

Injury and Illness Prevention Program



California State University, Chico

The Department of Environmental Health and Safety

Updated July 26, 2007

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1.0

REGULATORY AUTHORITY

California Labor Code Section 6401.7 (Chapter 1369, Statutes 1989.)
California Code of Regulations, Title 8, Section 3203.

For additional information, please contact:
The Department of Environmental Health and Safety
<http://www.csuchico.edu/ehs>

2.0 OVERVIEW

INTRODUCTION AND

California State University Chico (CSUC) makes every effort to maintain a healthy and safe work environment for faculty, staff, students, and visiting contractor's. The University is committed to complying with health and safety standards set forth by local, State, and Federal governments. To meet these goals, several health and safety programs have been developed and implemented by these government entities and the University itself. Collectively, these programs represent the University's efforts to minimize occupational injury and illness, to preserve and protect environmental quality, and to reduce liability.

The development and implementation of an Injury Illness and Prevention Program, is required by the California Division of Occupational Safety and Health Administration, Department of Industrial Relations (Cal/OSHA). Senate Bill 198, adopted during the 1989 California legislative session, informs employers that they are accountable for the safety and health of their workers. Senate Bill 198 was codified in the California Insurance and Labor Codes on October 2, 1989. The General Industry Safety Orders (GISO) Section 3203 in the California Code of Regulations regarding workplace injury and illness prevention programs are governed by Cal/OSHA and require specific program elements, including the designation of a responsible person and identification of a system for:

- Communicating with employees on matters concerning safety and health;
- Identifying, evaluating and reducing workplace hazards;
- Implementing procedure for injury/illness investigation;
- Mitigating hazards in the workplace;
- Training employees; and
- Maintaining records.

This comprehensive Injury Illness and Prevention Program (IIPP), has been prepared by the Department of Environmental Health & Safety (EH&S) at CSUC. The IIPP has been created to address the specific regulatory requirements outline above, as well as to incorporate other elements of the university's occupational hazard control programs and procedures. The IIPP can be modified by EH&S at any time, to revise or incorporate new health and safety programs/procedures, including those required by future legislation.

3.0

PURPOSE

It is the policy of the University to maintain, insofar as it is reasonably within its control to do so, a campus environment for faculty, staff, students and the public that will not adversely affect their health and safety or subject them to avoidable risks of accidental injury and/or illness. No student or employee will be required to perform any task which is determined to be unsafe or unreasonably hazardous.

To implement this policy, departments will ensure that facilities and equipment meet all local, State and Federal, safety laws and regulations. Departments will also develop appropriate health and safety policies, standards and procedures for their areas.

All employees shall follow safe and healthy work practices defined and established by the University and departments' safety and health guidelines. Failure to do so may result in disciplinary measures.

While the responsibility for the University's health and safety ultimately rests with the University President, immediate responsibility for workplace health and safety rests with those who hold supervisory positions. Individual employees are also responsible for preventing campus accidents and for ensuring that safe and healthy conditions are provided and followed within their area of responsibility. All members of the University community are expected to act in accordance with each aspect of the health and safety programs and procedures adopted by CSUC. While the provisions of the health and safety regulations apply only to employees, the University is committed to protecting the health and safety of students and the public as well.

4.0

OBJECTIVES

An effective Injury and Illness Prevention Program will provide an effective means for worker health protection and injury prevention. The IIPP can also assist management in determining if hazards exist in the workplace, how to correct hazards that do exist, and what steps to take to prevent hazards from recurring.

Proper implementation of the IIPP can result in many positive results, including, but not limited to:

- Management is able to prevent many hazards from occurring through regular self-inspections;
- Employees know to report potentially hazardous conditions without fear of reprisal and know that their reports will be given prompt and serious attention;
- Workplace equipment is maintained in safe and good working condition;
- Management has established procedures for investigating workplace accidents and reporting injuries and illnesses;
- Hazards are corrected as soon as possible after they are identified;
- Employees have received general safety and health rules which are written and apply to everyone;
- The University has established a written plan containing procedures employees should follow in case of emergency.

