed immediately, a plan of action will be developed. It will include who is responsible and the estimated date of completion.

Procedure: Accident & Corrective Action Under Supervisor Control

Our policy requires that supervisors complete an accident report whenever an accident occurs. When corrective action is under the supervisor's control, the supervisor will indicate what is being done and also note the approximate date the condition will be corrected.

Procedure: Safety Inspection - Corrective Action

When the regular safety inspection discloses an unsafe condition or job practice, the corrective action will be noted on the inspection report. This report becomes an attachment to the Safety Committee minutes and is also used to document follow-up and completion date.

SAFETY TRAINING

The law requires that we provide several different types of safety training to our employees:

- A general safety orientation to all new employees. This will occur during the NTT -- New Tutor/Technician Training. [Mandatory for all new employees] [Video/test]
- Specific training on how to do their assigned job. ProAct when needed.
- Training on how to use any personal protective equipment provided, such as latex or non latex gloves when needed.
- Allergies

Training and instruction is provided:

1. To all new workers;
2. To all workers given new job assignments for which training has not previously been provided;
3. Whenever new processes, procedures or equipment are introduced to the workplace and represent a new hazard;
4. Whenever the employer is made aware of a new or previously unrecognized hazard.
5. To supervisors to familiarize them with the safety and health hazards to which workers under their immediately direction and control may be exposed; and
6. To all workers with respect to hazards specific to each employees job assignment. Safety education and training for employees should commence at the time of employment. Before people actually begin an assigned task they should complete a short training course to familiarize themselves with safety policies. This portion of the training course should include:
 - An explanation of safety policy.
 - Familiarization with the general safety rules of and enforcement policies.
 - The requirement for immediately reporting all injuries along with information on available medical treatment.
 - The necessity for reporting all unsafe conditions to their supervisor.
 - Information concerning the safety training which will be given by supervisors.

The supervisor should continue the safety instructions by discussing the safety rules of that specific department. This should be followed by instruction in the hazards associated with the specific job to

which the worker is being assigned. As an example, if personal protective equipment is required on the job, it should be issued and instructions given in the use of this equipment. It is most desirable to follow this initial instruction by a complete review within a week or two after assignment to the job. This will assure that the new employee fully understands the information given at the time of employment and at the time of assignment to the job.

Procedure: Safety Orientation

Supervisors, with assistance from the Safety Director if desired, will provide every employee under their jurisdiction with a general orientation to our safety policy and our safety rules along with safety instructions specific to the employee's assigned job and any personal protective equipment they may be issued. These procedures are in the New Employee packet, in the Essential Policies packet. There will also be 2 videos shown at the New Tutor/Tech Training [when the supervisor decides to give training/depending on how many new hires] or if the employee is an administrative staff, within 14 days of hire.

Department Safety Meetings

Purpose: Department safety meetings are short (5-10 minutes), on the job, monthly meetings [topics will be provided] to help build employee safety awareness. Safety meetings can be used to address actual problems which exist on the job. The supervisor leading the meeting can draw on the experience of employees of the department and use that experience to remind all workers, especially newer workers, of the dangers of working with particular kinds of machinery, tools, equipment and materials. Documentation of the topics covered and employees present must be maintained for all department safety meetings.

What to Talk About: Talk about work practices, equipment, materials, attitudes and anything else which may cause or contribute to a work-related accident or illness.

Choose a topic where you think safety review may be needed. For example, if you notice that walkways are blocked because boxes or files are not picked up, discuss it. If there has been an accident or a near accident on the job, talk about it. What happened? Where did it happen? How can it be prevented from happening again?

How to Run a Good Meeting:

1. Hold the meeting where people can sit and relax.
2. Be sure to communicate in a manner that is readily understandable.
3. Choose the topic carefully. Topics should be about health and safety problems which really exist on the job. Research the problem before the meeting. There is plenty of easy-to-read material around on almost every hazard you can think of. For machinery, consult the manufacturer's operations manual; for handling toxic substances, get a copy of the material safety data sheet.
4. Don't choose too broad a topic. You can't cover Ergonomics in a 5-10 minute meeting. Instead, try a topic like "Adjusting your Chair."
5. Encourage as much employee participation, but keep your meeting short.

