



The Injury & Illness Prevention Program

San José State University

Environmental Health & Safety

One Washington Square
San José, California

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1. REGULATORY AUTHORITY

The California State University recognizes Environmental and Occupational Health & Safety as an integral function throughout The California State University system. In accordance with Executive Order 1039 of the California State University, its officers and employees are responsible for developing and maintaining injury & illness prevention programs. This executive order requires every member of the University community to perform their duties in a way that reasonably minimizes hazards and protects health.

The requirements of the Injury & Illness Prevention Program are codified within the California Labor Code, Section 6401.7 and the California Code of Regulations, Title 8, Section 3203 of the General Industry Safety Orders.

2. ADMINISTERING AGENCY

The administering agency is the State of California, Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA).

3. SCOPE

This Policy applies to all San José State University employees, volunteers, students and visitors. It applies to all University programs and activities wherever they occur on- or off-campus. University auxiliary and affiliate organizations are responsible for applying similar practices to their respective businesses and activities.

4. POLICY

San José State University is dedicated to providing a safe, healthful, accessible and sustainable environment for its faculty, staff, students, volunteers and visitors. To the extent within its control, University policy requires the maintenance of an environment and culture that protects the health and safety of the University community and the public against preventable injury or illness. No student, volunteer or employee will be required to perform any task that is determined to be unsafe or unreasonably hazardous.

While the overall responsibility for University health and safety rests with the President, the immediate responsibility for workplace health and safety belongs to each employee who performs a supervisory role. Additionally, individual employees are responsible for preventing accidents within their control. Accordingly, all faculty and staff must ensure that safe and healthful conditions are provided and work practices are followed within the areas under their control. Every member of the University community is expected to cooperate fully with all aspects of the San José State University health and safety programs.

5. OBJECTIVES

An effective Injury & Illness Prevention Program will assist management in determining what hazards exist in the workplace, how to control or correct hazards that may occur, and what steps to take to prevent hazards from recurring.

Implementation of the Injury & Illness Prevention Program facilitates the following objectives:

- 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 that their reports will be given prompt and serious attention.
- Workplace equipment is maintained in safe and good working condition.
- Management follows established procedures to investigate any workplace accidents, near-miss incidents, or reported injuries and illnesses.
- Hazards are corrected as soon as possible after they are identified.
- Employees receive written safety and health rules which are fairly applied to everyone.
- The University develops safe and healthful work practices for each specific job performed by its employees.
- The University ensures that safety rules and work procedures are put into practice and enforced through established disciplinary procedures.
- The University maintains a written plan for what employees will do in case of emergency.

6. RESPONSIBILITIES

At San José State University, the President has delegated overall program management to the Director of Environmental Health & Safety (EH&S Director). The EH&S Director is responsible for the development, implementation and maintenance of the program under the direction of the Associate Vice President of Facilities Development & Operations Department within the Administration & Finance Division.

The EH&S Department has a web presence located at <https://www.sjsu.edu/fdo/services/ehs/index.php>. Employees can access Injury & Illness Prevention Program information through the Health & Safety tab of this webpage.

6.a. Environmental Health & Safety (EH&S)

It is the responsibility of the EH&S Director to develop, implement, manage and maintain the Injury & Illness Prevention Program. This includes the following responsibilities as outlined below:

- Provide consultation to Department Deans, Directors, Chairpersons and Coordinators regarding program compliance.
- Consult on issues of hazard identification and evaluation; procedures for correcting unsafe conditions; systems for communicating with employees; regularly scheduled safety meetings; employee training programs; compliance strategies; and recordkeeping.
- Provide centralized monitoring of University activities on a consultative basis in the areas of biological safety, chemical hygiene, emergency preparedness, fire safety, hazard communication, hazard identification, hazardous materials management, industrial hygiene, medical surveillance, occupational safety, pest management, public health & sanitation, radiation safety, risk management and safety education & training.
- Maintain centralized environmental and employee monitoring records, allowing employee access as directed by law.
- Provide access to the written Injury & Illness Prevention Program within five business days after receiving a request for access from an employee or designated representative. An electronic copy can be accessed by the public at <https://www.sjsu.edu/fdo/services/ehs/resources-and-training/iipp.php>.

