



**WRITTEN WORKPLACE
SAFETY PROGRAM
(WWSP)**

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I. GENERAL POLICY STATEMENT and AUTHORIZATION

Clark County School District has developed a Written Workplace Safety Program (WWSP) in order to assist in establishing and maintaining a safe and healthy workplace. Our most vital resource and our number one priority is *our employees*. They are essential to accomplish CCSD's public education mission.

Clark County School District's policy is to conduct its operation in a safe manner to minimize the risk of accidents, injuries and illnesses. The District's basic philosophy is that all personal injuries can and should be prevented. This is accomplished, in part, through the implementation of an effective written safety program.

The objectives of the WWSP are to:

- Reduce the frequency and severity of occupational accidents and illnesses.
- Provide uniform safety and health guidance for **all** personnel.
- Comply with **all** applicable federal, state and local, safety and health regulations.

No matter how safe a work environment is, much of the success of an effective safety program depends upon the employees themselves. "Safety starts with me at CCSD!" The Clark County School District expects **all** employees, at every level, to follow the requirements set forth in this WWSP. Each employee is responsible for using safe work practices, and immediately alerting management of any health and safety hazard observed during the course of their work.

The management of Clark County School District cares about the safety and well-being of all our employees and welcomes your suggestions. As Director of Risk Management, I hereby authorize and fully support the implementation of this program.

With everyone's support, *Clark County School District* will satisfy all legal requirements and fulfill our obligations to our employees by providing a safe and healthy workplace.



Kimberly Krumland, Director, Risk Management Department

March 10, 2020

Date

II. ASSIGNMENT OF RESPONSIBILITY

The following sections describe those responsibilities of management and employees that will ensure that the WWSP is successfully implemented and enforced throughout Clark County School District. The prevention of bodily injury and safeguarding the health of employees are the first considerations in all workplace actions and are the responsibility of every employee at every level. As your employer, CCSD accepts the responsibility for leadership of our safety and health program, its continuing effectiveness and improvement, and the provision of safeguards required to ensure safe conditions.

A. Superintendent of Schools (or designee)

- Ensure the development and implementation of the District Safety Program
- Ensure accountability
- Allocating adequate resources

B. Directors/Site Administrators/Region Staff

Directors, Site Administrators, and Region Staff must set policy and provide leadership by participation, example and a demonstrated interest in the safety program. Responsibilities include:

- Developing Standard Operating Procedures (SOP)
- Adopt and implement approved district safety procedures and guidelines
- Ensuring site safety records are kept
- Maintaining a safe and healthy work site

C. Director, Risk Management Department (or designee)

- Responsible for administration of the WWSP. Any questions regarding the safety program should be directed to the Risk Management Department.
- Advise senior management and develop district safety procedures and guidelines on safety and health issues.
- Monitor general district compliance with safety, health and environmental protection regulations and codes.
- Audits and manages the safety and health program to ensure that the program is appropriate to workplace conditions.
- Maintain current information on local, state and federal policy issues.
- Act as a liaison with governmental agencies.
- Maintain OSHA 300 Log data and prepare annual summary of work-related injuries and illnesses.

D. Safety Coordinator

- Provide statistical data and reports regarding work-related accidents, injuries and illnesses.
- Plan, organize and coordinate safety training, based on training requests, and information developed from accident trend analysis.
- Oversee activities of the district Safety and Health Advisory Group (SAG).
- Review incident investigation reports.
- Review all job hazard analysis for each job descriptions to make sure it's in compliance.

- Evaluate trends and make recommendations to change procedures to reduce accidents.

E. District Safety and Health Advisory Committee Group (SAG)

The District Safety and Health Advisory Committee Group (SAG) consists of division and region representatives, central office department representatives, and labor groups, that wish to participate, who shall oversee safety policy and encourage safety awareness.

- Recommend/Review proposed additions, deletions and revisions to the district safety policies and regulations.
- Review district safety and loss control data and recommend solutions.
- Hold meetings semi-annually and/or more frequent if needed.

F. Designated Site Safety Employees

- Appointed by the site administrator to facilitate, coordinate and monitor site safety hazard control activities.
- Provide relevant safety and health information to your assigned site.
- Assist Risk Management/risk assessors in investigating incidents (accidents), close call (near miss) incidents, and reported safety hazards to determine primary cause(s) and identify appropriate corrective measures.
- Conduct CCSD hazard assessments, and monitor site safety inspections and complete required Job Hazard Analysis reports (JHA) and update as needed.
- Conduct CCSD Workplace Hazard Assessment Personal Protective Equipment (PPE) Certification evaluations.
- Ensure appropriate corrective action is taken on a timely basis to resolve identified hazards.

G. Supervisors

CCSD supervisors and managers are responsible for developing the proper attitude toward safety and health. Ensure that all operations are performed with the utmost regard for the safety and health of all personnel involved. Prompt correction of hazard(s) will increase employee trust!

Employees are to report unsafe acts and conditions initially to their immediate supervisor. The supervisor is responsible for acting on such reports and for creating and directing safe work procedures. Supervisory personnel are expected to do everything within their control and authority to assure a safe workplace. Make certain that employees reporting to them know and abide by Clark County School District safety policies and procedures, utilizing the following steps. **Note:** An uncorrected identified hazard could result in a willful citation if discovered by a Nevada Occupational Safety and Health Administration (OSHA) compliance officer.

- Provide new employees with an orientation of job hazards and safe work practices associated with their defined duties prior to assignment.
- Ensure that those under their direction receive training on general and specific workplace safety.
- Keep informed of new or revised safety and health regulations affecting the operations they supervise and ensure that employees under their supervision follow safe work practices.

- Ensure that the necessary safety equipment and protective devices are provided for each task.
- Advise Risk Management regarding training needs of the employees under their supervision.
- Ensure that equipment is maintained in a safe operating condition; and correcting unsafe and unhealthy conditions within their power.
- Investigate accidents to discover cause(s) and identify corrective action to prevent further occurrences.
- Keep records of all safety meetings and other training for quick access if requested.
- Promptly report all accidents, injuries and illnesses that occur on your site and complete the CCF-99. The link can be found at <https://ccsd.net/departments/risk-and-insurance-services/safety-forms>

H. Employees

All CCSD Employees are responsible for following all safety rules, working in a safe manner and for genuine cooperation with all aspects of the safety and health program.