COMMUNICATION

Our Injury Prevention Program is designed to allow and encourage employees to communicate with various levels of administration on safety, health and security matters and also to provide the necessary

mechanism for administration to keep employees informed regarding matters important to their health and safety in a manner readily understandable by all.

All employees are encouraged to inform their supervisor of any concern they have about the potential hazards of their workplace. Employees may also inform the Safety Committee, the Safety Director, or administrators about such concerns. Employees who wish to do so, may also report concerns anonymously by sending a written notification to the Safety Director.

Employees are required to report immediately any incident involving a threat or act of violence to their supervisor or Office Manager. The supervisor must report the matter immediately to the Safety Committee who will investigate the matter and take appropriate corrective action. There are many methods that administration can use to inform employees of health and safety matters. However, whatever method is used, administration is responsible to ensure that employees understand the situation and what action or changes both administration and the employee must take.

DISCIPLINE - RIGHTS AND RESPONSIBILITIES

It is our intention to provide a workplace as free of safety and health hazards as possible for our employees. Doing so will minimize occupational injuries and illness which can have tragic effects on the lives of our employees.

California state law requires us to have a "system for ensuring that employees comply with safe and healthy work practices which may include disciplinary action."

Just as the law requires us to provide a workplace free of safety and health hazards so does the law require employees to comply with established safe practices, which would include complying with safety rules and using any and all personal protective equipment we provide. All supervisors are to enforce our safety rules and ensure that employees comply with established safe practices (including use of personal protective equipment).

An unsafe job procedure is not to be tolerated. Any supervisor or administrator observing unsafe job behavior is expected to bring it to the attention of the person's supervisor. Supervisors are expected to take steps immediately to correct the behavior.

Any disciplinary measures taken must adhere to policy and procedures as noted in the Staff Handbook, Section 1.4, page 1. Formal retraining on safety procedures will be performed as needed

ABC, Inc. considers threats and/or acts of violence by its employees a serious violation of the policy. All reports of threatening or violent conduct will be thoroughly investigated. Based on the circumstances and nature of such conduct, the ABC, Inc. may forego the above mentioned disciplinary steps. Employees who engage in threatening or violent behavior will be subject to a range of disciplinary actions up to and including termination.

SAFETY "TO-DO" CHECKLIST

	Daily	Weekly	Monthly	Quarterly	As Needed/Asked
Housekeeping: Physical condition of floors, stairs, railings. Exits, Pathways are free of debris, furniture	X				X
Check equipment in poor condition or being used improperly			X		X
Make sure classrooms/working space is uncluttered		X			X
Workplace lighting			X		X
Ventilation of work, storage, and toilet areas				X	X
Fire hazards and protective devices			X		X
Exits, Pathways			X		X
First Aid Kits, supplies and equipments			X		X
Report incidents/Accidents	X	X	X	X	X
Safety Meetings				X	X
Safety Trainings/New Hires					X

Tips on how to Safe guard the work area for “in home”

1. **Store household chemicals on higher shelves or cabinets.** Make sure all of your household chemicals are out of reach and out of your children's way. If necessary, you can purchase shelve and cabinet locks or child-proof caps also.
2. **Keep all medicine out of children's reach.** Even children medication should be kept out of reach, they can easily overdose on children medication as easily as they can on adult medication. The only exception would be if the child has a medical condition which requires them to carry certain medications on them in case of emergencies. Other than that, keep all medications out of children's reach and make sure the bottles have child-proof caps.
3. **Anchor down any large furniture.** Any tables, desks, dressers, and any other largefurniture should be anchored down with an anchor strap to avoid the furniture tipping or falling over if the child climbs on it.
4. **Identify places where trips and falls are likely**—loose rugs and wires, poorly lit staircases, and clutter on the floor are common culprits. Remember that falls are the leading cause of injuries at home; taking time to eliminate hazards will go a long way to making everyone safer.