6.b. Deans, Directors, Department Chairs, Department Heads

It is the responsibility of Deans, Directors, Department Chairs and Department Heads to develop departmental procedures to ensure effective compliance with the Injury & Illness Prevention Program and other University health and safety policies as they relate to operations under their control. 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, volunteers and students in general safe work practices specific to their duties. Such education and training shall take place prior to initial assignment to complete each potentially hazardous task.
- Instruct employees, volunteers and students in the recognition and avoidance of unsafe conditions, including hazards associated with non-routine tasks and emergency operations.
- Develop a system of recordkeeping to document all employee, volunteer and student education and training activities. Safety documentation recordkeeping should also incorporate injury reports, incident reports, safety complaints or grievances involving safety issues.
- Permit only those employees, volunteers or students qualified by training to operate potentially hazardous equipment and/or to handle potentially hazardous materials. Do not assume that newly hired, newly assigned or reassigned employees, volunteers or students comprehend all safety protocols associated with new duties.
- Develop and maintain an inventory of hazardous materials and equipment present in department work areas.
- Request a Safety Data Sheet (SDS) from the manufacturer when procuring suspected hazardous materials or a safety manual when procuring suspected hazardous equipment.
- Post in a conspicuous location appropriate safety notices or procedures.
- Implement a periodic EH&S inspection program for facilities and hazardous activities under their control.

- Develop methods, as appropriate, to provide hazard notifications to outside contractors' employees who work in areas under department jurisdiction.
- Designate staff that will be responsible for serving as the department safety coordinator, acting as liaison with EH&S and advising the Dean, Director, Department Chair or Department Head.
- Assign facilities for hazardous activities only if adequate safety controls and equipment are in place.
- Establish disciplinary procedures which help ensure that relevant safety rules and work procedures are put into practice and enforced.

6.c. Principal Investigators, Instructors & Supervisors

It is the responsibility of Principal Investigators, Instructors and Supervisors to develop local area procedures to ensure compliance with the Injury & Illness Prevention Program as it relates to operations under their control. Specifically, these individuals will:

- Track employee, volunteer and student education and training following University and department guidelines.
- Identify and correct of unsafe conditions in their work areas including reporting to relevant department leadership, safety staff and compliance staff when required.
- Develop and maintain written workplace procedures which conform to University and departmental guidelines.
- Ensure that each employee, volunteer or student adheres to adopted procedures. Establish disciplinary procedures which conform to University and departmental guidelines to help ensure that relevant safety rules and work procedures are put into practice and enforced.
- Instruct employees, volunteers and students in the recognition and avoidance of unsafe conditions, including hazards associated with non-routine tasks and emergency operations.
- Permit only those employees, volunteers or students qualified by training to operate potentially hazardous equipment and/or to handle potentially hazardous materials. Do not assume that newly hired, newly assigned or reassigned employees, volunteers or students comprehend all safety procedures associated with new duties.
- Include costs for required engineering controls, personal protective equipment, and specialized safety requirements into project planning. Work with department or college leadership to ensure required safety precautions are implemented before starting potentially hazardous projects.
- Maintain an inventory of hazardous materials and equipment present in their work areas.
- Request a Safety Data Sheet (SDS) from the manufacturer when procuring suspected hazardous materials or a safety manual when procuring suspected hazardous equipment.

6.d. Department Safety Coordinators

Department Safety Coordinators are appointed by each Dean, Director, Department Chair or Department Head and are critical to the implementation of the Injury & Illness Prevention Program. Specifically, these individuals will:

- Assist the Dean, Director, Department Chair or Department Head in the development and implementation of a college or department Injury & Illness Prevention Program.
- Serve as liaison with EH&S and other associated University departments.
- Conduct or arrange for safety education and training of employees, volunteers or students.
- Conduct periodic inspections of facilities, equipment and projects to identify unsafe conditions and practices.
- Make recommendations, initiate and document corrective actions regarding identified hazards or deficiencies.
- Serve as the primary department resource person for coordinating inspections, accident/injury investigations, safety education and training, safety/compliance reports and related technical consultations.
- Ensure maintenance of department records related to training, accident/injury, monitoring and pertinent data.

6.e. Employees

Employees are responsible for reading and complying with procedures and guidelines provided by their supervisors. Employees shall attend established education and training sessions and are expected to understand and comply with all applicable safety requirements. Failure to comply with established safety rules may be reflected in performance evaluations and may lead to disciplinary action.

Employees are responsible for asking questions of their supervisors when there is concern about an unknown or hazardous situation. Employees are encouraged to inform their supervisors of workplace hazards without fear of reprisal. If there is a perception that this is not possible, workplace hazards may be reported to EH&S (ehs@sjsu.edu).