5.0

RESPONSIBILITIES

5.1 University Administration

The ultimate responsibility regarding environmental health and safety issues specific to University facilities and operations rests with the University President. In accordance with California Code of Regulations, General Industry Safety Orders, Section 3203(a) (1), the Vice President for Business and Finance has been appointed as the person with authority and responsibility for developing and implementing the IIPP. Therefore, general policies which govern the activities and responsibilities of the EH&S program are established under the final authority of the President.

5.2 Department of Environmental Health and Safety (EH&S)

It is the responsibility of EH&S, by Presidential Edict and under the guidance of the University Cabinet, to develop and manage the IIPP. Further responsibilities include:

- Development, implementation and maintenance of the IIPP;
- Consultation with Department Deans, Directors, and Chairpersons regarding program compliance;
- Consultation on issues of hazard identification and evaluation; procedures for correcting unsafe conditions, for communicating with employees; and for providing and recording employee training;
- Consultation in the areas of biological safety, chemical hygiene, emergency preparedness, fire safety, hazard communication, hazard identification, hazardous materials management, industrial hygiene, occupational safety, radiation safety, and safety education and training; among others;
- Preservation of centralized environmental and employee monitoring records, allowing employee access as directed by law.

5.3 Deans, Directors, and Department Heads

It is the responsibility of deans, directors, and department heads to develop departmental procedures to ensure effective compliance with the IIPP and other University health and safety policies. Specific responsibilities include employee and student education and training, identification and correction of unsafe conditions, and record keeping. Specifically these individuals will:

- Develop and maintain written departmental procedures and ensure that each supervisor adheres to adopted procedures;
- Develop and implement an education and training program designed to instruct employees and students in general safe work practices as well as instruction specific to their job duties. Such education and training shall take place prior to the employee or student being assigned to a potentially hazardous task;
- Instruct employees and students in the recognition and avoidance of unsafe conditions, including hazards associated with non-routine tasks and emergency operations. Permit only those employees or students trained to operate potentially hazardous equipment;
- Develop a system of record keeping to document all employee and student education and training activities and submit a copy of training records to EH&S;
- Develop and maintain an inventory of hazardous materials present in all work areas within the department;

- Request a Material Safety Data Sheet (MSDS), or equipment safety procedure when ordering chemicals, machinery, or other potentially hazardous materials or equipment;
- Post in a conspicuous location appropriate safety notices or procedures;

Develop methods, as appropriate, to inform outside contractors' who work in areas under departmental jurisdiction of the hazards to which those employees may be exposed.

5.4 Supervisors and Principal Investigators

- Develop local area procedures to ensure effective compliance with the IIPP as it relates to operations under their control;
- Provide and record employee and student training, including the identification and correction of unsafe conditions;
- Develop and maintain written workplace procedures which conform to campus and departmental guidelines;
- Ensure that each employee adheres to adopted procedures and instruct employees and students in the recognition and avoidance of unsafe conditions, including hazards associated with non-routine tasks and emergency operations;
- Permit only those employees or students trained to operate potentially hazardous equipment to do so.

5.5 Employees

Employees are expected to adhere to safe and healthy work practices defined by the IIPP and established campus and departmental safety and health guidelines. Due to the number of potential hazards that may exist or may be created in the work environment, employees must first use common sense and good judgment. Employees are also responsible for:

- Reading and complying with procedures and guidelines provided by their supervisors;
- Informing their supervisors of workplace hazards;
- Attending established education and training sessions;
- Asking questions of their supervisors when there is concern about an unknown or potentially hazardous situation.

5.6 Students

Students are required to adhere to safety practices presented by faculty, technical staff, student assistants, graduate assistants, or other authorized individuals. They are also expected to report suspected and known hazards to a University authority or other responsible parties.

6.0

SAFETY COMMUNICATION

The IIPP ensures that employees have the right to be advised of occupational safety and health hazards and receive training on safe work practices, including the use of personal protective equipment. Employees also have the right to report safety hazards, request information on safety hazards, or make safety suggestions without fear of reprisal. This can be done through various channels including reporting hazards and/or inquiring about safety information from a Supervisor, from the department, or by contacting EH&S. Additional methods for communicating matters relating to health and safety, which include:

6.1 Department Safety Meetings

Departments will conduct regular safety meetings at which safety and health issues are freely and openly discussed by employees of the department. Management will attempt to schedule the meetings at a time when most employees can attend and keep minutes to document those in attendance and what topics were discussed.