“Safety starts with me at CCSD”

- Understand and comply with all safety rules and regulations established for their protection and the protection of their co-workers.
- Follow specific safe work practices and procedures given by their immediate supervisor or manager.
- Be alert to unsafe equipment and practices, and immediately report hazardous conditions or unsafe work practices to their supervisor.
- Promptly report all accidents, injuries and illnesses that occur while on the job to their supervisor **by the end of their shift** whether a physician’s attention is necessary or not. Complete a “Notice of Injury or Occupational Disease” Form C-1 and have your supervisor sign the document.
- If treatment is required, see a medical provider at any of the CCSD approved Preferred Medical Clinics. For life-threatening conditions, dial 911 or seek treatment at the nearest hospital emergency room

III. SAFETY COMMITTEES

Nevada OSHA requires that businesses with more than 25 employees, convene a safety committee pursuant to NRS 618.383. Safety committees are established for the purpose of maintaining open communications, and to ensure discussion on safety issues among representatives from all areas of the district.

The primary responsibilities of the safety committee members include:

- Conducting meetings on a regular basis to discuss safety and health issues, suggestions and concerns
- Maintaining an active awareness of potential site safety and health hazards
- Acting as a representative for employees in their work areas
- Bringing any potential safety and health hazards to the attention of other committee members and initiating discussion on possible actions to eliminate those exposures.

A. Safety Committee Meeting Minutes

Copies of minutes of all committee meetings should be conspicuously posted on a bulletin board. Preferably next to the Employees Right to Know and The Nevada Safety and Health Posters, provided by the Division of Industrial Relations. **NOTE:** Records of the safety committee meetings and activities **must** be documented and maintained for at least **three** years NAC 618.542(2)(a).

B. Safety Committee Member Selection

Safety committee members can be assigned by management, voted on by employees, or selected from volunteers. The safety and health committee shall have an **equal number of management and employee representatives**. The terms of committee members should be staggered in order to provide continuity to the committee. Each department or site shall decide what works best for their organization.

Safety Committee Guidelines and Template can be found on the CCSD.net Risk Management website. The link can be found at <https://ccsd.net/departments/risk-and-insurance-services/safety-manuals>

C. Safety Committee Findings

Safety Committees review periodic safety inspections/audits and review records to assess workplace exposures as a proactive method for identifying potential loss exposures, in addition to evaluating existing controls for preventing injuries and illnesses.

D. Site Safety Committees

The purpose of the Site Safety Committee is to provide a forum for employee participation in assessing and enhancing workplace health and safety at CCSD, by fostering an ongoing communication and cooperation between employees and management on all issues related to safety and health. How the site safety committee is achieved:

- Assist management in communicating procedures for evaluating effectiveness of control measures used to promote safety and health practices on the site.
- Hold meetings quarterly and/or more frequent if needed.
- A copy of the safety committee minutes will be posted on a bulletin board in an employee conspicuous area.
- Review and update safety rules based on incident (accident) or close call (near miss) investigation findings; reports of unsafe conditions or practices; and accepting and addressing anonymous complaints and suggestions.
- Assist management in updating the safety program by evaluating injury and accident records; identifying trends and patterns; and formulating corrective measures and proper training to prevent recurrence.
- Participate in safety training and be responsible for assisting management in monitoring safety education and training to ensure that it is in place, that it is effective and documented.
- Conduct periodic safety inspections and compile and distribute reports on issues found at the facility.
- Evaluate department inspection reports, verifying corrective action was taken.
- Ensure the Safety Committee minutes are kept for three (3) calendar years and are

- readily available upon request.
- Use **only** the Safety Committee Guidelines and Template provided by Risk Management.
- **The original minutes** will be forwarded to and retained for a period not less than three (3) years by the Safety Coordinator at Risk Management.

IV. HAZARD IDENTIFICATION and EVALUATION SYSTEM

Hazard identification and evaluation is a key element in any effective safety program. Before existing and potential hazards can be prevented and controlled, they must be identified and assessed. Clark County School District has established several programs to accomplish this task.

A. Employee Occupational Safety and Health Concerns

All employees are not only encouraged, but responsible for notifying their immediate supervisor regarding conditions they believe to be a safety, health or environmental hazard, without fear of reprisal.

Notification may be made verbally or submitted electronically using an Employee Safety, Health, or Environmental Concern form, CCF-305, or emailed anonymously to Risk Management. The link can be found at <https://ccsd.net/departments/risk-and-insurance-services/safety-forms> (See Appendix A-2)

A copy is forwarded to the Risk Management, Safety unit for review and a possible site visit by a risk assessor to evaluate the situation. All employee reports are taken seriously by CCSD.

B. Ethicspoint Incident Management System

Ethicspoint Incident Management System and hotline is designed to enable all employees to easily and confidentially report any issue or instance of misconduct.

C. Site Safety Assessment Program

Risk Management's risk assessors are responsible for performing physical site assessments of educational facilities, administrative buildings, and generating safety recommendations based on their findings.

Directive(s) issued as a result of safety assessments, either scheduled or prompted by suggestion, should be distributed to all employees affected by the hazard, or posted on appropriate bulletin boards.

As a reminder, the Safety unit within Risk Management is the designated liaison between CCSD and Southern Nevada Health Department (SNHD). By the Nevada Administrative Code (NAC) the SNHD will visit all schools every six months to conduct a school inspection. The report is either emailed to the head custodian or office manager. Also, the report is emailed to the Safety unit. If the Health Department requests an internal investigation, the Safety unit will be notified and communicate with the assigned risk assessor to begin a safety concern inspection.

D. Supervisor's assisting with the Incident (Accident) Investigation and Corrective Action

Supervisors are responsible for assisting Risk Management's risk assessors in a cooperative manner to investigate accidents. Any work-related death, serious injury or illness, incident or close call (near-

miss) having the potential to cause death or serious physical harm will be investigated. A complete, well documented incident investigation will identify a problem(s) and lessen the chance of its recurrence.