6.f. Students and Volunteers

Students are expected to always adhere to safety practices presented by faculty, technical staff, student assistants, graduate assistants or other authorized individuals. Students and volunteers must report workplace hazards they discover to their supervisors or other responsible parties such as EH&S (ehs@sjsu.edu). Failure to comply with established safety rules may result in loss of facilities access and may impact performance evaluation.

7. COMPLIANCE GUIDELINES

All employees shall adhere to safe and healthy work practices defined by established University and departmental EH&S guidelines. Failure to do so will result in the initiation of disciplinary measures defined in the collective bargaining agreement for the employee's bargaining unit or the MPP & C99 Guidelines (<https://www.sjsu.edu/up/mycareer/employee-labor-relations/index.php>).

All students and volunteers shall adhere to the specialized safety requirements that are relevant to the hazards they utilize in research, teaching and service.

Colleges, departments and safety committees can establish enforcement consequences as a part of University and departmental EH&S guidelines. Consequences for noncompliance may include but are not limited to: confiscation of hazardous materials or equipment, revoked access to hazardous facilities and deauthorization to work with particularly hazardous or specially regulated materials. University and departmental EH&S guidelines can provide opportunities to reestablish privileges to conduct hazardous work by completing corrective actions after an instance of noncompliance.

8. SAFETY COMMUNICATIONS

Methods of communicating with employees on matters relating to health and safety are established as summarized below:

8.a. Managers and Supervisors

Managers and supervisors will encourage employees to report any unsafe or unhealthy conditions they discover without fear of reprisal.

8.b. Safety Training

The University provides training for employees based on their general work requirements. Training topics include New Hire Orientation, First Aid, Cardiopulmonary Resuscitation (CPR), Automated External Defibrillator (AED), Hazard Communication, Emergency Preparedness and Defensive Driving.

Departments provide job specific training for employees prior to assignment on a new job or when work assignments change. Refresher training is provided based on regulatory requirements for topics such as Confined Space Entry, Lockout, Asbestos Management, and Lead Management.

8.c. CSULearn Learning Management System

The Learning Management System, CSULearn, is deployed as the EH&S online learning management system for the University. The CSULearn library contains online training courses in environmental protection and occupational health & safety topics. Training records are automatically maintained in the CSULearn system at the completion of the course. Employees and students can access CSULearn by logging into this website with their SJSUOne credentials:

<https://www.sjsu.edu/fdo/services/ehs/resources-and-training/csu-learn-online-training.php>

8.d. University Safety Advisory Committee

The University Safety Committee is established to achieve effective communications between labor and management in order to resolve health and safety related problems. The EH&S Director leads the committee, schedules quarterly committee meetings, provides meeting agendas and minutes, solicits agenda items from committee members and identifies resources for resolving complex safety issues in coordination with the appropriate University administrators.

Safety committee meetings are referenced in the following collective bargaining agreements. Designated representatives from the bargaining units are members.

- CSU Employees Union (CSUEU) Collective Bargaining Agreement Article 23.9
CSUEU Units 2, 5, 7, and 9
- California Faculty Association (CFA) Collective Bargaining Agreement Article 37.8
CFA Unit 3
- State Employees Trades Council (SETC) Collective Bargaining Agreement Article 28.12
SETC Safety Steward Unit 6
- Academic Professionals of California (APC) Bargaining Agreement Article 31.8
APC Unit 4

Other members may be drawn from representatives of University departments and auxiliary organizations such as:

- Human Resources
- EH&S
- University Police
- Emergency Preparedness
- Student Housing Services
- Associated Students
- Spartan Shops
- Student Union and the Event Center

8.e. Bargaining Units Safety Steward

Each bargaining unit represented at San José State University may designate a safety steward who shall represent the safety interests of bargaining unit employees. They may attend safety committee meetings and submit agenda items related to health and safety. Safety Stewards are empowered to bring forward and help resolve safety concerns to appropriate administrators and/or to the Director of EH&S.

8.f. Department Safety Coordinators

Assist the Dean, Director, Department Chair or Department Head to communicate the Injury & Illness Prevention Program to the members of a college or department.

9. ENVIRONMENTAL HEALTH & SAFETY (EH&S) INSPECTIONS

An EH&S inspection program is essential in order to reduce unsafe conditions that may damage property or expose faculty, staff, students, volunteers and visitors to incidents that could result in injury.

