



# POLK COUNTY COMMISSIONERS COURT

January 31, 2002

9:00 A.M.

Polk County Courthouse, 3rd floor

Livingston, Texas

2002-010

VOL. 48 PAGE 85

**NOTICE** is hereby given that a Special meeting of the Polk County Commissioners Court will be held on the date stated above , at which time the following subjects will be discussed;

1. CALL TO ORDER.
2. WORKSHOP HELD WITH TEXAS ASSOCIATION OF COUNTIES(TAC) AND POLK COUNTY ELECTED OFFICIALS & DEPARTMENT HEADS FOR THE PURPOSE OF INITIATING THE TAC SAFETY INCENTIVE PROGRAM IN ALL COUNTY DEPARTMENTS.

ADJOURN

Posted: January 28, 2002

Commissioners Court of Polk County, Texas  
By: John P. Thompson, County Judge

I, the undersigned County Clerk, do hereby certify that the above Notice of Meeting of the Polk County Commissioners Court is a true and correct copy of said Notice and that I posted a true and correct copy of said Notice in the Polk County Courthouse at a place readily accessible to the general public at all times on Monday, January 28, 2002 and that said Notice remained so posted continuously for at least 72 hours preceding the scheduled time of said Meeting.

BARBARA MIDDLETON, COUNTY CLERK

BY: Deputy

FILED AND RECORDED  
OFFICIAL PUBLIC RECORDS,  
POLK COUNTY, TEXAS  
2002 JAN 28 AM 9:15  
  
BARBARA MIDDLETON  
COUNTY CLERK, POLK CO.



# TEXAS ASSOCIATION OF COUNTIES

1204 San Antonio • Austin, TX 78701

P.O. Box 2131 • Austin, TX 78768-2131

Sam D. Seale • Executive Director



January 21, 2002

The Honorable John Thompson  
 Polk County Judge  
 101 West Church St.  
 Livingston, Texas 77351

Dear Judge Thompson:

I would like to inform you that I met with John McDowell, your Emergency Management Coordinator, and Mrs. Judy Isaacs Polk County Personnel Officer on Tuesday, January 15, 2002. During our visit we discussed the Texas Association of Counties 2002 Safety Incentive Program.

As you may know Polk County is eligible to participate in our Safety Incentive Program. Successful implementation of the program criteria may provide Polk County an estimated saving of \$8,497.00.

As part of the program requirements we are asking all participating counties to attend a workshop to discuss the Safety Incentive Program Criteria. I would like to invite all members of Commissioners Court, and Department Heads to a workshop to discuss the program. The goal of the meeting is to help Polk County prepare to complete the 2002 Safety Incentive Program criteria.

With the cooperation of Mr. McDowell we decided to schedule a meeting for January 31, 2002 at 9:00 a.m. The location of the meeting is yet to be determined by Mr. McDowell. Your participation will be appreciated.

I would like to ask for your assistance in making sure all affected personnel is informed of this meeting. If you have any questions regarding this letter please call me at 1-800-456-5974 ext. 83 or at [ernestog@county.org](mailto:ernestog@county.org).

Sincerely,

Ernesto Galindo  
 Texas Association of Counties Safety Specialist

cc: Honorable, Robert Willis Commissioner  
 Honorable, Bobby Smith Commissioner  
 Honorable, James Purvis Commissioner  
 Honorable, R. R. Hubert Commissioner  
 Honorable, Billy Ray Nelson Sheriff  
 John McDowell, Emergency Management Coordinator

# 2002 Safety Incentive Program Guide



**Texas Association  
of Counties**

1204 San Antonio Street, Austin, Texas 78701 Phone: 800/456-9974

## Texas Association of Counties Safety Incentive Program Guide

This guide is intended to help Texas counties eliminate and control hazards. The materials in this guide will provide you with tools and ideas to incorporate the Accident Prevention Plan (APP) as part of your standard operating procedures. Regardless of the size of your county, we are confident that these elements will help you control the costs and suffering associated with work-related injuries.

Maintaining a safe work environment can have a positive effect on productivity and operating costs. When you prevent or minimize an accident your county maximizes on operating efficiency and decreases operating costs. Every year, counties around the state suffer losses of equipment and property damage as result of work related accidents. In some cases the losses are extremely severe, such as the loss of lives.