The basic incident investigation sequence includes:

- Care for the injured
- Call Risk Managements, Safety unit 702-799-6496 Extension 5659
- Inspection of the accident scene
- Interview witnesses and the injured employees
- Determination of the causes of the accident
- Identification of corrective actions to prevent recurrence
- Completing and forwarding a copy of the Supervisor's Incident Investigation Report (Form CCF-99) to the Risk Management Department (See Appendix A-1)
<https://ccsd.net/departments/risk-and-insurance-services/safety-forms>
- Implementation of recommended corrective actions
- Periodic follow-up to ensure the problem(s) have not resurfaced

E. Records Review

Available resources for identifying and evaluating potential exposures:

- Risk Management Department Reports (Risk Assessment Checklist)
- SNHD School Inspection Report
- OSHA 300 Log of Work-Related Injuries and Illnesses
- Supervisor's Accident / Investigation reports (CCF-99 Form)
- Employee Reports of Safety and Health Concerns (CCF-305 Form)
- Job Hazard Analysis (JHA)
<https://ccsd.net/departments/risk-and-insurance-services/hazard-analysis>
- Hazard Assessment (Form RSK-F513)
- Safety Committee Meeting Minutes
<https://ccsd.net/departments/risk-and-insurance-services/safety-manuals>
- Safety training records **kept on file for three consecutive calendar years**

F. Workplace Hazard Assessment Certification

Hazards exist in every workplace in many different forms: falling objects, chemicals, hot surfaces, wet and slippery surfaces, flying sparks, noise and numerous other potentially dangerous situations. Using Personal Protective Equipment (PPE) is often essential, but it is generally the last line of defense. The Hierarchy of Controls are:

- Elimination – Physically remove the hazard
- Substitution – Replace the hazard
- Engineering Controls – Isolate people from the hazard
- Administrative Controls – Change the way people work
- Personal Protective Equipment (PPE) – Protect the worker with PPE

The Occupational Safety and Health Administration (OSHA) issued the Personal Protective Equipment Standard; also know as "The PPE Standard." Under this standard, CCSD is required to:

- Conduct hazard assessments of the workplace to determine what hazard(s) are present that require use of PPE and certify in writing that the assessments are performed.
- Select and provide employees with the appropriate PPE, require them to use and maintain it in a sanitary and reliable condition.
- Provide employees training on proper care, use and limitations of the selected PPE.
- Ensure the PPE is properly used.

CCSD has developed a Workplace Hazard Assessment Certification Form (RSK-F513) for conducting a Workplace Hazard Assessment to determine if hazards are present that require the use of Personal Protective Equipment. The form can be found at <https://ccsd.net/departments/risk-and-insurance-services/hazard-analysis> (See Appendix A-3).

G. Job Hazard Analysis (JHA)

Job Hazard Analysis establishes a method for analyzing potentially dangerous jobs for the purpose of creating a Standard Operating Procedure (SOP) for safety. Directors/Administrators shall require the development of a JHA for all hazardous jobs performed by their employees. The JHA shall be updated whenever the job changes or procedure deficiencies are noted. The form can be found at <https://ccsd.net/departments/risk-and-insurance-services/hazard-analysis> (See Appendix A-4).

These hazards may be caused by the equipment used to perform the tasks, the actions needed to perform the tasks, or the environment in which the tasks are performed. To help control identified hazards, involving employees in the JHA process will help minimize oversights. CCSD will analyze the steps employees take in their job duties and to identify means to minimize or eliminate the identified hazards. Your goal is to discover the following:

- What can go wrong?
- What are the consequences?
- How could it arise?
- What are other contributing factors?
- How likely is it that the hazard will occur?

The information gathered from job hazard analysis (JHA) may also be used in employee training; to identify reasonable accommodations under the Americans with Disabilities Act (ADA); to assist in writing job descriptions and procedures; safety audits; and with return-to-work programs. The OSHA guide to JHA can be found at <https://ccsd.net/departments/risk-and-insurance-services/hazard-analysis>

V. SAFETY COMPLIANCE and HAZARD CONTROL SYSTEM

A safety compliance system has been established to ensure that employees are aware of and comply with safe and healthful work practices. Ultimately, job hazard controls are implemented to bring CCSD facilities into compliance with the General Duty Clause and OSHA 29 CFR 1910, and 29 CFR 1926 standards.

The OSHA general duty clause, Section 5(a)(1) of the Occupational Safety and Health Act, requires that each employer furnish to each of its employees a workplace that is free from recognized hazards that are causing or likely to cause death or serious physical harm. Generally, this means:

- Hazards are materially reduced using the incremental abatement process
- Hazards are reduced to the extent feasible, and periodic assessments made to determine whether additional controls are feasible
- Hazard(s) are eliminated

Incremental abatement process includes identifying, assessing, setting deadlines, and implementing feasible controls (interim and/or permanent) to eliminate or substantially reduce the hazard(s) identified. This includes prioritizing which hazards are controlled first.

A. Hazard Control System

Hazard control is triggered by a determination that a hazard or potential hazard exists and includes methods and/or procedures for correcting unsafe or unhealthy conditions, work practices and procedures in a timely manner, based on whether the classification of the hazard is imminent or non-imminent.

- **Imminent Hazard**

An Imminent Hazard is any condition where there is reasonable certainty that a danger exists that can be expected to cause death or serious physical harm immediately, or before the danger can be eliminated. Serious physical harm is any type of harm that could cause permanent or prolonged damage to the body or which, while not damaging to the body on a prolonged basis, could cause such temporary disability as to require in-patient hospital treatment. Permanent or prolonged damage has occurred when a part of the body is crushed or severed, or sight in one or both eyes is lost.

If an imminent hazard is observed or discovered by an employee, the employee should notify their supervisor immediately. The supervisor shall notify the appropriate administrator immediately. Corrective measure shall be taken at once to abate the hazard, including placing an out-of-service, accident prevention tag on defective tools or equipment, as a temporary means of warning employees of an existing hazard. If the imminent hazard cannot be immediately abated, all personnel shall be removed from the area. The Director of Risk Management shall determine what safeguards and corrective measures are to be implemented.