6.2 Safety Concern Hotline

1-877-TELL EHS (835-5347). The phone line is another means for CSU, Chico faculty, staff and students to voice a health or safety concern on campus. The caller will be able to leave an anonymous message, or if they wish, they can provide their name and contact number, and EHS will follow-up with the caller.

6.3 Employee Safety Training

The University provides general training programs for employees on an ongoing basis, for information on specific training programs employees should contact their departments or EH&S. Both entities provide specific training programs for employees either on a periodic basis, prior to job assignment, or when work assignments change.

6.4 Posters / Videos / Brochures / Signs

Environmental Health and Safety has an extensive library of publications and videos used to promote safe and healthy work practices. These resources can be accessed by any department on campus by contacting EH&S. Required signs and postings within departments are to be displayed in high visibility areas in the workplace.

6.5 Smoking Cessation Program Information

CSU Chico is committed to providing the safest workplace possible. Cigarette smoking increases your chances to certain exposures in the workplace. One of the most noted types of duties that smoking can increase your chances of exposure is asbestos abatement work. While our employees do not do major abatement work, we are still required to provide you with resources to stop smoking. Visit www.cancer.org for the American Cancer Society and other related informational sites.

7.0

ENVIRONMENTAL HEALTH AND SAFETY INSPECTIONS

A health and safety inspection program is essential in order to reduce unsafe campus conditions which may expose faculty, staff, students and visitors to incidents that could result in injury to individuals or damage to property.

7.1 Scheduled Workplace Inspections

It is the responsibility of each department to ensure that a regular and systematic inspection process is scheduled and followed for all departmental areas. It is recommended that supervisors who are knowledgeable of the activities and materials present in the area conduct these inspections. Records of the inspections, the deficiencies noted, and the corrective actions taken to remedy the deficiency should be created and kept on file within the department.

- The frequency of workplace inspections is left up to the departments' discretion. However, EH&S recommends that all areas be inspected at least semi-annually. Those departments engaged in hazardous operations are encouraged to conduct more frequent inspections;
- Environmental Health and Safety will conduct inspections of non-departmental public access area (i.e., hallways, stairways, interior, and exterior public assembly areas, classrooms, etc.). Environmental Health and Safety will make recommendations or issue requests for corrective actions to be taken that will address the deficiencies documented during such inspections;
- Environmental Health and Safety will conduct inspections of departmental areas (i.e., labs, workshops, foundries etc.). Environmental Health and Safety will make recommendations or issue requests for corrective actions to be taken that will address the deficiencies documented during such inspections;
- Information on examples of inspection documents can be found in Supplement 2. You may select from a number of general to specific inspection check lists by contacting EH&S, who are also available if you would like assistance in developing a specific inspection form for your area.

7.2 Unscheduled Workplace Inspections

- Departments and/or EH&S will conduct periodic unscheduled inspections of all workplaces to help ensure the maintenance of a safe and healthful workplace. Environmental Health and Safety will make recommendations or issue requests for corrective actions to be taken that will address the deficiencies documented during such inspections;
- Departments and/or EH&S will conduct a health and safety inspection in the event of an occupational injury, occupational illness, or exposure to hazardous substances as defined by Cal/OSHA. Departments and/or EH&S will make recommendations or issue requests for corrective actions to be taken that will address the deficiencies documented during such inspections.

8.0

ACCIDENT REPORTING AND INVESTIGATION

All injuries on the job should be reported. However, different requirements exist for reporting “minor” vs. “serious” injuries. For purpose of this document, a “serious” injury is any industrial injury or occupational disease which: 1) results in death, dismemberment, disfigurement, or loss of work time beyond the day of the injury; 2) requires medical treatment other than first aid; or 3) involves exposure to chemical substances in amounts considered hazardous, or substances which are listed as regulated carcinogens, (see Supplement 3 for information on the OSHA 301, Work Related Injury and Illness Incident Report).