An effective Accident Prevention Plan can benefit your county's bottom line. First, safety awareness may help you prevent the loss of lives. Second, safety awareness may also prolong the life of your equipment. Third, a high number of work-related accidents could force your county to pay higher insurance premiums.

This guide explains how to effectively develop and perform each program component. The end result will depend on what you do with this guide, and how well you implement your Accident Prevention Plan.

The results will vary from county to county; however, we have identified those counties with strong managerial support and participation to be the counties with better results.

### 2002 Safety Incentive Program Timeline

Safety Audit Workshops	February 22, 2002 ✓
Adopted Resolutions	March 1, 2002 ✓
Final Plan	April 26, 2002
Mid-Summer Inspection	by July 26, 2002
Final Audit	September 30-October 31, 2002

### **Management Element**

Experience has shown that sincere commitment and active participation by management are necessary if an Accident Prevention Plan is to achieve the beneficial results. When management demonstrates genuine interest in preventing accidents and providing a safe workplace, supervisors and employees are more likely to do the same.

It is vital for the success of the APP that we have participation of Commissioners' Court, members of management, and also the unconditional participation of middle management, such as your foremen and supervisors.

Management should demonstrate active participation by translating ideas into specific safety actions such as:

- ✓ • Adopting a court resolution supporting the Accident Prevention Plan
- Developing and implementing a Safety Policy
- Developing and implementing an Accountability Policy
- Providing realistic allocations of time and money for safety items
- Assigning responsibility and authority for implementing and enforcing your Accident Prevention Plan
- Reacting promptly to recommendations developed as a result of the Accident Prevention Program (suggestions, complaints, etc.)
- Attending safety talks and meetings

### **Implementation of the Plan**

Over the years the Texas Association of Counties has encouraged Texas counties to organize safety committees to develop and implement safety programs. Some counties have opted to assign Loss Control Coordinators or Risk Managers to perform this task.

We feel this decision should be left to the discretion of the county; however, we do recommend appointing one individual to:

- Oversee the development of the APP
- Coordinate the implementation of the APP
- Discuss the status of the development and implementation of the APP with members of Commissioners' Court and other members of management on a monthly basis

**Goals**

An Accident Prevention Plan is more likely to accomplish the desired results when safety goals have been clearly established. Goals should give a clear understanding of what you expect. These goals should be realistic and easy for your Coordinator to measure.

**Safety Policy**

A Safety Policy statement will help you develop employee awareness. Develop a good policy that will help you communicate your intent. The policy should be part of your Accident Prevention Plan. In addition, you may take a copy of the signed policy and place it in a visible location for everybody to see.

**Authority and Accountability**

The authority and accountability policy will help you communicate to all county employees' that the responsibility of implementation and success of the plan falls in the hands of every county employee.

**Management Checklist**

Have you adopted a court resolution? yes no

Have you developed and adopted a safety policy statement? yes no

In the policy statement, or in a separate section of the plan,  
have you appointed an individual (by position) who would be  
responsible for:

Accident Prevention Plan development? yes no

Implementation of the plan? yes no

Enforcement of the plan? yes no

Timeline for progress updates by the designated person? yes no

**Recordkeeping Element**

Recordkeeping is a necessary function of managing your Accident Prevention Plan. Records provide written documentation of your actions and assist you in administering your program components, as well as meeting the Texas Association of Counties' audit criteria

In order for the county to be able to receive credit for their safety efforts, the county must provide documentation to support the implementation of the seven elements.

Records will be reviewed during the mid-summer and final audit review. As part of this package, the Association will furnish all participating counties with sample forms and policies that may be used for the documentation of the seven elements. Some forms or policies may not completely represent the current practice by the county. Therefore we encourage sample forms to be customized to represent the specific county's needs. It is the responsibility of the county to modify the necessary forms, and policies.

The recordkeeping policy must outline where the records are to be kept, who will keep the records, where and how long the records will be maintained. Five years is the recommended time period for maintaining records, unless otherwise required by the individual county.

**Recordkeeping Checklist**

Have you designated the records to be kept as part of the audit program? **yes no**

Have you designated a person(s) to maintain your records? **yes no**

Have you stipulated where the records will be maintained? **yes no**

Have you determined what forms will be used to document:

Personal Injury? **yes no**

Accident Investigations? **yes no**

Building Inspections **yes no**

Vehicle & Equipment Inspections? **yes no**



### **Safety Analysis Element**

A Safety Analysis policy will assist counties to study data to determine trends or identify problem areas. The analysis should be presented in the form of a report. The report will allow you to concentrate on areas of your business that pose the greatest threat to the health and safety of your employees.

