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1.0 POLICY

It is the policy of the California State University, Sacramento (Sacramento State or the University) to provide its employees with a safe and healthful workplace. All employees are required to ensure that the guidelines of this Injury and Illness Prevention Program (IIPP) are followed. The University will strive to establish, implement and maintain an effective IIPP as required by California Code of Regulation, Title 8, Section 3203.

2.0 PURPOSE

The purpose of this document is to establish systems and procedures to meet the following IIPP requirements:

- Identification of person(s) with authority and responsibility for implementation
- Establishing a system for ensuring compliance
- Establishing a system of communication
- Identifying and evaluating workplace hazards
- Investigating occupational injuries and illnesses
- Correcting unsafe or unhealthy conditions, work practices and work procedures
- Training
- Recordkeeping

3.0 SCOPE

This document applies to all University employees including paid work study students and paid student employees. All personnel shall comply with the provisions outlined in this document.

4.0 RESPONSIBILITIES

4.1 University President

The ultimate authority and responsibility for environmental health and safety management rests with the University President (President). As used elsewhere in this document, President also refers to the President's designee.

4.2 Vice Presidents and Program Center Administrators

- *Program and Policy Review:* Participate in the review and pre-approval of new or revised environmental health and safety programs and policies affecting Program Center work activities, as determined appropriate by the Campus Safety and Environmental Health Committee.
- *Physical and Financial Support:* Exercise authority to allocate physical and financial resources necessary to improve the IIPP and ensure compliance.

- *Safety Committee Meetings:* Ensure that Safety Committee(s) (when such a committee has been determined appropriate) is/are meeting no less than semi-annually.

4.3 Department Heads, Chairs, and Managers

- *Ensure Compliance:* Ensure that the IIPP is being followed within their Departments.
- *Resource Allocation:* Substantiate the need for, and request through the appropriate management command chain, resources necessary for the correction of safety hazards.
- *Ensure Effectiveness:* Evaluate, with the assistance of staff input, the effectiveness of safety programs implemented, and provide recommendations for improvement to the Campus Safety and Environmental Health Committee.
- *Disciplinary Actions:* Assist supervisors in taking appropriate actions against employees, who knowingly and/or consistently violate safety rules and guidelines.
- *Training:* Ensure that employees are appropriately trained for the responsibilities assigned.

4.4 Supervisors & Lead Personnel

- *Ensure Compliance:* Ensure that the IIPP and other safety programs are followed within their work groups.
- *Safety Concerns:* Assist employees in identifying and correcting safety concerns.
- *Corrective Actions:* Identify and take appropriate action to correct safety and environmental health deficiencies.
- *Notification:* Notify their Manager/Chair when the correction of deficiencies requires the allocation of financial and physical resources beyond the Supervisor's or Lead Person's authority.
- *Disciplinary Action:* Recommend corrective or disciplinary action to the manager when employees knowingly and/or consistently violate safe work practices.
- *Enforcement:* Enforce the use of all required personal protective equipment (PPE), safety programs or procedures necessary for the safe completion of an employee's job responsibilities.
- *Training:* Ensure that employees are appropriately trained for the responsibilities assigned.

4.5 Employees

- *Committee Participation:* Participate as a member on one of the program-specific safety committees (as appointed by the President) or as a member of the department safety committee (when such a committee has been implemented).
- *Compliance:* Follow the guidelines of the Sacramento State University IIPP and any other environmental health and safety programs.
- *Corrective Action:* Take appropriate action to protect themselves and coworkers from recognized hazards. Immediately take appropriate action to abate and correct

unsafe or potentially hazardous conditions or report them to a supervisor, manager, or someone who can abate the unsafe condition.

- *Training:* Complete all assigned safety training requirements. Refrain from entering into work tasks that require specialized training, until such training has been completed.