- Minor injuries incurred on the job will be reported to the immediate supervisor of the injured employee;
- Serious occupational injury, illness as defined by Cal/OSHA is any injury or illness occurring in a place of employment or in connection with any employment, which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement, must be immediately reported to their Supervisor. The Department of EH&S will contact the applicable regulators within 8 hours of notification of such injury. Environmental Health and Safety will investigate the circumstances of the accident and document the findings.

9.0

HAZARD CONTROL PROCEDURES

Hazards identified during scheduled or unscheduled inspections, or as a result of accident investigations, shall be corrected in a timely manner consistent with the severity of the hazard.

- Inspection findings will be prepared in writing and submitted to department chairs and/or EH&S as appropriate. Corrective action or a suitable timetable for elimination of a hazard (where appropriate) is the responsibility of the department;
- Once identified, hazards will be ranked according to both consequence (the severity) and probability (the frequency) as defined in the Hazard Classification table. Prioritization of abatement actions will be based on the ranking scheme;
- Serious violation and hazards will always be given top priority and will be corrected immediately.

9.1 Hazard Classification

Order of Priority	Consequence (Severity)	Probability of Injury Occurrence
1	Imminent danger exists. Capable of causing death, possibly multiple deaths, widespread occupational illness and loss of facilities.	Probable
2	Severe injury, serious illness property and equipment damage	Reasonably probable
3	Minor injury, illness or equipment damage may result	Remote
4	First Aid Care	Extremely remote

9.2 Imminent Hazard Situations

An imminent hazard is any condition or practice where there is reasonable certainty that a hazard exists that can be expected to cause death or serious physical harm immediately or before the hazard can be eliminated through normal corrective measures; (i.e., an employee is working on an electrical line without shutting off the power).

- Upon discovery of an imminent hazard the individuals first aware of the hazard should notify the appropriate agency (i.e. 911, University Police, Facilities Management Services, and/or EH&S);
- The Department Head or EH&S will inform employees of any imminent hazard(s) that cannot be immediately corrected.

10.0

EMPLOYEE SAFETY TRAINING

Effective dissemination of safety information lies at the very heart of a successful Injury and Illness Prevention Program. Training for employees in general safe work practices as well as specific instruction with respect to hazards unique to each employee's job assignment, is the single most effective means for reducing injuries and illnesses in the work place.

10.1 Types of Training

Many types of training may be used to communicate safety-related information to employees. Training may vary widely with respect to instructional method, setting, subject matter, etc.:

- Classroom instruction;
- Job-site safety meetings;
- On-the-job training;
- Written instruction or training materials;
- Computer Based Training.

10.2 General and Specific Safe Work Practices

Specialized training sessions dealing with an employee's unique job assignment must be developed by each supervisor.

- Each supervisor will ensure that all new employees receive general and specific training prior to assignment on a new job;
- Supervisors will ensure that employees are trained whenever new substances, processes, or equipment are introduced to the workplace which represent a new hazard or whenever the supervisor receives notification of a new or previously unrecognized hazard;
- Environmental Health and Safety is responsible for coordinating generalized safety training programs as these programs are elements of larger programs that service broad campus needs. For a list of these programs please see section 12 of this document;
- All training will be documented in writing by the department or EH&S depending on who provided the training. Topics, participants and dates will all be recorded and kept on file within each department and at EH&S. When training is conducted within the department a copy of the training records should be sent to EH&S.

It is the responsibility of each supervisor to understand his/her employee's job risks and related hazards. Environmental Health and Safety has completed a series of Hazard Evaluations that identify jobs risks and related hazards for general work areas and special job classes at the University (see The University's Exposure Control Plan, Supplement 7 and/or Hazard Evaluations, Supplements 3-6). These evaluations can be used to recognize potential safety hazards associated with their job assignment.

11.0 DOCUMENTATION AND RECORD RETENTION

Many standards and regulations of Cal/OSHA contain requirements for the maintenance and retention of records for occupational injuries and illnesses, medical surveillance, exposure monitoring, inspections, and other activities and incidents relevant to occupational safety and health.