9.a. Scheduled Workplace Inspections

It is the responsibility of each department to ensure that a regular and systematic inspection process be scheduled for all departmental areas. The Dean, Director, Department Chair or Department Head should assign departmental safety coordinators and other knowledgeable employees to conduct these inspections. The EH&S department provides colleges and departments assistance to develop inspection checklists for the facilities under their control.

EH&S requires, at a minimum, annual inspections for all facilities that are authorized for hazardous activities, materials, and/or equipment by the Dean, Director, Department Chair or Department Head. Facilities that are authorized for temporary storage, use or disposal of hazardous materials must be included in these annual inspections. Inspections for laboratory and workshop facilities must be tracked using the RSS Inspect software which is available to department safety coordinators. If repeat or pervasive safety and/or compliance issues are observed during the inspections, the Director of EH&S may require more frequent inspections in order to ensure timely correction of identified deficiencies and sustained compliance with applicable safety requirements.

9.b. Scheduled Workplace Inspections by the Office of the State Fire Marshal

Title 19 of the California Code of Regulations requires that all State Buildings be inspected annually by the Office of the State Fire Marshal. EH&S accompanies the Deputy State Fire Marshal during the inspection of all buildings and rooms for fire safety compliance and coordinates the completion of corrective actions campus wide.

10. REPORTING WORK RELATED INJURIES & ILLNESSES

This section summarizes information from the University Personnel Policy on Occupational Injury or Illness Reporting (available at: <https://www.sjsu.edu/up/resources/forms-and-documents/forms-by-unit/workers-compensation.php>) and the Risk Management Student and Visitor Accident Reporting Guidelines (available at: <https://www.sjsu.edu/fabs/services/risk/accidents.php>). For more information or questions, employees can contact University Personnel about workers' compensation. More information for employees is also available from the State of California Division of Workers' Compensation Information & Assistance Unit at 1-800-736-7401. Students, volunteers or visitors can contact Risk Management to learn more about accident/incident follow-up resources.

10.a. Immediate Medical Treatment

Employees should follow University Personnel procedures for obtaining first aid, urgent care or emergency medical treatment for work-related injuries or illnesses. In the event of an accident or injury, the highest priority must always be caring for yourself. Minor injuries or illnesses requiring only first aid may be treated through available campus resources during normal business hours, as appropriate. Injuries or illnesses requiring additional medical evaluation or treatment shall be referred to an appropriate urgent care or emergency medical facility. Information regarding authorized medical treatment locations and procedures is provided by University Personnel (available at: <https://www.sjsu.edu/up/resources/help/workers-compensation/seeking-medical-attention.php>). This resource also highlights medical care facilities near the Moss Landing Marine Laboratories.

10.b. Serious Injuries, Illnesses, and Fatalities

Serious occupational injuries, illnesses or fatalities involving an employee and occurring on the job or in connection with University work shall be reported immediately to University Police, who will notify EH&S. EH&S is responsible for making notifications to Cal/OSHA when required by applicable law and regulation.

For purposes of this notification requirement, "immediately" means within eight (8) hours of when the supervisor knows or should have known that the injury or illness is serious. A serious injury or illness includes a medical condition that requires inpatient hospitalization for more than 24 hours for reasons other than observation, results in the loss of a member of the body (amputation), or results in a serious degree of permanent disfigurement.

Employees must report the injury immediately to your Appropriate Administrator or his/her designee. Within 24 hours, the Appropriate Administrator or his/her designee completes the Employer's Report of Occupational Injury or Illness Form and provides the Workers' Compensation Claim Form (DWC 1) and Notice of Potential Eligibility to the employee. Forms are available from University Personnel at: <https://www.sjsu.edu/up/resources/forms-and-documents/forms-by-unit/workers-compensation.php>

If a workers' compensation claim proceeds, the employee must provide all Physician medical Work Status Reports to their Appropriate Administrator or his/her designee and the Workers' Compensation Specialist in Human Resources.

Students, Volunteers, or Visitors must complete the Student and Visitor Accident Reporting form once the accident/incident is under control. Within 24 hours of the accident/incident, the supervisor of the injured individual or another responsible party must send the Student and Visitor Accident Reporting form to Risk Management. Forms are available from Risk Management at: <https://www.sjsu.edu/fabs/services/risk/accidents.php>

11. ACCIDENT INVESTIGATION

Work-related accidents, injuries, illnesses, and other significant safety incidents shall be investigated as appropriate to determine contributing factors and identify corrective actions that may prevent recurrence.