- **Non-Imminent Hazard**

If a non-imminent hazard is observed or discovered by an employee, the employee's immediate supervisor and a safety committee member should be made aware of the exposure, in order that a corrective action can be implemented in a timely manner. Determination of the time allotted for correction of the hazard will be at the discretion of the employee's immediate supervisor.

B. Methods of Controlling Hazards

There are various ways to control hazards. Your first choice should be to eliminate the hazard. Your second choice would be to consider substituting a safer substance, tool or work method. Job hazard controls are engineering, administrative, and/or work practice controls used to eliminate or materially reduce hazards. While engineering controls, where feasible, are the preferred method, administrative and work practice controls also may be important in addressing hazards. The District's policy is to provide reasonable and adequate safeguards for the occupational safety and health of all employees.

- **Engineering Controls**

Engineering controls, where feasible, are the preferred method for controlling exposures. Engineering controls involve physically changing a machine or work environment, such as the installation of a point-of-operation safeguard.

- **Administrative Controls**

When engineering solutions are not feasible, administrative controls offer methods to lessen the exposure of workers to the identified hazard. However, administrative controls are considered less effective, because they usually do not eliminate the hazard. Administrative controls include changing how or when employees perform their jobs, such as scheduling work and rotating employees through work assignments; written safety policies and safe work practice rules; supervision and training.

- **Personal Protective Equipment (PPE)**

Personal protective equipment (PPE) may also be used to supplement engineering controls, work practice, and administrative controls, but may only be used alone when it is determined that other controls are not feasible or effective in reducing the exposure to acceptable levels. Personal Protective Equipment is considered the least effective control, because the employee is still exposed to the risk factor.

If Personal Protective Equipment is selected, a PPE program should be implemented. This program should address the hazard(s) present; the selection, maintenance, and use of PPE; the training of employees in its use; and monitoring of the program to ensure its ongoing effectiveness.

Where PPE is required, the District must provide it **at no cost** to employees.

OSHA Citation and Notification Posting Requirements

A. OSHA Citation and Notification of Penalty

When a site administrator receives an OSHA citation, the notice (or copy of it) must be posted at or near the place where each violation occurred to make employees aware of the hazard to which they may be exposed. The citation must remain posted for three (3) working days or until the violation is corrected, whichever is longer (Saturdays, Sundays and Federal Holidays are not counted as working days). The employer must comply with these posting requirements even if the citation is contested.

The Risk Management, Safety unit, must immediately be contacted. The Safety unit will investigate the OSHA citation and gather all documentation to provide to OSHA. It is greatly appreciated for sites to quickly gather all documents requested by the Safety unit because this is a time sensitive matter.

VI. SAFETY TRAINING

CCSD has established a training program in accordance with NRS 618.383. Under no circumstances should an employee perform their work duties until he/she has successfully completed the appropriate safety training.

Each department at each site in CCSD is responsible for developing topics and providing training for both new employees and existing employees who need training/retraining, for specific hazards they are exposed. The goal of any safety training program is not just to impart knowledge, but to affect behavior and provide employees with enough information so they can actively participate in protecting themselves.

Training must be conducted in a language and format the employees understand NRS 618.383(4). Also, temporary employment services shall provide specialized training concerning safety for the employees of the service before they begin work at each site NRS 618.383(7).

Resources include on-line safety training programs on the Enterprise Learning Management System (ELMS), and located on the Risk Management Department directory website, under CCSD.net. Contact Risk Management at 799-6496 concerning training needs for topics that are not currently listed.

A. Types of Safety Training / Documentation

Training and instruction should be provided to:

- All new employees
- Employees given new job assignment for which training has not previously been received
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and present a new hazard
- Whenever the employer is made aware of a new or previously unrecognized hazard
- Supervisors to familiarize them with the safety and health hazards to which employees under their immediate direction may be exposed
- Training records maintained for three (3) years

B. New Hire Orientation - CCSD covers the following topics during orientation:

I. Hazard Communication – Employee Right-to-Know, OSHA 29 CFR, Part 1910.1200 (for applicable job classifications)

The purpose of the standard is to ensure that chemical hazards in the workplace are identified and evaluated and that information concerning these hazards is communicated to employees.

II. Bloodborne Pathogens – Exposure Control Plan, OSHA 29 CFR, Part 1910.1030

Employees who may reasonably anticipate contact with blood or other potentially infectious materials in the course of their employment, receive initial training and annual training thereafter to be sure they understand the hazards associated with bloodborne pathogens, the modes of transmission, the

Exposure Control Plan, the regulation, the use and limitations of engineering controls, work practices and personal protective equipment.

III. Employee Right to Know

Annually all employees and every new hire is provided the Employee “Right to Know” in ELMS. ELMS contain information that may be the result of federal law, CCSD policies and regulations, or CCSD procedures. Assigned training is tracked to provide receipt of annual completion to show he or she has been made aware of these rights.

- **Employee Rights and Responsibilities**

Every new hire is provided a copy of the Employee Rights and Responsibilities pamphlet and video, to promote safety in the workplace, in accordance with NRS 618.376. The link can be found at the link can be found at <https://ccsd.net/resources/risk-and-insurance-services/nv-workplace-safety-english.pdf>. This document was developed by the Division of Industrial Relations of Nevada Department of Business and Industry and explains the rights and responsibilities of both employers and employees in creating a safe working environment. **A signed copy of the receipt is kept in the employee’s site personnel file to show he or she has been made aware of these rights and responsibilities.**

IV. Sexual Harassment, Title VII of the Civil Rights Act of 1964, Civil Rights Act of 1991

Employees are advised of Clark County School District Policy 4110 and Regulation 4110 regarding Sexual Harassment. Annually all employees and every new hire is provided the information located in ELMS.