4.6 IIPP Program Administrator

The IIPP Administrator is the EH&S Industrial Hygienist. Responsibilities include:

- *Annual Review:* Ensure that the Sacramento State IIPP is reviewed annually.
- *Oversight:* Oversee the development of written OSHA required environmental health and safety documents, training programs, and employee training matrices and schedules.
- *Statistics:* Summarize environmental health and safety performance statistics.
- *Liaison:* Advise management, through the Campus Safety and Environmental Health Committee, on safety policy and procedure development needs, concerns, and progress.
- *Consultation:* Provide guidance on new or proposed regulatory requirements.
- *Resource Allocation:* Assist in the identification of financial and physical resources necessary for the correction of substantiated safety deficiencies.

4.7 All Campus Employees: Stop Work Authority

- Every employee of the University has the authority to temporarily stop their work, at any time, if the employee has a reasonable belief that there is a safety concern to the extent that performing the work may lead to injury or illness to themselves, a co-worker, or any person on campus.
- If the employee has a reasonable belief that there is a safety concern with a tool, piece of equipment or building infrastructure, and the employee has in their job description responsibility for the tool, piece of equipment or building infrastructure, they may take the step to shut off, disable, or avoid using the tool, piece of equipment or building infrastructure as a safety precaution, and they must immediately report this safety concern to their management chain and to the Environment, Health and Safety office (EHS).
- Under no circumstances shall SWA be used without reasonable belief that there is a safety concern and without making a report to their management and EHS.
- Under no circumstances will any employee, supervisor or manager retaliate in any way, or initiate any disciplinary action against any employee for invoking SWA and making a safety report in good faith.

5.0 EMPLOYEE RECOGNITION & DISCIPLINARY ACTION

5.1 Employee Evaluations

Supervisors are required to accurately reflect the employee's safety performance on an annual basis, during the annual written evaluation process. Employees who receive unsatisfactory safety performance reviews should be placed on a plan of improvement.

5.2 Recognition Procedure

Letter of Commendation – Employees who enhance the Sacramento State University Safety Program through the development of safety devices, practices, or work-area and equipment specific safety procedures should be formally commended. The process by which *Letters of Commendation* are awarded, prepared, and presented is left to the discretion of the individual Program Center Heads.

5.3 Disciplinary Action Procedure

The supervisor assists in documenting and recommending, through appropriate lines of management, disciplinary action when an employee knowingly or consistently violates safety rules. Disciplinary action, up to and including termination, can be pursued depending on the type and/or frequency of the violations.

Where a general lack of understanding of safe work practices has resulted in an unsafe act (regardless of the healthful outcome), or where an otherwise conscientious employee experiences a lapse in good judgment leading to an unsafe act, the supervisor or lead person is required to provide, as a minimum, verbal counseling to the employee. Retraining (by the lead worker or through the formal training program) should also be considered as a method to prevent the employee from committing future unsafe acts.

Examples of types of unsafe acts may include, but are not limited to, the following:

- Violating a work rule regarding safety
- Carelessness resulting in injury to self and/or others
- Misuse of University equipment
- Misuse of University vehicles or failure to adhere to the California Vehicle Code
- Failure to heed University posted caution and warning signs
- Failure to report accidents or injuries involving self
- Any other action deemed detrimental to the health and well being of a University employee or the general public

6.0 COMMUNICATING INFORMATION

6.1 Bulletin Board Postings

Written safety information including information regarding employer/employee rights and responsibilities is posted on bulletin boards located in offices and break rooms throughout the University. Employees are encouraged to become familiar with the location of, and the content of materials posted on the bulletin boards in their work areas.

6.2 Anonymous Hazard Notification by Employees

Open communication between employees and supervisors is encouraged. Generally, employees should address their safety concerns with their immediate supervisor. However, if an employee desires to provide **anonymous notification** of a safety hazard, he/she may do so by contacting the Office of Environmental Health and Safety (without disclosing their personal identity) through intra campus mail at mail stop 6145 or by phone at (916) 278-2020. Employees may also contact Cal-OSHA with their safety related concerns. The phone number of the local Cal-OSHA enforcement office is (916) 263-2800.