Supervisors are responsible for initiating investigations of incidents that occur within operations under their control. EH&S may participate in or lead investigations involving serious injuries or illnesses, significant hazards, regulatory reporting requirements, recurring incidents, or other circumstances warranting additional review. Investigations should evaluate, as applicable:

- the work activity being performed;
- equipment, materials, and environmental conditions involved;

- applicable procedures and work practices;
- training and supervision;
- contributing or underlying factors; and
- corrective actions necessary to eliminate or reduce identified hazards.

Corrective actions identified through an investigation shall be assigned, documented, and tracked to completion as appropriate. Departments are responsible for implementing corrective actions within their areas of control, with EH&S providing consultation and technical assistance as needed.

Incident investigations are intended to identify causes and opportunities for prevention rather than to assign blame. Investigation records shall be maintained in accordance with applicable University recordkeeping requirements.

In general, similar investigation protocols and expectations are in place for incidents/accidents involving students, volunteers, and visitors as outlined in the Risk Management Student and Visitor Accident Reporting Guidelines (available at: <https://www.sjsu.edu/fabs/services/risk/accidents.php>).

12. HAZARD CONTROL PROCEDURES

Inspection and Audit Reports: Upon completion of scheduled inspections and audits, all findings will be prepared in writing and submitted to EH&S and the applicable responsible personnel. Corrective action or a suitable timetable for elimination of a hazard (where appropriate) is the responsibility of the applicable Dean, Director, Department Chair, Department Head, Principal Investigator, Instructor, or Supervisor. EH&S will assist by obtaining subject matter expertise in the development of corrective actions and securing University-wide funding where appropriate and necessary.

Hazard Classification: Once identified, hazards will be ranked according to risk based on both consequence/severity and probability/frequency of occurrence. Prioritization of abatement actions will be based on risk. Serious violations and hazards should always be given top priority and be corrected immediately or consideration should be given to stopping operations affected by the violations or hazards.

Imminent Hazard Situations: Individuals that discover a condition that presents an imminent hazard to health or safety while conducting a safety inspection or audit shall immediately notify EH&S and the applicable Deans, Directors, Department Chairs, Department Heads, Principal Investigators, Instructor or Supervisors. The applicable Dean, Director, Department Chair, Department Head, Principal Investigator, Instructor or Supervisor shall inform all employees of any such imminent hazard(s) that cannot be corrected immediately and ensure that all necessary precautions are taken to prevent mishaps.

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; for example, an employee is working on an electrical line without shutting off the power.

Hazard Control Hierarchy: Effective hazard control follows the hierarchy of controls listed below from most effective to least effective. The most effective means of control is to eliminate the hazard if possible. If this cannot be accomplished, the next most effective means is to engineer out the hazard such as by providing exhaust ventilation or machine guards. If engineering controls to eliminate the hazard are not feasible, then warnings must be given such as signs, labels or alarms. Training and administrative controls, such as personal protective equipment, should be considered as the last resort when all other means of control are not completely effective.

- **Elimination or Substitution:** such as alternatives to reduce energy, lower speeds or replace hazardous materials
- **Engineering Controls:** such as ventilation, machine guarding or interlocks
- **Warnings:** such as odor in natural gas, signs, labels, horns or beepers
- **Training and Administrative Controls:** such as job procedures, rotating workers, lockout or confined space entry
- **Personal Protective Equipment:** such as safety glasses, respiratory protection, back belts or ear plugs

13. EMPLOYEE HEALTH & SAFETY TRAINING

Effective dissemination of safety training, rules and procedures is important to the success of the Injury & Illness Prevention Program. It is necessary to provide training for employees concerning general safe work practices as well as

specific instruction with respect to hazards unique to each employee's job assignment. 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, procedures or equipment are introduced to the workplace which represents a new hazard or whenever the supervisor receives notification of a new or previously unrecognized hazard. All training will be documented in writing. Topics, participants and dates will all be recorded and kept on file within each department.

13.a. New Hire Orientation

All new employees receive their initial orientation to the Injury & Illness Prevention Program during New Hire Orientation provided by EH&S office via the CSULearn Learning Management System. The topics covered in the training include: the Injury & Illness Prevention Program; Hazard Communication; Injury & Illness Reporting Requirements; and Reporting and Correcting Unsafe Conditions.