V. General Safety Orientation

No employee should be allowed to start a job until he or she has received appropriate instruction on how to perform their job properly and safely NAC 618.540(1)(c). In addition to informing employees of the safety rules, the following training should be provided to all employees prior to their job assignment:

- Written Workplace Safety Program
- Rights and Responsibilities pamphlet and video per Nevada Law
- Location and Contents of Health and Safety related Documents
- Emergency Action Plans
- Reporting On-the-Job Injuries and Illnesses
- Procedures for On-the-Job Injuries Requiring Medical Treatment
- Hazard Recognition
- Reporting of Hazardous Conditions
- Safe Use of Equipment and Machinery
- Proper Lifting / Material Handling Techniques

C. Job Specific Safety Training

In addition to a general safety orientation, certain employees may receive additional, specific training depending on their work assignments. Supervisors for every department are responsible for being

aware of the job hazards in their area and ensuring that those under their direction receive in-house or contracted to an outside source training. The training must be consistent with the specific hazards to which employees are exposed to. Some of the job specific annual safety training will be in the ELMS assigned by employee.

Training Certification

Supervisors must also document training and communications, whether conducted in a formal type setting (classroom), informal (toolbox), practical (on-the-job), CBT (computer-based training) and quarterly safety meetings.

Specifically, the supervisor must keep records of who was trained, the instructor, date of training, and training topic. Training records should be input into everyone's employee file. ELMS, in addition to job specific training, will have designated annual videos to complete as an employment requirement

Other documentation should include, but not be limited to:

- Acknowledgement of Receipt and Review of Safety Rules
- Rights and Responsibilities pamphlet and video per Nevada Law
- Sign-up sheets
- Safety and Health Checklist for new or transferred employee.
- Copies of written safety examinations
- Performance Evaluations
- Training Certificates
- Training sign-in sheets with printed name and signature of attendees
- Copies of written communications

D. Retraining / Evaluation

The following federal OSHA general industry rules include annual retraining/employee information requirements:

- Access to employee exposure and medical records - 29 CFR 1910.1020(g)(1)
- Bloodborne Pathogens - 29 CFR 1910.1030(e)(2)(ii)(M), (g)(2)(ii)(B)
- Occupational Noise - 29 CFR 1910.95(k)(2)
- Permit-required confined space / rescue - 29 CFR 1910.146(k)(2)(iv)
- Chemical-specific regulations in 29 CFR 1910 Subpart Z require annual retraining
- Portable Fire Extinguishers - 29 CFR 1910.157(g)(2) and (4)
- Respiratory protection - 29 CFR 1910.134(k)(5)

While annual Powered Industrial Trucks (PIT) training is not required, an evaluation of each powered industrial truck operator's performance is required to be conducted after initial training, after refresher training, and at least once every three years. If the evaluation reveals deficiencies in an employee's performance, then refresher training is indicated.

The standard does not require any specific frequency of refresher training for industrial trucks; refresher training must be provided when:

- The operator has been observed to operate the vehicle in an unsafe manner.
- The operator has been involved in an incident (accident) or close-call (near-miss).

- The operator has received an evaluation that reveals that the operator is not operating the truck safely.
- The operator is assigned to drive a different type of truck.
- A condition in the workplace changes in a manner that could affect safe operation of the truck.

VII. ENFORCEMENT OF SAFETY PRACTICES

A system for ensuring that employees comply with safe and healthy work practices has been developed, in compliance with Nevada Administrative Code 618.540. Safety rules and procedures are not only the requirements for regulatory compliance; they are also a reflection of the philosophy, values, and management commitment to the Written Workplace Safety Program and employee safety.

All injuries and accidents are preventable through establishment and compliance with safe work procedures. “Safety starts with me at CCSD”!

Each department is responsible for developing a code of safe work practices. General safety rules should list all types of behavior and actions that will not be tolerated. Job specific rules should detail the proper safety procedures an employee should follow in undertaking any work or operating any piece of equipment. It is advisable that each employee sign documentation stating they have read and understand the safety rules and have received a copy.

Risk Management’s Safety unit will need a copy of your departments general job specific safety rules emailed to safety@nv.ccsd.net.

Approved CCSD standards, procedures, rules, practices and instructions shall be enforced in the same manner as other approved job performance requirements. Safety performance should be considered during annual job performance evaluations.

A. Disciplinary Action Program

CCSD is committed to the fair and equitable treatment of its employees. Disciplinary actions for failure to comply with the established job safety requirements shall be undertaken in accordance with CCSD policies and regulations, and appropriate negotiated agreements.

B. Disciplinary Policy

All safety rules, procedures, and plans in effect at CCSD are intended to be followed for the protection of **ALL** employees. Please review the policy, regulations and all appropriate negotiated agreements for CCSD employees. CCSD Policy 4340, Regulation 4343, Regulation 4342, Regulation 4341. Administration: Article 27, Police: Article 27, Teachers: Article 36, Support: Article 33, and School Police: Article 35.

Management shall take corrective measures as necessary to ensure that safety rules and safe work practices and procedures are not violated. NAC 618.540(1)(e) request a method for ensuring that employees comply with the safety rules and work practices. Initial corrective measures include employee training, instruction and guidance to achieve a positive attitude toward working safely.

Employee safety violations will require mandatory retraining whether conducted in a formal type setting (classroom), informal (toolbox), practical (on-the-job), or CBT (computer-based training).

Documentation will be recommended and requested from Risk Management upon completion. An absence of these records will lead to the conclusion that safety is not a priority.

Unsafe work practices include:

- Failure to use available personal protective equipment
- Failure to use proper lifting techniques
- Failure to watch all required annual assigned training videos completely
- Careless or thoughtless acts
- Horseplay or practical jokes
- Misuse of equipment
- Entrance of unauthorized areas that may cause harm to self or others
- Conducting environmental testing without contacting Environmental services at (702) 799-0990 or environmental@nv.ccsd.net
- An employee under the influence of alcohol or drugs (narcotics or controlled prescription medicines)

VIII. INJURY REPORTING and RECORDKEEPING SYSTEM

A. District wide Emergency Action Plan

Clark County School District is dedicated to the protection of its employees from emergencies such as chemical spills, fires and explosions. When emergencies do occur, our Emergency Action Plan (EAP) is initiated. The EAP is in place to ensure employee safety from emergencies during regular hours and after hours. It provides a written document detailing and organizing the actions and procedures to be followed by employees in case of a workplace emergency.