Employee notifications should indicate:

- nature of the concern,
- location,
- time the concern was first identified, and
- names of individuals involved, when appropriate.

6.3 Safety Programs

The website maintained by Risk Management Services provides extensive safety information, as well as a description of safety programs and policies.

Risk Management and EH&S Programs include:

- Respiratory Protection
- Lock Out / Tag Out
- Hazardous Materials Management
- Confined Space Entry
- Medical Monitoring
- Pollution Prevention
- Emergency Preparedness
- Radiation & Laser Safety
- Sustainability Reports

Employees can obtain hard copies of the Environmental Health and Safety programs, through their supervisor, by contacting EH&S at (916) 278-2020 or by accessing the Risk Management Services web page at www.rms.csus.edu.

COVID-19 Safety Plan

In response to the COVID-19 worldwide pandemic, established March 2020, Sacramento State has implemented a COVID-19 Safety Plan. This plan is a comprehensive plan that includes elements including, but not limited to:

- Risk Assessment Processes
- Training and Outreach
- Symptom Checking, COVID-19 Testing, and Contact Tracing
- Social Distancing

- Sanitizing
- Facial Coverings
- Building HVAC
- Safety Ambassadors
- Housing
- Athletics
- Waste Management
- Safety Plan Enforcement

For the full COVID-19 Safety plan, please reference Appendix G: COVID-19 Safety Plan.

6.4 Employee Group Safety Meetings (Optional)

Non-mandatory, group safety meetings are generally implemented in departments where potentially serious occupational exposures may exist on a regular basis. Such exposure may result from construction, maintenance, or technical support work activities. Campus organizations that might implement Group Safety Meetings include: Facilities Services, Department of Theater and Dance, Science Technical Support, etc. Group safety meeting agendas should include date, agenda items, names and signatures of attendees.

Group safety meetings should be used to:

- **Review** training performance requirements of various safety training programs and procedures. Videos, quizzes, topic review sheets, codes of safe work practices, etc. can be used for this purpose,
- **Discuss** employee concerns regarding housekeeping, projects, and general safe work practices,
- **Discuss** work-related accidents, injuries or illnesses, and
- **Implement changes** that have been made to Environmental Health and Safety programs, policies, or procedures.

6.5 Tailgate Safety Meetings (Facilities Services Only)

Facilities Services employees, engaged in the construction, alteration, painting, repairing, construction maintenance, renovation, removal, or demolition of any fixed structure or its parts shall participate in Tailgate Safety Meetings.

Tailgate meetings shall be:

- Held at least every 10 working days
- 10-15 minutes in length (recommended)
- Designed to keep employees alert to work-related accidents and illnesses
- Kept relevant to the work hazards

7.0 TRAINING

7.1 New Employee Training Requirements

New employees shall complete appropriate IIPP training prior to engaging in any potentially hazardous work assignments. General IIPP training shall be completed within two weeks of hire.

7.2 All Employees Training Requirements

Supervisors are responsible for ensuring that their employees receive training in accordance with their CSU Learn training profile. Appendix A can be used as a tool to construct CSU Learn training profile. Employees should also receive training as specified by their individual or group learning matrix. Employees can view their training profile by logging into CSU Learn.

Supervisors, with the assistance of the Environmental Health and Safety Department, develop training matrices, which specify the minimum training requirements an employee must complete prior to engaging in the related work activity.

At a minimum, supervisors should ensure that employees complete initial and refresher training in accordance with the requirements of their training profile, and must ensure that the completion of such training has been documented.

NOTE: Training matrices have been/or are being developed for the purpose of identifying the most likely training needs of an “individual” and should not be construed to be all inclusive or exclusive of an individual’s training needs. The mere fact that an employee has not been trained, per their training profile, does not constitute an “employee exposure” violation of OSHA or University policy. Non-compliance with training requirements only occurs when employees engage in hazardous work activities for which they have not been appropriately trained.

Employees shall not engage in work related duties exposing them to hazardous conditions (hazardous materials included) for which they have not been appropriately trained.