The Safety Analysis Report should help managers identify areas within the county or within their respective departments with the highest exposure or frequency of accidents.

Trend Analysis is used to identify trends indicated by statistical data gathered from other program components. By keeping accident and injury data, you can identify particular types of injuries, and the causes of the injuries. Inspection data may reveal problem areas or particular hazards that continually recur. The trend analysis may indicate the need for additional training, new procedures, or engineering controls to eliminate the problems.

### **Accident Log**

Accident logs are recommended as part of the analysis element. The log will facilitate the analysis process. As a minimum the log should maintain:

- Areas where accidents are taking place
- Type of injuries (sprain, strains, lacerations, etc.)
- Nature of injuries (pulling, pushing, etc.)

The log may provide a quick look at the county's current experience. The idea is to identify the trends before they continue to cause more injuries to employees.

### **What is Included in the Analysis Policy?**

- To formulate the analysis component, what do you need to establish in writing?
- Who (by position) is responsible for conducting the analysis?
- What type of analysis will be conducted?
- How often the analysis will be conducted?
- What data will be analyzed?

**Why Conduct a Safety Analysis?**

Mistakes or errors that result in employee injuries, loss time or damaged equipment affect the county's productivity. A simple analysis can help you obtain maximum efficiency, safety, and productivity.

**How is the Analysis Conducted?**

- Select the data to be analyzed (accidents and injury data or hazards identified during inspections)
- Determine a time period the analysis will cover (monthly, bi-monthly)
- Identify similarities in data (three out of four accidents involved back injuries from same work area, three out of four involved same work activity, same hazards identified during the inspection)
- Develop corrective measures to stop the unfavorable trends

**Job Safety Analysis**

JSA is another tool that may be used to better understand the hazards associated with everyday operations.

A Job Safety Analysis outlines the steps involved in a persons occupation, it helps your county identify the hazards with the respective occupation and corrective actions that may help you accomplish the task more safely and efficiently.

Some solutions identified during the JSA may take form of physical changes that minimize or control job hazards; for example, using machine guards. Other solutions can consist of changes in job procedures that eliminate or minimize hazards; for example, pilling materials more safely. Your Texas Association of Counties Safety Specialist may be able to assist you with a more detailed JSA training.

**Analysis Checklist**

- |   |     |    |
|---|-----|----|
| Has an individual been appointed to conduct the analysis?                     | yes | no |
| Have you decided on the frequency and the time frame the analysis will cover? | yes | no |
| Have you decided what type of analysis to conduct?                            | yes | no |
| Has the date for the analysis been identified?                                | yes | no |

## **Safety Training Element**

Employee training is your most valuable accident prevention tool to develop employee safety awareness. Through training, your employees learn to recognize and eliminate hazards. Training may also influence the employees' behavior. The wrong behavior or attitude may lead to work related accidents. After all, 80 to 90% of all accidents are attributed to human behaviors.

Many accidents can be avoided if the employees are shown safe work practices and made aware of the hazards of the job. You may use other elements of the program to develop a training schedule for your county or department.

### **The Supervisor**

Supervisor's participation in employee training is vital for the prevention of work related accidents, and with your support and guidance they can have a direct impact on the reduction of workplace accidents.

### **The Employee**

County employees are busy personnel, who are exposed to a variety of tasks within their respective departments; therefore, it is important that they are presented with the correct tools and education on how to accomplish tasks safely and effectively.

### **New Employees**

New employee orientation should be in writing and it should include safety information. In addition, new employees may be provided with a tour the work area explaining the operations, processes and equipment. Explain hazards that could lead to injury and the safety precautions to prevent injury.

When developing the Training Policy, the following information must be specified:

1. Indicate, by position, who will be responsible for conducting the training. When selecting the designated trainer, take into consideration that they will have to train on a variety of topics, specific to their respective areas. Therefore, we recommend appointing individuals that are knowledgeable of the department operations, policies, and the hazards associated with county operations.
2. How often training will be conducted depends on the exposure of the department. Some departments, by the nature of their responsibilities, have higher risk exposures than others. Consequently, these departments will require additional training throughout the year to maintain a high level of awareness. Road & Bridge and Sheriff's Departments will be expected to conduct training on a monthly basis for the purpose of the audit program.