13.b. Safe Work Practices for Specific Departments

Employees shall receive safety training appropriate to the hazards associated with their assigned duties and work environment. Required training is identified through the University's Safety Training Matrix based on factors including job classification, assigned duties, workplace hazards, regulatory requirements, and other applicable safety program requirements. The Safety Training Matrix is maintained by EH&S in coordination with affected departments and is reviewed and updated as necessary to reflect changes in regulatory requirements, job functions, equipment, processes, and recognized workplace hazards.

Where applicable, required safety training is assigned through the learning management systems based on established job and training criteria. Departments and supervisors remain responsible for identifying job-specific or task-specific hazards that may require training beyond centrally assigned courses and for ensuring employees receive such training before performing affected work.

Training shall be provided when required by applicable regulation, including when employees are newly hired or assigned duties for which they have not previously received appropriate training, and when new or previously unrecognized hazards are introduced or identified.

Completion of required training shall be documented and records maintained in accordance with applicable University requirements and regulatory standards.

14. RECORDKEEPING

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.

14.a. University Accidents, Injuries & Illnesses

It is essential that records for all accidents, injuries and illnesses occurring either on University property or at off-campus University sponsored events are maintained and analyzed by Risk Management. Complete records of all incidents involving bodily injury and property damage accidents involving employees, students, volunteers, and/or visitors are maintained and analyzed for accident prevention and University liability purposes by Risk Management. It is essential that all such incidents be reported immediately and in writing to Risk Management.

Reports of accident and injury incidents may be generated by EH&S (hazardous material spills, environmental releases, etc.), the University Police Department (accidents involving the campus community, traffic accidents, state driver accidents, etc.), Institutional Safety and Compliance Committees, Housing Office (resident accidents, intramural sports, etc.), the Athletic Department (athletic trainer reports, etc.) and Student Health Services (student injuries, doctor's first report of industrial injury or illness, etc.).

Statistics and other information from these records are available to departments for use in accident prevention efforts. Departments should also maintain and analyze records of accidents occurring in their own area of operations.

14.b. Occupational Injuries & Illnesses

The University will record and report within five (5) days every employee injury or illness unless disability resulting from such injury or illness does not last through the day or does not require medical service other than minor first-aid treatment.

Records of occupational injuries and illnesses will be kept on file in University Personnel and will be made available for review by Cal/OSHA at any time, for a period of five (5) years.

The Cal/OSHA summary for the previous year will be posted by University Personnel in a conspicuous place on campus for review by employees.

Employee injuries and illnesses will be recorded and analyzed each calendar quarter by University Personnel. These statistics are first submitted to the CSU Office of the Chancellor and from there to the Governor's Safety and Workers' Compensation Program.

University Personnel updates and maintains the OSHA 300 log.

14.c. Employee Exposure Records

Each employee exposure record will be preserved and maintained for at least thirty (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 reveals where and when used and the identity of a toxic substance or harmful physical agent.

Departments using any regulated carcinogens have additional reporting and recordkeeping requirements under Cal/OSHA.

14.d. Medical Records

The medical record for each employee will be preserved and maintained for at least the duration of employment plus thirty (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; first aid records; descriptions of treatments and prescriptions; and employee medical complaints.

14.e. 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 Injury & Illness Prevention Program.

They must include:

- Records of scheduled and periodic inspections to identify unsafe conditions and work practices. The documentation includes the name of the person(s) conducting the inspection, the unsafe conditions and work practices identified, and the corrective action(s) taken. These records will be maintained for at least three years.
- Documentation of health and safety training for each employee. Specifically, employee name or other identifier, training dates, type(s) of training and the name of the training provider will be included. Records will be retained for at least three years. Training records will be kept in each department and in EH&S as appropriate.

15. EMPLOYEE ACCESS TO EXPOSURE & MEDICAL RECORDS

The University recognizes that employees and their designated representatives and authorized representatives of the Chief of 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.

16. WORK SPECIFIC PROGRAMS

Programs incorporated into the overall University Injury & Illness Prevention strategy exist for which EH&S has established oversight. This helps ensure that adequate EH&S measures are taken. Existing programs are outlined below:

16.a. Academic Safety: College Laboratories, Workshops, and Field Work Safety Programs

The Office of the Dean for each college reviews teaching, research, service, and technical support activities for hazards to ensure compliance with relevant safety and compliance programs. Periodic safety inspections are also coordinated by the Office of the Dean for each college in collaboration with EH&S. The Office of the Dean may delegate the academic activity safety review and safety inspection responsibilities to department safety coordinators, department chairs, technical staff, and/or faculty safety committees.