B. School-based Emergency Operations Plan (EOP)

In addition to the District wide EAP, each site is responsible for completing the School-based Emergency Operations Plan (EOP) and that is **readily available**. The school-based plan is required to be updated **annually** and when changes in staff or the plan occur. Any questions please contact Emergency Management 702-799-HELP (4357).

Additional information for the **Site-Specific, School-based Emergency Operations Plan** can be found in google shared drive 0156 Emergency Management.

C. Injury Reporting Procedures

Our safety and health reporting system ensure the Risk Management Department receives and promptly responds to the injury report, evaluates the report to determine whether an injury or illness has occurred, and takes corrective action as required by OSHA standards. When an employee has experienced signs or symptoms of an injury or illness that arises during their employment, all appropriate documents must be completed. CCSD will have the employee medically evaluated, and maybe at no cost to the employee.

The State of Nevada Department of Business and Industry Division of Industrial Relations Workers' Compensation posters located at your site have information regarding the CCSD preferred urgent care facilities and what you should do if you are injured. If you need assistance you can call the On-site WC Triage Nurse at (702) 799-NURS (6877).

Provide immediate first aid to an injured employee. (NRS 616C.085). First aid kits should be readily available at each worksite.

Regardless of the severity or lack thereof, **ALL** incidents must be reported to the employee's immediate supervisor by the **end of their shift**, and investigated for the purpose of identifying causative factors and corrective measures to avoid recurring; and to comply with State Regulatory Requirements (NRS 616C.015, NRS 616C.045) The supervisor must complete the CCF-99 form. <https://ccsd.net/departments/risk-and-insurance-services/safety-forms> Return the form as soon as practicable, but **no later than** seven days to Risk Management Department.

Also, an incident report C-1 Form will need to be completed by the employee and signed by the supervisor as soon as practicable, but **no later than** seven days.

If medical treatment is sought, the Form C-4 Form must be completed by the treating physician or chiropractor within three working days after treatment. Once your C-4 Form is received by Sierra Health-Care Options they will accept or deny your claim within 30 calendar days. The link for more information and documents can be found at <https://ccsd.net/departments/workers-compensation/>

NOTE: In accordance with the Nevada Law, you may be denied workers' compensation benefits if you fail to file a C-1 form or a C-4 form within the statutory time frame.

- **OSHA 300 Log of Work-Related Injuries and Illnesses**

The OSHA 300 log is used to classify work-related injuries and illnesses and to note the extent and severity of each case. When an incident occurs, specific details about what happened and how it happened will be recorded on the log.

- **For life-threatening conditions** requiring immediate treatment, call 911 or seek treatment at the nearest hospital or emergency room.

Examples of life-threatening conditions:

Loss of consciousness	Poisoning
Spinal injuries	Shock
Major burns	Severe Chest pain

- **Non-emergency injuries** and illnesses. CCSD has partnered with a Managed Care Contract (MCC) with Sierra Health-Care Options (Sierra at Work). The injured employee must be treated at a *Southwest Medical Associates Urgent Care Center*, or choose a **medical provider** listed on the CCSD Risk Management webpage, "On-The Job Injury" link, under the Workers' Compensation section on the Navigation Index. <https://ccsd.net/departments/workers-compensation/> Questions regarding this program should be directed to the CCSD Workers' Compensation Office at (702) 799-0060.

D. Employer Reporting Responsibilities – Nevada OSHA

In the event of a serious injury, illness or fatality, Risk Management Department must report the incident by telephone to the nearest District Office of the Nevada Division of Industrial Relations (Nevada OSHA Enforcement Section). Incidents requiring reporting to the Division within 8 hours (including weekend days), include:

- Fatal injury to an employee, including heart attacks
- Fatality or incident involving 1 or more patient hospitalizations within 24 hours of the incident
- Serious injury or illness to an employee
A *serious injury* or illness is defined as:
 1. Loss of a member of the body (e.g., amputation)
 2. Serious degree of permanent disfigurement (i.e. crushing or severe burn type injuries)
 3. In-patient hospitalization in excess of 24 hours for other than observation

A copy of the supervisor's accident report form, in addition to witness statements should be provided to Risk Management prior to notifying Nevada OSHA.

The report to the agency must also include the following items:

- Time and date of the accident
- Name and job title of the person reporting the accident
- Name of person to contact at site of accident
- Name, birth date, address and telephone number of injured employee(s)
- Nature of injury
- Specific location where the injury occurred, and which medical facility injured employee(s) was transported to
- List and identify other law enforcement agencies present at the site
- Description of the accident and whether the accident scene has been altered

Accidents involving highway or public street motor vehicle accidents need to be reported.

NRS 618.378 Employer required to report **certain** accidents and motor vehicle crashes occurring in the course of employment; investigation of accident or crash by Division of Industrial Relations; insurer to report claimed or reported injuries and diseases; compliance with federal recordkeeping and reporting requirements

1. Any accident or motor vehicle crash occurring in the course of employment which is fatal to one or more employees must be reported by the employer orally to the nearest office of the Division of Industrial Relations within 8 hours after the time that the accident or crash is reported to any agent or employee of the employer.

2. Any accident or motor vehicle crash occurring in the course of employment which results in the inpatient hospitalization of one or more employees, the amputation of a part of an employee's body or an employee's loss of an eye must be reported by the employer orally to the nearest office of the

Division within 24 hours after the time that the accident or crash is reported to any agent or employee of the employer.

3. A report submitted to the Division of Industrial Relations pursuant to the provisions of subsection 1 or 2 must include:

- The name of the employer
- The location and time of the accident or crash
- The number of employees who were hospitalized as inpatients or who suffered fatalities, amputations or loss of an eye as a result of the accident or crash
- The names of the employees who were hospitalized as inpatients or who suffered fatalities, amputations or loss of an eye as a result of the accident or crash
- A brief description of the accident or crash
- The name of a person who may be contacted by the Division for further information

In the event of a Bloodborne Pathogen (BPP) exposure

The names of those who may have come into contact with blood or other bodily fluids, all exposures must be documented and reported to the Employee Health Nurse at 702-799-NURS (6877) for medical surveillance (see Bloodborne Pathogen Program for details). The link for more information and documents can be found at <https://ccsd.net/departments/risk-and-insurance-services/bloodborne-pathogens-category-i-employees>

NOTE: Any equipment involved in the accident/incident must be immediately red-tagged and moved to a secure area for inspection.