3. Some counties like to adopt a core of training topics for the year. Unfortunately, sometimes these topics do not address some of the factors contributing to work-related accidents. We recommend that the county conduct an analysis of the most common type of injuries over the past two years to identify developing trends. The training schedule should reflect the specific county needs. Some areas may need specialty training to address their safety needs.

### **Who Needs Training?**

Everybody needs training. New employees need training to get off on the right foot. Existing employees need constant training to remind them of the hazards associated with their jobs, and remind them of the county's standard operating procedures. Also, existing employees who change jobs require training to perform their jobs more efficiently and safely.

Additional consideration should be given to those employees working in more hazardous situations, such as those assigned to activities with strenuous manual labor, heavy lifting, pulling or pushing.

Supervisors need specific management techniques that may help them implement and enforce the Accident Prevention Plan. Supervisors need training analyzing jobs to identify unsafe acts and conditions that may lead to work-related accidents.

### **Who Should Conduct the Training?**

Over the years, counties around the state have relied on the services provided by the Texas Association of Counties or other outside agencies for their training efforts. Unfortunately, due to the increase demand for training over recent years, we can no longer provide all necessary training required to maintain a high level of safety awareness. Therefore, we are committed to training personnel within the county that may be able to provide all the training necessary training to meet the audit criteria.

The Association has an extensive safety resource library, which is able to accommodate a number of topics related to county operations. We recommend to all participating counties to allow personnel within the county to become trainers. "Train the Trainer" instruction will allow the trainer to expand their knowledge on training techniques so they can maximize their training sessions. Your Texas Association of Counties Safety Representative can assist you with this.

### **New Employee Orientation**

As previously mentioned, new employee orientations are important to get new employees off on the right foot. As part of the written orientation program, you should consider the following:

- Discuss the county's policy and dedication to safe and healthy work environment
- Provide a copy of the county's rules and procedures to employees, and discuss any questions or particular items of interest with the employee including accident reporting, hazard reporting, etc.
- Discuss the Accident Prevention Plan with the employees
- Supply employees with any personal protective equipment needed to perform the job. Include instruction on its proper use, adjustment, maintenance, and replacement procedure.
- Discuss and provide training on specific hazards of the employees' jobs. A JSA is a good tool to help prepare and present this training.
- Take employees on a tour of the county and your respective departments

### **What is Considered Safety Training for the Purpose of the Safety Audit Incentive Program?**

Safety training for the purpose of the safety incentive program should include topics on matters affecting county employees' health and safety, with an emphasis on most recent injury experience (minimum last two years).

### **Safety Videos**

Safety videos are a good source for safety training; however, a video will not be capable of addressing all the specific needs of the department. Therefore, we will expect personal involvement by the immediate managers and supervisors to complement video presentations.

### **Job Related Discussions**

Job related discussion will be considered training sessions if they discuss safety-related matters, i.e. "sexual harassment" although an important matter, is not considered safety related.

The following are considered job-related discussions:

- Discussion of county or department standard operating procedures changes
- Discussions with employees about new equipment or machinery operation
- Discussion of hazards associated or special precautions with the equipment

#### **Job Safety Analysis Discussion**

Development or discussion of JSA will be considered safety training.

Demonstrate to employees exactly what has to be done to perform tasks efficiently and safely by explaining each step. Comments such as "be careful out there" are not considered safety training.

#### **Supplemental Materials for Safety Training**

In addition to the required safety meetings, employers may complement safety meetings in a variety of ways, such as:

- Conducting "tail gate" meetings
- Making written safety information, such as safety posters or envelope stuffers available to the employees
- Watching employees demonstrate the task, explaining each step back to you
- Checking employee performance through job site observations
- Discussing safety topics during departmental staff meetings

#### **How to Develop a Training Schedule Program**

##### **Step 1: Determine Training Focus**

Review recent accident related data, such as accident reports, loss runs, accident investigations, incident reports, and conduct an analysis by:

- Exposures
- Type of Injuries
- Cause of Injuries
- Work Areas

**Step 2: Identify Training Needs**

- Determine which training needs will have the greatest impact in the reduction of current accident trends.