11.1 Occupational Injuries and Illnesses

Specific information regarding the number and type of occupational injuries and illnesses must be prepared, maintained, and posted as described below:

- Injuries/Illnesses shall be reported to Disability Program Office (DPO) at x5436 by the supervisor immediately upon notification of an injury. Within 8 hours of the injury/illness, the direct supervisor must complete all sections of the OSHA 301 report. All originals of these forms shall be forwarded to the Disability Program Office (Kendall Hall 118 or campus mail Zip 022).
- Records of occupational injuries and illnesses will be kept on file with EH&S and will be made available for review by Cal/OSHA at any time, for a period of five (5) years.

11.2 Material Safety Data Sheets (MSDS)

Each MSDS received by the University will be maintained for at least 30 years. If the name of the chemical, substance, or agent is not available, some record of the substance shall be created which identifies the use for the chemical, the location of use, the date and time when used. This record will then be retained for 30 years.

11.3 Employee Exposure Records

Each employee exposure record will be preserved and maintained for at least 30 years except for certain background data to workplace monitoring and certain biological monitoring results. Such records include workplace monitoring or measuring of a toxic substance or harmful physical agent; biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems; material safety data sheets; and in the absence of the above, a chemical inventory or any other record which reveal where and when used and the identity of a toxic substance or harmful physical agent. Departments using any regulated carcinogens have additional reporting and record keeping requirements under Cal/OSHA.

11.4 Employee Access to Exposure and Medical Records

The University recognizes that employees and their designated representatives and authorized representatives of the Chief of the Division of Occupational Safety and Health (Cal/OSHA) have a right of access to relevant exposure and medical records. Such access is necessary to yield both direct and indirect improvements in the detection, treatment and prevention of occupational disease. Whenever an employee or designated representative requests access to a record, the University shall assure that access is provided in a reasonable time, place and manner. The University's Medical Monitoring Program outlines the medical monitoring procedures and policies and can be located in EH&S office.

Note pertaining to Medical Records:

It is understood that medical records for each employee will be preserved and maintained for at least the duration of employment plus 30 years, except for certain health insurance claims records, first aid records, or the medical records of employees who have worked for less than one (1) year if they are provided to the employee upon termination of employment. Such records include medical and employment questionnaires or histories; the results of medical exams and lab tests; medical opinions; diagnoses, progress notes, and recommendations; and employee medical complaints.

11.5 Employee Exposure and Medical Record Analyses

Each analysis using exposure or medical records will be preserved and maintained for at least 30 years.

11.6 Documentation of Activities

Essential records, including those legally required for workers' compensation, insurance audits and government inspections will be maintained for as long as required. The University will also keep records of steps taken to establish and maintain the IIPP. They must include:

- Records of scheduled and periodic inspections to identify unsafe conditions and work practices. Records will be created and maintained for at least three (3) years;
- Documentation of health and safety training for each employee. Records should include employee name, training dates, type(s) of training and the name of the trainer. Records will be retained for at least three (3) years;
- Training records will be kept in each department and/or with EH&S, as appropriate.

12.0

RESOURCES

Programs incorporated into the overall campus Injury and Illness Prevention Program strategy exist for which EH&S has established an oversight. This helps ensure that adequate environmental health and safety measures are taken. Existing programs are outlined below; specific elements are contained in the supplements noted:

- Exposure Control Plan (Supplement 7)
- Chemical Hygiene Plan (Supplement 8)
- Confined Space Entry Program (Supplement 9)
- Campus Emergency Management Plan (Supplement 10)
- Fire Prevention Plan (Supplement 11)
- Emergency Action Plan (Supplement 12)
- Hazard Communication Program (Supplement 13)
- Hazardous Materials Management Program (Supplement 14)
- Medical Waste Manual (Supplement 15)
- Radiation Safety Manual (Supplement 16)
- Workplace Violence Prevention Plan (Supplement 17)
- Ergonomic Evaluation Program (Supplement 18)
- Pesticide Management Program (Supplement 19)
- Risk Management (Supplement 20)

13.0**COMPLIANCE
REQUIREMENT**

All employees shall adhere to safe and healthy work practices defined by the IIPP and established campus and departmental safety and health guidelines. Failure to do so may result in disciplinary measures consistent with the provisions of memoranda of understanding between the California State University and the exclusive representatives of the University's collective bargaining units, as governed by Education Code 89535.