Risk Management is responsible for determining whether an independent inspection of the equipment is warranted. Any materials contaminated with blood, such as towels, should be segregated and disposed of properly. OSHA regulates items potentially contaminated with blood borne pathogens.

E. Documentation and Recordkeeping Requirements

Proper recordkeeping is essential for the success of any organization. It enables the company to learn from past experiences and make corrections for future operations. In addition, Federal and State regulatory recordkeeping requirements must be adhered to.

In accordance with 29 CFR Part 1904, within 7 calendar days after information about a work-related case is received, the information will be recorded on the *OSHA Log of Work-Related Injuries and Illnesses* (Form 300) that results in:

- Death
- Loss of consciousness
- Days away from work
- Restricted work activity or job transfer
- Medical treatment beyond first aid

The Director of Risk Management is responsible for compiling the OSHA 300 Log reports and completing the OSHA Form 300A - *Annual Summary of Work-Related Injuries and Illnesses* that must be completed by February 1st for the previous calendar year. CCSD is exempt from posting the reports at each individual site, but has them available upon request.

Risk Management Resources and CCSD Contact Information

For information pertaining to the Written Workplace Safety Program, Safety Committees Guidelines and Safety Trainings contact the Risk Management Department at (702) 799-6496 or visit the website at <http://riskmanagement.ccsd.net>

Clark County School District

District Emergency Operations Center (DEOC)

Emergency Action Number, (702) 799-HELP (702) 799-4357

24 Hour CCSD Police Dispatch, (702)799-5411

Environmental Services, HAZMAT, (702) 799-6496

Student Threat Evaluation and Crisis Management, (702) 799-7449

APPENDICES

- A-1 Supervisors Accident/Incident Investigation Report (CCF-99)
- A-2 Employee Safety, Health or Environmental Concern (CCF-305)
- A-3 Workplace Hazard Assessment Certification and Instructions (RSK-F513)
- A-4 Job Hazard Analysis and Instructions (RSK-F006)

Appendix A-1: Fillable Form

Supervisors Accident/Incident Investigation Report (CCF-99)

Available from CCSD Graphic Arts Center CCF-99

http://graphics.ccsd.net/NewFiles/GAC.2006.Site/PDFs/1-99/99-Supervisor_Accident_Rep.pdf

OR

Fillable form on CCSD Administrative directory under Risk Management, Safety and Insurance Services, Safety, safety forms:

<https://ccsd.net/departments/risk-and-insurance-services/safety-forms>



1996-00009

SUPERVISOR'S ACCIDENT/INJURY/INCIDENT INVESTIGATION REPORT

CCF 99
0000

Dept./School: Loc. #: Address:

Employee Name: Date of Injury/Incident:

Date of Birth: Employment Status: 9 Month 10 Month 11 Month 12 Month
 Part-Time Full-Time Permanent Temporary Probationary

Position Title: Length of Time in Position: Work Shift Hrs:

Was the employee performing regular job duties? If not, explain:

Any recent changes to shift hours? (Explain)

Location of Accident: Day of Week:

Time of Day: Body Part Injured: Type of Injury:

Injury Severity: First Aid Doctor Visit C-1 Completed: Date Completed:
 Emergency Care Fatality C-3 Completed: Date Completed:

Lost Days from Work: Work Restrictions Issued:

Describe in detail what happened:

Did employee receive training in prevention of this type of injury: Training Date:

Describe any equipment damage/estimate cost:

WITNESSES: (Attach written statements. If non-CCSD employee, include work or home address)

Name: Job Title: Telephone:

Name: Job Title: Telephone:

Name: Job Title: Telephone:

Employee's Supervisor at time of injury:

Appendix A-2: Fillable Form Employee Safety, Health or Environmental Concern (CCF-305)

Available from CCSD Graphic Arts Center CCF-305

http://graphics.ccsd.net/NewFiles/GAC.2006.Site/PDFs/300-399/305-Employee_Safety_Concern.pdf

OR

Fillable form on CCSD Administrative directory under Risk Management, Safety and Insurance Services, Safety, safety forms

<https://ccsd.net/departments/risk-and-insurance-services/safety-forms>

Clark County School District		CCF-305 10/19
EMPLOYEE SAFETY, HEALTH, OR ENVIRONMENTAL CONCERN FORM		
Date:	Location Code:	<input type="checkbox"/> Central Office <input type="checkbox"/> School
School/Department: _____		
<small>List Location of the Concern</small>		
Administrator Name at Site of Concern: _____		
Site's Administrator Notified of Concern <input type="checkbox"/> Yes <input type="checkbox"/> No Is the site Safety Committee aware of the concern: <input type="checkbox"/> Yes <input type="checkbox"/> No		
Have attempts to correct been made by site? <input type="checkbox"/> Yes <input type="checkbox"/> No Work order created? <input type="checkbox"/> Yes <input type="checkbox"/> No W/O#: _____		
Description of safety, health, or environmental concern:		
Recommendation for correction of concern:		
List any attempts made to address concern:		
Do you want to be contacted to discuss concern: <input type="checkbox"/> Yes <input type="checkbox"/> No		
Submitters Name (optional): _____		
Contact Information (Include phone and /or e-mail address): _____		
Please e-mail to: Safety@nv.ccsd.net OR Fax to: (702) 799-2995		
		

Appendix A-3: Fillable Form (Image of page #1) CCSD Workplace Hazard Assessment PPE Certification Form (RSK-F513)

NOTE: You may have some hazards that may or may not require the use of (PPE) Personal Protective Equipment. In any case, review the hazards found with your immediate supervisor and determine what can be done about the hazard(s). All hazards identified will be reviewed for engineering controls (Example: Handrails, exhaust systems...) and/or administrative controls (Example: Safety cones, warehouse traffic patterns, signs...) to eliminate or reduce exposure to the hazard(s).