**Step 3: Identify Goals & Objectives**

- Specify what you want your employees to gain from the training, and how you will evaluate the results

**Step 4: Develop or Organize Learning Activities**

- Develop a training activity to be used during the training. This may include researching what materials are currently available within the county, and what outside sources may assist you in the process.

**Step 5: Conduct Training**

- Conduct the training method you have determined will be most effective for your needs. Prioritize your training based on immediate needs. First Aid and CPR are important training; however, these topics will have little impact in the reduction of most work related accidents.

**Step 6: Evaluate Program Effectiveness**

- Review accident investigation and inspection reports and job site observation to evaluate the effectiveness of the program.

**Step 7: Improve the Program**

- After the review, determine what areas or topics need to be addressed to improve the current program. Sometimes serious accidents or unsafe conditions may force you to improvise on your safety training program.

**Available Resources**

TAC Safety and Law Enforcement Safety Catalogs

TWCC Resource Center

TEEX Safety Catalog

**Safety & Health Training Checklist**

- |   |            |           |
|---|------------|-----------|
| Has an individual responsible for conducting training been appointed? | <b>yes</b> | <b>no</b> |
| Has your representative received "Train-the-Trainer" training?        | <b>yes</b> | <b>no</b> |
| Have you developed a training schedule?                               | <b>yes</b> | <b>no</b> |
| Have you developed training topics by department?                     | <b>yes</b> | <b>no</b> |
| Have you assigned training dates?                                     | <b>yes</b> | <b>no</b> |
| Has training been documented?   | <b>yes</b> | <b>no</b> |
| Have employees signed attendance rosters?                             | <b>yes</b> | <b>no</b> |



## **Safety Inspection Element**

A self-inspection program is a good way to detect unsafe conditions, as well as unsafe acts that lead to accidents. A high number of accidents among county employees are attributed to poor housekeeping or unsafe acts by employees. Most prevailing types of injuries include slips, trips, falls, lifting, reaching, twisting, being struck by an object, caught between, cuts, burns, etc.

Knowing what to look for and where to look is important in the reduction of accidents; therefore, during the inspection look for locations where injuries can or have occurred.

Middle management should give guidance to their personnel in the development and implementation of the safety inspection program. A good inspection form should facilitate the process for the person responsible of conducting the inspections. Middle management should regularly review inspection reports for the identification of conditions which may lead to accidents and for implementation of corrective actions necessary for the elimination of the identified conditions.

### **What to Include In the Inspection Element?**

The policy should state who will be responsible for conducting the inspections. The unique structures and operations of counties around the state, require participating counties to indicate by position the person(s) responsible for this task.

The policy should also indicate how often the inspection will take place. For the purpose of the audit criteria, Road & Bridge and Sheriff's Departments will be expected to conduct monthly safety inspections of their facilities.

County vehicles, as well as other operating equipment, will be subject to regular inspections. Currently, counties around the state are expected to document the number of gallons of fuel consumed by the equipment, flat repairs, as well as parts used in the repair and maintenance of the equipment. For the purpose of the Safety Incentive Program, we will require participating counties to conduct inspections of the equipment with an emphasis on the identification of conditions that may affect the safe operation of the equipment. This will include, but is not limited to, all safety equipment from factories, as well as windshields, tires, brakes, lights, back alarms, etc.

**County vehicles including, pick up trucks, cars, patrol cars, etc., should be subject to:**

- Daily vehicle inspection
- 3000 mile inspections

### **Heavy Equipment**

- Minimum 250 hours inspections

All inspections should be documented. As part of the Safety Incentive package, we are providing you with sample forms that may be used for documentation of the equipment inspections.

The element should also indicate who will be responsible for reviewing the reports and corrective actions.

**When Should Inspections Be Conducted?**

Increases or changes in operations, or installation of new equipment often creates new hazards, such as congestion, poor housekeeping, and other conditions that may contribute to employee accidents. Consider scheduling an inspection if any of these changes in conditions occur.

