



## Injury and Illness Prevention Program

Innovative Employee Solutions

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Innovative Employee Solutions (IES) designates an Injury and Illness Prevention Program (IIPP) Administrator who is responsible for the implementation and ongoing management of this program. The IIPP Administrator has the authority and responsibility to ensure compliance with all safety regulations and to oversee efforts to prevent workplace injuries and illnesses.

Our IIPP Administrator is:

**Tanya Athniel**  
**HR Lead, Compliance and Safety**  
**tathniel@innovative-es.com**  
**(858) 715-5100 x114**

All managers and supervisors are responsible for implementing and maintaining the IIPP within their respective work areas.

The responsibility for reviewing a client's IIPP to ensure it covers and protects our assigned employees may very depending on the client and worksite; however, all employees are informed of the designated health and safety contact within our agency, as well as the individual(s) responsible for the health and safety at the client's worksite(s).

## Accident/Exposure Investigations at Client Worksites

IES requires our client employers to promptly notify us in the event of any accidents, serious injury, serious illness, or hazardous substance exposure involving one of our employees assigned to their workplace. Additionally, clients are expected to share the findings of any related incident investigations with us. This requirement is outlined in our service agreement, which states that IES must be notified immediately if one of our employees sustains a serious injury.

IES actively participates in incident investigations conducted at client worksites, working collaboratively with host employers to identify root causes and prevent future occurrences.

As the employer of record, we recognize our responsibility to report to Cal/OSHA or OSHA within eight hours of any fatality, serious injury or illness requiring hospitalization for more than 24 hours, amputation, or other significant disfigurement involving one of our employees placed at a client's worksite. The host employer also bears responsibility for making this notification.

## Hazard Assessment and Inspection of Client Worksites

We conduct an initial safety inspection of client worksites in light industrial and medical settings prior to placing employees. Periodic inspections are also conducted to identify unsafe conditions and work practices. These inspections occur when new substances, processes, procedures, or equipment are introduced that may present a new safety or health hazard, or whenever we become aware of a previously unrecognized hazard.

Hazard assessments and inspections are conducted by:

**Tanya Athniel, HR Lead, Compliance and Safety**

We also require our client employers to promptly notify us when any changes occur in their workplace that could impact the health or safety of our employees. This includes the introduction of new substances, procedures, or equipment, as well as any modifications to our employees' job duties that could pose new risks.

Employees placed at client worksites are informed of their right to report hazards or unsafe conditions to either the client employer, IES, or both. They are provided with clear instructions on how and to whom such reports should be made. Employees may report concerns by contacting us via telephone or by submitting an email through our website.

Additionally, employees are advised of their right to refuse work assigned by a client employer if they reasonably believe it presents a danger or violates safety policies. This right may be exercised without fear of termination, discipline, or retaliation, provided the refusal is made in good faith under the circumstances described above.

## **Hazard Correction at Client Worksites**

To protect our employees placed in client workplaces from health and safety hazards, IES implements the following measures:

- Conducting worksite safety evaluations prior to placement and as needed
- Requiring host employers, in accordance with our service agreements, to provide our employees with training on hazard communication, workplace safety, and the proper use of tools and equipment

We also ensure that our employees are provided with any required personal protective equipment (PPE) or protective clothing necessary for the tasks they are assigned.

In situations where an imminent hazard is identified at a client worksite and cannot be immediately corrected without posing a risk to employees or property, we will take immediate action to remove all affected employees from the area until the hazard has been effectively addressed.

## **Communication with Employees Working at Client Worksites About Safety**

All IES managers and supervisors are responsible for effectively communicating occupational health and safety information to employees in a manner that is clear and understandable. For employees placed in client workplaces, we address safety communication through the following methods:

1. Employees are informed that they have the right to refuse any task assigned by a client employer if they reasonably believe it poses a danger or violates IES or the client's safety policies. They are

assured that they will not be disciplined, sanctioned, or terminated for reporting hazards or refusing unsafe work under these conditions.