Specialized safety review for academic activities is available from the following institutional committees and officers. These safety and compliance entities also provide support to facilities, medical, athletics, and other operations as appropriate.

- Institutional Review Board for human subject research (<https://www.sjsu.edu/research/research-compliance/irb/index.php>)
- Institutional Animal Care and Use Committee for vertebrate animal research and teaching (<https://www.sjsu.edu/research/research-compliance/iacuc/index.php>)
- Institutional Biosafety Committee for Biosafety Level 2 and/or recombinant nucleic acid research and teaching (<https://www.sjsu.edu/research/research-compliance/ibc/index.php>)
- Laser Safety Officer for Class 3b and 4 laser research and teaching as described in the Laser Safety Plan (<https://www.sjsu.edu/fdo/services/ehs/laboratory-safety/laser-safety.php>)
- Chemical Hygiene Officer for hazardous materials used in research and teaching as described in the Chemical Hygiene Plan (<https://www.sjsu.edu/fdo/services/ehs/laboratory-safety/chemical-hygiene.php>)
- Health Physics Committee and Radiation Safety Officer: Review and oversee ionizing radiation use protocols in accordance with the University's broad scope license to ensure safety, regulatory compliance, and radiation exposures as low as reasonably achievable (ALARA).
- Field Safety is supported collaboratively by technical experts within relevant departments, EH&S staff, and Office of Research Compliance staff.

16.b. Contractor Safety

The Planning, Design Construction Office of the Facilities Development & Operations Department incorporates Contractor Safety as an integral element of the construction contract and provides that contractors and their employees, when on campus premises, perform their work in accordance with federal, state and local regulations in such a manner as to complement the University's efforts to prevent accidents and control losses. The University has established a uniform policy and rules to be followed when having work performed by contractors and service representatives. Acceptance of these rules and agreement to honor them is included in all contracts awarded to independent contractors. The Construction and Contractor Safety Program is administered by the EH&S Construction Safety Specialist and is available at: <https://www.sjsu.edu/fdo/services/ehs/health-and-safety/construction-safety.php>

16.c. Emergency Preparedness

The University Emergency Preparedness Program is intended to provide a consistent and adequate means of handling a variety of emergencies. The goals of the program are the preservation of life, the protection of property, and continuity of campus operations. University personnel, students and the public are informed of and included in the preparedness and response strategy such as through the Emergency Preparedness website available at: <https://www.sjsu.edu/police/emergency-preparedness/index.php>.

The San José State University Emergency Management Plan outlines the actions to be taken by the University in response to emergency situations, including:

- Emergency escape routes and procedures for evacuations;

- Procedures for employees who must remain to operate critical operations before they can evacuate the facilities;
- Procedures to account for all employees following the evacuation;
- Procedures for employees who are involved with rescue and medical duties;
- Means of reporting fires and other types of emergencies; and
- Names or job titles of persons who can be contacted about the emergency action plan.

16.d. Campus Safety & Violence in the Workplace

The University Police Department is committed to providing a safe and secure learning environment through professional, progressive and superior police, emergency, transportation and educational services in alliance with the campus community. The campus safety plan and program activities are located on the [UPD website](#). The Workplace Violence Prevention Plan is available at: <https://www.sjsu.edu/fdo/services/ehs/health-and-safety/workplace-violence-prevention.php>

16.e. Fire & Life Safety

The Fire and Life Safety Program administered by the Facilities Development & Operations Maintenance department provides for a fire prevention plan; established practices and procedures to control potential fire hazards and ignition sources; installation and maintenance of fire protection equipment and systems; regular portable fire extinguisher inspections and maintenance; and employee training on the use of fire extinguishers and fire protection procedures.

The Office of the State Fire Marshal conducts an annual Fire Prevention Inspection of all buildings on campus in accordance with Title 19 of the California Code of Regulations. The inspection focus is on maintaining a clear means of egress, electrical power distribution systems, fire alarm system testing and the removal of any accumulation of combustibles. The EH&S Office coordinates the inspection schedule with the Office of the State Fire Marshal and the campus community as well as ensuring that corrective action is taken to remedy infractions found during the inspection.