7.3 Comprehensive Safety Training

The Office of Environmental Health and Safety is responsible for the development of Cal-OSHA compliant, comprehensive safety training programs, and the associated Safety Training Schedule.

Employees can complete comprehensive safety training by one of the following methods:

- One-on-one study with any Sacramento State University employee who meets the instructor qualifications, as listed in the Lesson Plan (sign Appendix F- IIPP Employee Affidavit),
- Completing an on line web based training in CSU Learn, or
- Attending a prescheduled instructor led training course.

Contact the Office of Environmental Health and Safety at (916) 278-2020 for clarification or assistance concerning employee training requirements, training profile development, and/or instructor qualifications.

8.0 IDENTIFYING AND EVALUATING WORKPLACE HAZARDS (INSPECTIONS)

8.1 Periodic Departmental Self Inspections

Self inspections of trade and educational workshops and laboratories, where power equipment and/or hazardous materials are used, are to be conducted on a periodic basis. Laboratory and Shop checklists similar to the ones in Appendix B and C shall be used for this purpose. Appendix D provides inspection checklists of specific subjects/equipment that can also be used. All deficiencies and corrective actions taken shall be appropriately documented.

Upon completion of the inspection, the inspecting employee shall provide the completed inspection checklist or other form of documentation, with findings and corrective actions needed or taken, to the department manager or chair. The department manager or chair shall ensure that any uncorrected safety deficiencies are appropriately addressed.

EH&S recommends that departments conduct inspections semi-annually.

8.2 Periodic Environmental Health & Safety Inspections

8.2.1 EH&S Inspection Goals

Improve the effectiveness of the Campus Safety Program through:

- **Identifying** safety deficiencies, for the purpose of correcting hazardous conditions and/or regulatory violations before unfavorable consequences result,
- **Evaluating** the level of compliance with environmental health and safety training requirements, and
- **Evaluating** the accuracy of health and safety record keeping practices.

8.2.2 Inspection Team Members

One or more of the following members may accompany the EH&S representative:

- The department chair/manager or appointee,
- A member of the department's safety committee (if one has been established), or a member of the department's faculty or staff.

8.2.3 EH&S Inspection Procedure

EH&S may elect to notify the department to be inspected of the time and date of the inspection but is not required to provide notification. All buildings on campus will be included in this procedure. Departments are typically inspected every eighteen months but departments that use hazardous materials or potentially hazardous equipment will be inspected annually.

EH&S will review the department's/program center's safety performance of the previous year (incident statistics, periodic inspection & training records, etc.).

After the physical inspection of the area/facility is completed, EH&S will document the effectiveness of each program center's safety efforts by completing a report that identifies areas needing improvement and provides suggestions on corrective actions to

be taken. The report will be sent to the appropriate coordinator. Currently, EH&S utilizes the Chancellor's Office Risk and Safety Solutions Inspect Software tool to conduct assessments.

8.3 Informal Identification and Correction of Safety Concerns

All employees are expected to take appropriate action to correct hazardous situations that may lead to injury or illness (i.e., correct safety problems under their control, keep work areas free of hazards, notify EH&S or other appropriate supervisors of recognized safety hazards and concerns not under their control).

Safety deficiencies that do not pose a threat of injury, illness or death shall be addressed in a timely manner.

The supervisor shall ensure that known safety deficiencies are appropriately addressed. Supervisors may seek the assistance from EH&S to identify appropriate methods that may be used for addressing deficiencies.

9.0 OCCUPATIONAL INJURY & ILLNESS INVESTIGATIONS

9.1 Reporting Requirements

Employees are required to immediately report to their supervisor, all work-related injuries or illnesses, unless the injury or illness is of such a nature as to render the employee incapable of providing such notification.

Employees who experience serious work-related injuries or illnesses should seek immediate professional medical attention.