2. When unsafe or unhealthy conditions, practices, or procedures are identified in a client workplace, IES communicates directly with the client's designated Safety or Human Resources contact via telephone and email.
3. Employees are encouraged to report safety concerns without fear of retaliation. Reports may be submitted in the following ways:
  - Through the [\*\*Reporting a Health or Safety Concern\*\*](#) section of our website
  - By contacting IES Human Resources via email at [\*\*humanresources@innovative-es.com\*\*](mailto:humanresources@innovative-es.com) or via telephone at **858-715-5100 x164**
  - By fax at **858-715-5110**
4. Our communication system includes:
  - General safety information provided during the hiring process
  - General safety training during employee onboarding
  - Distribution of safety updates and resources through:
    - The employee center on our website
    - Email communications to new employees
    - The Injury and Illness Prevention Program (IIPP) posted on our website
5. Our service agreements with client employers clearly outline how IES, the host employer, and employees will communicate regarding safety matters to ensure alignment and prompt resolution of any concerns.

## **Training and Instruction for Employees Working at Client Worksites**

All employees, including supervisors and those placed at client worksites, receive training and instruction on both general and job-specific health and safety practices through the following measures:

1. During the hiring process, IES provides new employees assigned to client worksites with online health and safety training. This training includes:
  - An overview of IES health and safety policies and procedures
  - A review of our Injury and Illness Prevention Program (IIPP)
  - Instructions on how to report workplace health and safety concerns
2. We ensure that employees receive site-specific, job-specific, and hazard-specific training before beginning work at a client location. This training may be provided by IES or the client employer, depending on the assignment. Additional training is required whenever:
  - New substances, equipment, processes, or procedures are introduced
  - Employees are assigned to tasks involving new or previously unrecognized hazards

3. Our service agreements with client employers clearly define the respective responsibilities of IES and the host employer regarding training content, timing, and delivery. To help ensure compliance and effectiveness, we follow up with employees via a survey to confirm that appropriate training was received.

## Employee Compliance with Safety Procedures

Management is responsible for ensuring that all safety and health policies – both those established by IES and those implemented by our client employers – are clearly communicated to employees.

All employees, including those assigned to client worksites, are expected to follow safe and healthful work practices. Our system for promoting and ensuring employee compliance includes the following components:

### 1. Recognition of Safe Work Practices

Because employees are directly supervised by the host employer, we delegate the responsibility for recognizing and providing feedback on safe work practices to the client. This may include verbal recognition, performance feedback, or other forms of acknowledgment.

### 2. Corrective Action and Disciplinary Process

When we are notified by the host employer or another employee of noncompliance with safety policies, we follow a fair and consistent process. This includes:

- Providing retraining, either directly or in coordination with the client employer, to address performance deficiencies
- Taking appropriate disciplinary action based on the severity and frequency of the noncompliance

### 3. Employee Responsibilities

All employees are expected to:

- Immediately report unsafe conditions, unsafe work practices, and accidents to both IES and the client site supervisor
- Follow all applicable safety rules and procedures
- Use required personal protective equipment (PPE) as instructed by their supervisor

These expectations are communicated during onboarding, training, and through ongoing communication while the employee is on assignment.

## Recordkeeping and Documentation

This written Injury and Illness Prevention Program (IIPP), along with any supporting attachments, outlines how IES implements and maintains workplace health and safety standards for employees placed at client worksites. A copy of this IIPP is available to employees through the IES employee portal:

<https://worksite.innovativeemployeesolutions.com/login>

We maintain detailed records of all worksite inspections, including those conducted at client locations. These records include:

- The name(s) of the individual(s) who conducted the inspection
- A description of the hazards identified
- The corrective actions taken to address each hazard

These records are retained in accordance with applicable regulatory requirements and are available for review upon request.

## Infectious Disease

Our service agreements with our host employers outline our expectation that they will provide necessary worksite-specific training to IES employees, including training related to infectious disease prevention and response.

IES has also communicated to all client employers the importance of notifying us promptly if any IES employee requires leave due to an infectious disease, including COVID-19, so that appropriate support and compliance measures can be taken.