16.f. Hazard Communication

The Hazard Communication Program administered by EH&S provides for:

- A list of hazardous substances used in each workplace;
- A system of labeling containers;
- Material safety data sheets for each hazardous substance used; and
- A comprehensive training program for employees that use hazardous materials.

16.g. Hazardous Materials Management

Hazardous Material Management is administered by EH&S and provides that employees are trained in the safe procurement, transportation, handling, storage and disposal of hazardous materials. To this end, adequate safety equipment is provided in the workplace and properly maintained; employees are required to use personal protective equipment and clothing when handling hazardous materials; hazardous materials are properly labeled and stored; safe emergency response procedures have been established; ventilation equipment is properly used and maintained; and hazardous wastes are managed in a safe and efficient manner.

16.h. Occupational Health & Safety

The University Occupational Safety Program administered by EH&S provides for safe working/walking surfaces, adequate illumination, proper maintenance of tools and other equipment, proper guarding of machinery, an electrical safety program, a lockout/tag out procedure for all energized systems, safe use and storage of compressed gas, a confined space entry procedure, equipment and procedures for the safe handling of materials, and a vehicle and driver safety program.

- Asbestos in Construction Materials
- Bloodborne Pathogens Control Program
- Confined Space Entry Program
- Driver Safety

- Electrical Safety & Energy Control – Lockout Tagout
- Ergonomics
- Fall Prevention
- Job Hazard Analysis and Personal Protective Equipment Selection
- Lead in Paint Program
- Machine Shop Safety
- Hearing Conservation
- Respiratory Protection

16.i. Pest Management

The Pest Management Program, administered with the Grounds and Landscaping department within FD&O and coupled with Student Housing, provides for the control of insect, rodent and other pest infestations in work, residential, food establishment, agricultural and landscape areas. Facility inspections; medical monitoring and training programs for users; safe procurement, transportation, storage, use and disposal of pesticides; recordkeeping; and application of environmentally safe control measures are maintained.

16.j. Food Sanitation

The Food Sanitation Program is managed by the Student Housing and Student Union Auxiliaries and provides for regular inspections of all housing and food establishments on campus to ensure that operations and facilities are in conformance with state and local public health codes.

16.k. Drinking Water Quality

The purity of all drinking and swimming pool water is monitored by EH&S and coupled with the FD&O Plumbing department and the Aquatics Center to guard against the presence of harmful bacteria and other water contaminants. The campus receives its potable water supply from San Jose Water Company.

16.l. Risk Management

The Risk Management Program, managed within the Finance department, 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, and acquiring coverage; development and implementation of risk management and loss control policies; liaison with the State Office of Insurance and Risk Management; and coordination of a variety of risk management operations for the University.

17. ANNUAL REPORT

The EH&S Director shall provide an Annual Health and Safety Program Report to the University President with a copy to the System wide Office of Risk Management in accordance with the CSU Executive Order 1039. Items to consider for the report include:

- Review of significant events
- Program trends
- Status reports for key program areas (e.g. training, inspections etc.)
- Performance data

18. PROGRAM REVIEW

The Injury & Illness Prevention Program is reviewed annually and updated to reflect changes in campus environments and management systems by EH&S.

19. DOCUMENT HISTORY & CONTROL

The San José State University Injury & Illness Prevention Program described herein supersedes all prior written Injury & Illness Prevention Program documents.

Rev #	Document Revision History	Document Controller	Reviewer	Date
01	To align the IIPP in accordance with CSU Model IIPP and CSU EO 1039	David Krack, Director EH&S	Mark Loftus, Manager Risk Management	August 9, 2013
02	Update the IIPP	David Krack, Director EH&S	Matt Nymeyer, Interim Associate Director, EH&S	October 10, 2017
03	Update the IIPP	Matt Nymeyer, Director, EH&S	Lisa Torralba, Environmental Compliance Specialist	December 6, 2019
04	Update to include employee access to IIPP-Cal OSHA update	Lisa Torralba, Environmental Compliance Specialist, EH&S	Matt Nymeyer, Director, EH&S	March 15, 2021
05	Add Covid Prevention Procedures addendum	Matt Nymeyer, Director, EH&S	None	June 30, 2023
06	Remove Covid amendment, revisions for improvement and accuracy	Matt Nymeyer, Director, EH&S	Skye Kelty, Chemical Hygiene Officer, EH&S	August 14, 2026