In addition, positive incentives for compliance are in place for all employees. These include nomination for the University's Health and Safety Award, the Governor's Employee Safety Award, and letters of commendation written by supervisors on behalf of employees who have made noteworthy achievements in the area of occupational health and safety.

For additional information on the policies, procedures, and programs outlined in the IIPP, please contact the Department of Environmental Health and Safety (EH&S) at (530) 898-5126 or visit EH&S on the web at www.csuchico.edu/ehs.

14.0

SUPPLEMENTAL MATERIAL

Original document created, March, 1992

Revised June, 1996: Revised August, 1997: Revised February, 2004: Revised July, 2005

Supplement 1: For several examples of general to specific occupational health and safety check lists please contact EH&S at extension 5126. Environmental Health and Safety is also available to assistance with developing a specific inspection form for your area.

Supplement 2: To receive a copy of the OSHA 301, "Work Related Injury and Illness Incident Report", please contact EH&S at extension 5126 or download the form at the following URL, <http://www.csuchico.edu/hr/Forms/EEOD-OSHA301.pdf>

Supplements 3-6: A series of Hazard Evaluations, which identify jobs risks and related hazards for general work areas and special job classes at the University. These evaluations can be used as templates for Supervisors and employees to recognize potential safety hazards associated with their job assignment.

For copies of or information regarding the following Health and Safety supplements, please contact EH&S at extension 5126 or visit the department in AJH, Room 130.

Supplement 7: The Exposure Control Plan is also known as the bloodborne pathogen plan or program. It provides guidance for employees who many come in contact with bloodborne pathogens, i.e. Hepatitis A, Hepatitis B and HIV. It also includes information regarding universal precautions, exposure determinations and Hepatitis B vaccinations.

Supplement 8: The written Chemical Hygiene Plan provides information for individuals utilizing chemicals on the job, including methods of safe handling and storage of reactive and toxic substances and guidance on personal protection.

Supplement 9: The written Confined Space Entry Program provides detailed information on the regulations and requirements for safe entry into a confined space. The program also provides a list of locations and requirements for entry into most of the confined spaces identified on the main campus.

Supplement 10: The written Campus Emergency Management Plan contains information about how the University and local agencies will respond in the event of a variety of emergencies that could potentially affect the campus.

Supplement 11: The Fire Prevention Plan is a written fire prevention plan that establishes practices and procedures to control potential fire hazards and ignition sources.

Supplement 12: The written Emergency Action Plan is the written program to give faculty, staff, and student clear and precise guidance in the event of an emergency.

Supplement 13: The written Hazard Communication Program contains information on how to use, handle and store hazardous substances in each workplace; a system of labeling containers; material safety data sheets for each hazardous substance used; and information for supervisors on training employees who use hazardous materials.

Supplement 14: The written Hazardous Material Management Program establishes practices and procedures for training employees in the safe handling and storage practices of hazardous chemicals used in the workplace.

Supplement 15: The Medical Waste Manual provides employees with information on how biohazardous waste must be handled, stored, and disposed of on campus. It also contains information on the University's procedures for disinfecting and cleaning up biohazardous spills.

Supplement 16: The written Radiation Safety Manual establishes practices and procedures for the safety of employees during operations involving ionizing, ultra-violet, laser and microwave radiation sources. Environmental Health and Safety administers the radiation safety program in conjunction with the Radiation Safety Committee, to ensure safe practices.

Supplement 17: The written Workplace Violence Prevention Plan provides information on awareness and prevention of violent incidents in the workplace.

Supplement 18: Environmental Health and Safety has a written Ergonomic Evaluation Program with suggestions on work station ergonomics that encourage workstations that fit the employee.

Supplement 19: The written Pesticide Management Program provides information on the safe use, storage and handling of pesticide type chemicals used on campus.

For information regarding the Risk Management Program supplement, please contact Risk Management and Business Services at extension 6588 or visit the department in Kendall Hall, Room 111.

Supplement 20: The Risk Management program provides for the establishment and administration of self-insurance funds; maintenance of insurance broker and insurance company relationships; assessment of risk, risk costs and coverage, development and implementation of risk management and loss control policies.