All employees are responsible for contributing to a safe and healthy work environment by:

- Using safe work practices
- Following all applicable directives, policies, and procedures
- Cooperating with efforts to prevent the spread of infectious diseases in the workplace

## Infection Prevention Measures

Infectious diseases, including COVID-19, are recognized hazards in the workplace and are addressed through our Injury and Illness Prevention Program (IIPP). When implementing prevention measures and identifying or correcting related hazards, IES reviews and follows applicable orders and guidance issued by the State of California and local health departments that have jurisdiction over the client worksites hosting IES employees.

We have provided our host employers and employees with the following infection prevention measures:

- Employees are instructed to stay home if they are feeling unwell. Those who develop symptoms at work should be sent home or referred for medical evaluation.
- Employees exhibiting symptoms of respiratory illness, including COVID-19, should follow CDC guidelines before returning to work, including:
  - Being fever-free for at least 24 hours without the use of fever-reducing medication
  - No acute respiratory symptoms
  - At least 10 days having passed since symptoms first appeared

- Employees and host employers are provided with information on paid sick leave, disability benefits, and paid family leave options.
- IES has encouraged and supported telework arrangements where feasible.
- Guidance provided to host employers includes:
  - Use of EPA-approved disinfectants
  - Availability of EPA-registered disposable wipes for employees to clean high-touch surfaces
  - Adherence to manufacturer's instructions regarding safety, PPE requirements, concentration, and contact time
  - Maintaining adequate supplies to support cleaning and disinfection protocols
- Host employers are instructed to follow CDC and local health authority guidance when an employee is confirmed to have a respiratory illness, including COVID-19. At our corporate office, IES follows CDC and Cal/OSHA guidelines and San Diego County protocols in such cases.
- Host employers have been advised to follow current CDC travel recommendations.

## Training on Infectious Disease Prevention

IES has provided comprehensive COVID-19 training to both our contingent workforce and corporate employees that includes:

- **COVID-19 Awareness**
  - General overview of COVID-19 symptoms
  - When to seek medical attention
  - How the virus spreads, including from individuals who are asymptomatic
  - Workplace procedures for minimizing the risk of transmission
- **Use of Face Coverings**
  - CDC guidance recommending the use of face coverings when around others
  - How face coverings help protect others when used with physical distancing and hand hygiene
  - Clarification that cloth face coverings are not personal protective equipment (PPE) and do not protect the wearer from COVID-19
  - Instructions for proper handling, including washing or sanitizing hands before and after use and laundering face coverings after each shift
- **Hygiene Practices**
  - Proper cough and sneeze etiquette
  - Handwashing with soap and water for at least 20 seconds, especially after interacting with others or touching shared surfaces
  - Avoiding contact with eyes, nose, and mouth with unwashed hands

- Not sharing personal items such as dishes, cups, utensils, or towels
- **Workplace Sanitation and Supplies**
  - Availability of tissues, no-touch trash receptacles, and hand sanitizer for employee use
  - Safe use of cleaning and disinfecting products in a manner that protects employee health, including adherence to manufacturer guidelines and safety instructions

This training is designed to support a safe work environment and align with guidance from the CDC and applicable public health authorities.

## Investigation of on Infectious Disease at the Worksite

IES has advised all host employers to notify us promptly of any confirmed COVID-19 cases involving our employees at their worksites. Host employers are expected to investigate and respond to such cases using the following procedures:

- Determine the date and time the COVID-19 case was last present at the worksite
- Identify the date of the individual's positive COVID-19 test or diagnosis
- Confirm the date on which the COVID-19 case first experienced symptoms (if applicable)
- Effectively identify individuals with COVID-19 symptoms while on-site and ensure prompt response
- Encourage all employees to self-report symptoms and stay home if they are feeling unwell

## Response Procedures for Infectious Disease Cases

To prevent further workplace exposure, host employers must take immediate action, including:

- COVID-19 positive individuals must be excluded from the worksite in accordance with California Code of Regulations (CCR), Title 8, Section 3205.1:
  - Employees who test positive but do not develop symptoms must remain out of the workplace for the duration of the infectious period.
  - Employees with symptoms may return to work after the shorter of:
    - The full infectious period, or
    - Five days from symptom onset, provided at least 24 hours have passed since a fever of 100.4°F or higher resolved without the use of fever-reducing medications.
  - All COVID-19 cases must wear a face covering in the workplace for 10 days following symptom onset or, if asymptomatic, from the date of the first positive test—regardless of vaccination status or prior infection.
- If a local or state health authority issues an isolation, quarantine, or exclusion order, the employee may not return to the worksite until the required period has been completed or the order is officially lifted.