**Inspection Element Checklist**

- Have you appointed a responsible person to conduct safety and health inspections? yes no
- Have you establish how often inspections will be conducted? yes no
- Have you stipulated how inspections will be documented? yes no
- Have you determined who will be responsible for the review of the inspection reports? yes no
- Have you conducted an inspection follow-up to ensure corrective action? yes no

### **Accident Reporting & Investigation Element**

All work-related accidents must to be documented immediately after the occurrence, followed by an accident investigation for the identification of contributing factors leading to the accident, and the corrective actions necessary for the prevention of similar accidents in the future. Therefore, the county needs to develop a policy to record and investigate the accidents.

The element should outline the procedure to report and document work-related accidents including:

- Personnel to be notified
- Reporting time line

The next item in the element should indicate the procedure to follow for the investigation and documentation of work-related accidents. The investigation procedure should indicate:

- Individual responsible for conducting the investigation
- Forms to be used during the investigation
- Individual(s) responsible for the review of the investigation findings
- Follow up process for the implementation of the corrective actions

#### **When Should Accidents Be Investigated?**

Every accident should be investigated as soon as possible after it occurs. If you wait, facts could be forgotten and evidence may be lost. Prompt investigation will result in the most complete and useful information. Investigations should take place at the scene of the accident.

#### **Why Should Investigations Be Conducted?**

Accidents do not just happen—they are caused. First, find out what caused the accident. Second, develop a plan of action to eliminate or control the cause. All accidents should be investigated, no matter how minor. Eliminating the causes and contributing factors of minor accidents can prevent serious accidents in the future.

#### **Who Should Conduct the Investigations?**

The immediate supervisor of the area where the accident took place should conduct the investigation. The reasoning behind this practice is that supervisors have better knowledge of all employees under his or her supervision, not to mention they have a

better understanding of the various operations and operating procedures of the department. Upper management should review all accident investigation reports within their respective departments.

### **How Should an Investigation be Made?**

Effective accident investigation skills are developed through experience. Basically, find out what causes the accident and what can be done to prevent its recurrence. Some suggestions include:

- Check the site and obtain facts before anything has changed
- Discuss the accident with the injured employee as soon as possible, after first aid or medical treatment has been given
- Obtain facts from witnesses regarding the conditions and circumstances before and after the accident
- Compile all facts, regardless how small, to assist you in determining the real cause
- Be objective—the purpose of accident investigation is to find the real cause and contributing factors behind the accident, not someone to blame.

Once the investigation process is complete take corrective actions to eliminate the cause and prevent recurrence. Upper management needs to make sure accident investigation recommendations are implemented.

- If employee failure was involved, make sure the employee is now properly trained. In addition, make sure to train other employees in similar operations.
- If the operation can be changed to eliminate the hazard, change it.
- Decide if equipment changes or guards are needed. Seek assistance, if necessary, to obtain the proper type of device.
- Follow up on corrective actions to make sure they are effective.

Your Texas Association of Counties Safety Specialist may be able to assist you in this process by conducting Accident Investigation Training.

**Accident Investigation & reporting Checklist**

- |   |     |    |
|---|-----|----|
| Have you developed county accident reporting policy procedure?                                      | yes | no |
| Have you appointed, by position, the person to conduct accident investigation?                      | yes | no |
| Have you developed accident investigation guidelines covering how investigations will be conducted? | yes | no |
| Have you specified in the policy who will review the accident investigation reports?                | yes | no |

**Review & Revision Element**

The purpose of the review and revision element is keep your Accident Prevention Program current and working efficiently and effectively to prevent losses, accidents, and injuries.

This element will provide the opportunity to fine tune your program and make necessary adjustments to better suit your specific county needs. Schedule, in advance, a thorough review of each component of the plan and make necessary changes.

Ensure new equipment procedures or operations are incorporated into the appropriate component of the plan. Check existing equipment procedures and operations to ensure that your current component guidelines are meeting your safety needs.

Do not forget to notify all county employees of the changes to the APP.

All participating counties will be required to select an individual responsible for preparing and presenting the Accident Prevention Implementation Status Report to Commissioners' Court. The purpose of the report is to keep Commissioners' Court informed of the progress of the implementation of the Accident Prevention Plan. As indicated on the sample APP, the report will be presented to Commissioners' Court on the last regularly scheduled Commissioners' Court of each month, a copy of the report will be sent to your Texas Association of Counties Safety Specialist via fax or e-mail.

**Program Review Checklist**

Has a person been appointed to conduct and document the

program review?

yes no

Have you stipulated when the program review will be conducted?

yes no