Fillable form available link at: <https://ccsd.net/resources/risk-and-insurance-services/hazard-assessment.pdf>

CCSD Workplace Hazard Assessment PPE Certification		RSK-F513 Form
Survey your workplace as often as necessary to identify safety and health hazards that require personal protective equipment.		
Date <input style="width: 90%;" type="text"/>	Department <input style="width: 95%;" type="text"/>	Location Code <input style="width: 90%;" type="text"/>
Room/Workplace # <input style="width: 90%;" type="text"/>	Facility/School Name <input style="width: 95%;" type="text"/>	Person(s) Performing Assessment <input style="width: 95%;" type="text"/>
Task Being Performed <input style="width: 100%; height: 20px;" type="text"/>		
Name of Equipment and/or Chemical being used. <input style="width: 100%; height: 20px;" type="text"/>		
Manufacturer/Brand <input style="width: 95%;" type="text"/>	Model # <input style="width: 95%;" type="text"/>	Serial # <input style="width: 95%;" type="text"/>
Chemical Hazard <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Identify Hazard(s) <input style="width: 100%; height: 20px;" type="text"/>	
Safety Data Sheet (SDS) Attached? <input type="checkbox"/> Yes <input type="checkbox"/> No	Refer to Safety Data Sheet (SDS) #4 First-Aid measures that describes the initial care that should be given by untrained responders AND #8 Exposure Controls/Personal Protection for measures that can be used to minimize worker exposure.	
Physical Hazard <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Identify Hazard(s) <input style="width: 100%; height: 20px;" type="text"/>	
Operators Manual Attached? <input type="checkbox"/> Yes <input type="checkbox"/> No	Refer to Operator Manual for Safety Considerations and required Personal protective equipment (PPE).	

Appendix A-4: Fillable Form (Image of page #1) CCSD Job Hazard Analysis (RSK-F006)

NOTE: Job Hazard Analysis (JHA) establishes a method for analyzing potentially dangerous jobs for the purpose of creating a Standard Operating Procedure (SOP) for safety. Directors/Administrators shall require the development of a JHA for all hazardous jobs performed by their employees. The JHA shall be updated whenever the job changes or procedure deficiencies are noted.

Fillable form available link at: <https://ccsd.net/resources/risk-and-insurance-services/jha.pdf>

CCSD Job Hazard Analysis (JHA)
RSK-F006 Form

Use this job hazard analysis (JHA) that identifies potential physical, chemical, biological or other hazards for EACH work task.

Date <input style="width: 100%;" type="text"/>	Skill, role or task being assessed <input style="width: 100%; height: 20px;" type="text"/>	Location Code <input style="width: 100%;" type="text"/>
Description of Work/Job Task <div style="border: 1px solid black; height: 60px; width: 100%;"></div>		Name of Supervisor & Employee conducting JHA <input style="width: 100%; height: 20px;" type="text"/>

Check ALL that apply that identifies as potential hazards

<input type="checkbox"/> Impact from a falling or flying object <input type="checkbox"/> Skin Irritants (a substance that causes inflammation of the skin) <input type="checkbox"/> Falls from elevated work platform,ladder,stairs <input type="checkbox"/> Repetitive Motions <input type="checkbox"/> Adjacent/Surrounding Work Hazards <input type="checkbox"/> Lifting Hazards <input type="checkbox"/> Shoring (Soil collapse?) <input type="checkbox"/> Caught in or between a stationary/ moving object <input type="checkbox"/> Sloping (Site conditions such as steepness?) <input type="checkbox"/> Fire or Explosion Potential <input type="checkbox"/> Compressed Gasses/Liquid <input type="checkbox"/> *Welding/Burning Operations <input type="checkbox"/> Pinch, Crush or Striking Hazards <input type="checkbox"/> Lead Exposure (Paint, Plumbing, Automotive, Mechanical) <input type="checkbox"/> Confined Space	<input type="checkbox"/> Difficult Access (Roofs, Water Heater closets, Solar Panels, Cooling Towers, Drop Ceilings, Chase ways) <input type="checkbox"/> High Noise Levels <input type="checkbox"/> Ionizing Radiation (Gamma rays, X-rays, and the higher ultraviolet part of the electromagnetic spectrum) <input type="checkbox"/> Excavation and Trenches Hazard <input type="checkbox"/> Elevated Loading or Working tasks <input type="checkbox"/> Inadequate Ventilation <input type="checkbox"/> Water/Drowning Hazard <input type="checkbox"/> Employees/New or Temp <input type="checkbox"/> Sharp Edges or Hot/Cold Surfaces <input type="checkbox"/> Lacerations, Punctures by sharp objects <input type="checkbox"/> Hazardous Chemical Exposure (Review the Safety Data Sheets (SDS)) <input type="checkbox"/> Electrical Shock/Energized Equipment Hazards <input type="checkbox"/> Power Tool Hazards <input type="checkbox"/> Potential Release of Energy Kinetic/Gravity <input type="checkbox"/> Roadway/Parking lot Traffic
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Note: *A Supplemental HOT WORK Permit is required for all Welding and Burning operations.

The CCSD Manager/Supervisor will select an experienced employee to be observed while correctly performing the job tasks.

- Brief the employee on the purpose of the analysis.
- Observe the person performing the job and break it down into recordable steps.
- Record each step using an action verb, e.g., pick up, lift, push, etc. to describe each step.
- Check the steps with the employee performing the job for verification.

Identify all actual or potential environmental safety and health hazards associated with each task without regard to any controls in place. Examples of questions that should be addressed:

- Can employee be caught in/or between moving objects?
- Can muscle strain result from pushing, pulling, lifting, bending, or twisting?
- Is there potential for a slip, trip, or fall?
- Is the environment unsafe due to darkness, dust, toxic gases, vapors, fumes, or poor housekeeping?
- Is there a danger of striking against or being struck by objects?

Determine and record the recommended action(s) or procedure(s) for performing each step that will eliminate or reduce the hazard, e.g., engineering change, job rotation, personal protective equipment (PPE), etc. The priorities in eliminating or reducing hazards that have been identified are:

- Find a new way or procedure to do the job.
- Change the physical conditions that create the hazard(s).
- Reduce the necessity or frequency of doing the job.
- Use PPE.