- Host employers should refer to current California Department of Public Health (CDPH) guidance for managing employees who have had close contact with a confirmed COVID-19 case, including any applicable quarantine, testing, or masking requirements.

When IES excludes an employee from the workplace due to COVID-19 illness or close contact, we will provide the following information on applicable COVID-19-related benefits.

- Legally mandated sick leave
- Workers' compensation
- Local government assistance
- Company policies and any contractual leave benefits

## Testing

IES has advised all host employers to provide free COVID-19 testing to any employee, including IES employees, who has had a close contact exposure in the workplace.

## Face Coverings

Employees may voluntarily wear a face covering, including a respirator, even when not required—unless doing so creates a safety hazard as determined by the employer.

Employees are not required to wear face coverings under the following circumstances:

1. **When alone** in a private room or vehicle
2. **While eating or drinking**, provided employees are:
  - Separated by at least six feet from others
  - In a space with maximized ventilation (e.g., increased outdoor or filtered air, if indoors)
3. **When wearing a respirator** as required by the employer and in accordance with Cal/OSHA regulations (CCR, Title 8, Section 5144)
4. **Medical or disability-related exemptions**, including:
  - Employees with a verified medical or mental health condition, or disability that prevents the use of a face covering
  - Employees who are hearing-impaired or communicating with someone who is hearing-impaired
  - In such cases, employees should wear a non-restrictive alternative (e.g., a face shield with a drape), if permitted by their condition
5. **When performing specific tasks** that cannot feasibly be completed while wearing a face covering.  
This exception only applies during the time the task is being performed.

## Respirators

IES will provide respirators to employees for voluntary use upon request, particularly for those working indoors or in vehicles with more than one person.

Employees who request respirators will:

- Be encouraged to use them in accordance with health and safety best practices
- Be provided a properly sized respirator
- Receive training that includes:
  - How to correctly wear the respirator
  - How to perform a user seal check following the manufacturer's instructions each time the respirator is worn
  - Information that facial hair may interfere with the proper seal of the respirator, reducing its effectiveness

This approach ensures employees have access to added protection while working in shared or enclosed environments, even when respirator use is not mandatory.

## Ventilation

IES has advised all host employer worksites to follow current ventilation guidance issued by the California Department of Public Health (CDPH) and Cal/OSHA. This includes reviewing and implementing recommendations from the CDPH Interim Guidance for Ventilation, Filtration, and Air Quality in Indoor Environments.

Host employers are expected to develop, implement, and maintain effective ventilation strategies to reduce the risk of respiratory virus transmission. These may include one or more of the following measures:

- Increase the intake of outdoor air to the extent feasible, except in situations where:
  - The EPA Air Quality Index (AQI) exceeds 100 for any pollutant, or
  - Opening windows or increasing outdoor air would pose a safety hazard to employees (e.g., due to extreme heat, cold, or other environmental risks)
- In buildings with mechanical ventilation, air should be filtered using filters rated at Minimum Efficiency Reporting Value (MERV) 13 or higher if compatible with the existing system. If MERV-13 filters are not feasible, use the highest filtration level the system can support.
- In indoor areas where employees spend extended periods and where ventilation is inadequate, host employers should use High Efficiency Particulate Air (HEPA) filtration units, following the manufacturer's specifications.

These measures are critical to maintaining safe indoor air quality and reducing airborne transmission of respiratory viruses.

## Resources

For additional information on emergency preparedness, infection prevention, and health and safety protocols, employees and host employers are encouraged to visit the [Emergency Preparedness and Infectious Disease](#) section of our website.

**Additional sources of guidance and information include:**

- [Federal Occupational Safety and Health Administration \(OSHA\)](#)
- [Centers for Disease Control and Prevention \(CDC\)](#)
- [California Department of Public Health \(CDPH\)](#)
- [California Division of Occupational Safety and Health \(Cal/OSHA\)](#)

These resources offer up-to-date information on workplace safety regulations, disease prevention guidelines, and public health recommendations.