California law mandates that fatalities and serious injuries and illnesses be reported to the California Occupational Safety and Health Administration (OSHA) within 8 hours. Title 8 of the California Code of Regulations § 330 (h) defines a "serious injury or illness" as an employment-related incident which results in any of the following:

- 1) Inpatient hospitalization for other than medical observation or diagnostic testing.
- 2) Amputation
- 3) Loss of an eye
- 4) Permanent disfigurement

Exceptions: vehicular accident on a public road

If you become aware of a Sacramento State University employee work-related injury or illness that meets the definition of "serious" as shown above, please immediately contact Risk Management Services at (916) 278-2020 and provide the following information regarding the injured or ill person: 1) *name*, 2) *date of injury or illness*, 3) *birth date, age or approximate age*, 4) *home address and home phone number*, 5) *nature of injury or illness*, 6) *location of incident*, and 7) *a basic description of the incident that resulted in the injury or illness*.

If you are unable to speak directly to a member of Risk Management Services, and the injury or illness meets the definition of “serious”, you are directed to report the “serious injury or illness” to CalOSHA at 916-263-2800.

All other, non-serious, work related injuries or illnesses must be reported within 24 hours to Workers’ Compensation as directed on the “Report of Incident or Accident” (Appendix E).

9.2 Injury and Illness Investigation

For each injury or illness reported, the supervisor, or in the absence of the supervisor, their designee, shall investigate and complete a REPORT OF INCIDENT OR ACCIDENT within 24 hours from the time of the incident (Appendix E).

Completed reports shall be forwarded to Workers’ Compensation (mail stop 6145) or faxed to (916) 278-2641.

Supervisors may seek the assistance of the EH&S Department when conducting an injury or illness investigation. Depending on the seriousness and complexity of the incident, the EH&S Department may elect to conduct an independent investigation.

10.0 SAFETY COMMITTEES

10.1 Executive Safety Committee

10.1.1 Committee Charter

The Executive Safety Committee Committee is charged with the task of developing and recommending to the President of California State University, Sacramento policy, policy changes and other actions related to public and occupational safety and environmental quality within the campus community.

The committee will meet at least three times per year and be chaired by the Associate Vice President for Risk Management Services. The chair is responsible for providing administrative support to the committee. The Chief Financial Officer/Vice President is responsible for administration of these actions.

10.2 Departmental Safety Committees (Optional)

Safety Committees are generally implemented in Departments where potentially serious occupational exposures may exist on a regular basis. Such exposure may result from construction, maintenance, or technical support activities.

Campus organizations that should consider implementing a Safety Committee include: Facilities Services, Theater and Dance, Science Technical Support, etc.

Departmental Safety Committees address the prevention of occupational injuries and illnesses by proactively addressing hazards unique to their work activities and facilities.

Under the direction of the Program Center Dean or Department Head, Safety Committees should consider doing the following:

- **Reviewing** the findings of Audits and Inspections,
- **Participating** with EH&S in the Annual Inspection of their Program Center's or Department's work areas, and addressing corrective actions when safety weaknesses are discovered,
- **Identifying** departmental training needs,
- **Reviewing** work-related accidents (near misses and injuries/illnesses) and providing management with recommendations for corrective action,
- **Considering** employee concerns regarding work-related hazards, and provide management with recommendations for corrective action, and
- **Making** meeting records available to employees.

11.0 RECORDKEEPING

11.1 Training Records

Training records (group safety meetings, included) are maintained in the personnel files of each department. CSU Learn is also used to track completed training. All environmental, health and safety related training is to be entered into CSU Learn.

Employee safety training records are to be maintained for at least one year.

11.2 Inspection Reports

Individual departments shall maintain documentation of self inspections.

EH&S will be responsible for maintaining periodic EH&S inspection reports.

Inspection reports shall be maintained for at least one year.

11.3 Injury and Illness Reports

Report of Incident or Accident shall be forwarded to the Workers' Compensation Manager for review and retention. A copy of the report should also be maintained by the injured/ill employee's department.

Reports of Incident or Accident will be retained for five years following the end of the calendar year the records cover.