

INJURY AND ILLNESS PREVENTION POLICY & GUIDELINES (IIPP)

INTRODUCTION

The University of St. Augustine for Health Sciences (USAHS) is committed to providing a safe and healthful work environment for all employees, to include faculty, staff and student workers. To support our commitment, we have developed the USAHS Injury and Illness Prevention Plan (IIPP). The IIPP describes procedures and safeguards designed to help protect you from the risks of injury or illness at work. By making employee safety a high priority for every USAHS employee, we can reduce injuries and illnesses, increase productivity and promote a safer and healthier environment for all.

GOALS

The goals of the program are:

1. Protect the health and safety of employees. Decrease the potential risk of disease, illness, injury, and harmful exposure to USAHS employees.
2. Reduce worker's compensation claims and costs.
3. Improve employee morale and efficiency as employees see their safety is important to management.
4. Minimize the potential for penalties assessed by various enforcement agencies by maintaining compliance with health and safety codes.

RESPONSIBILITY

Supervisors are responsible for enforcement of the IIPP among the employees under their direction by carrying out the various duties outlined herein, setting acceptable safety policies and procedures for employees to follow, and ensuring that employees receive the general online safety training offered through the Learning Management System, and which is titled Injury and Illness Prevention. Each supervisor must also ensure that the appropriate job-specific safety training is received and completed on annual basis. Supervising others also carries with it the responsibility for knowing how to safely accomplish the task assigned to each employee, for providing appropriate personal protective equipment, and for evaluating employee compliance.

Immediate responsibility for workplace health and safety rests with each individual employee. Employees are responsible for following established work procedures and safety guidelines in their area, as well as those identified in this IIPP.

The Facilities Department with cooperation from Human Resources is responsible for developing and managing this IIPP policy, plan and training protocol. Additional responsibilities

include providing consultation to the USAHS community on matters of health and safety, monitoring and advising employees using hazardous materials, interpreting external regulations, and recommending appropriate compliance strategies. The Facilities Department with cooperation from Human Resources will lead safety committee meetings that will be held four times per year.

COMPLIANCE

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly.

All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.

Non-Compliance will be addressed by:

- An immediate discussion between the supervisor and the employee who is discovered working in an unsafe manner.
- Appropriate disciplinary action up to and including dismissal.

COMMUNICATION SYSTEMS

Effective two-way communication that involves employee input on matters of workplace safety is essential to maintaining an effective IIPP. To foster better safety communication the following guideline will be implemented:

Supervisors will provide time at specific periodic staff meetings to discuss safety topics. Status reports will be given on safety inspections, hazard mitigation projects, and accident investigation results as well as feedback to previous employee suggestions. Employees will be encouraged to participate and give suggestions without fear of reprisal.

Employees are encouraged to bring to their Supervisor's (or Human Resources, Facilities) attention any potential health or safety hazard that may exist in the work area.

Employees are advised that there are no reprisals for expressing a concern, comment, suggestion, or complaint about a safety matter and that adherence to safe work practices and proper use of personal protective equipment are integral parts of workplace safety.

Supervisors will follow-up on all suggestions and investigate the concerns brought up through these communication methods, utilizing the Facilities Department assistance if needed. Feedback to employees is critical and must be provided for effective two-way communication.

OSHA POSTERS – These posters are located in break rooms, or on Human Resources Department bulletin boards.

TRAINING – Administered through the compliance Learning Management System, training is provided to employees to present safety information and relevant updates. Training is provided, but not limited to, New Hire Orientation, regularly scheduled training sessions, Departmental or Group meetings, and refresher training sessions.

Anonymous Hazard Notification by Employees

Open communication between employees and managers is expected and strongly encouraged by management. Employees should address their safety concerns with their immediate manager or supervisor without fear of reprisal. Incidents and near misses must also be reported to the manager or the Campus Director and an incident report should be completed within 24 hours. However, if an employee desires to provide anonymous notification of a safety hazard, they may do so by contacting the Campus Director or facilities through interoffice mail.

Employee notifications should indicate:

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

IDENTIFICATION AND EVALUATION OF WORKPLACE HAZARDS

A health and safety inspection program is essential in order to reduce unsafe conditions that may expose faculty, staff, students, and visitors to incidents that could result in personal injuries or property damage. It is the responsibility of the Facilities Department to ensure that appropriate, systematic safety inspections are conducted periodically.

Periodic Inspections

Periodic inspections are performed to identify and evaluate workplace hazards in all areas of the university. Laboratory safety inspections occur periodically and no less than quarterly. On a semi-annual basis, the Facilities Department conducts facility inspections to assess workplace hazards in the office area, electrical and mechanical rooms, exterior building area, and common place areas (e.g. break rooms). Employees and managers participate in the process of hazard assessment and correction. Additional inspections and/or risk assessment will be performed when:

- New, previously unidentified hazards are recognized or discovered
- Occupational injuries or illnesses occur
- Workplace conditions warrant an inspection or on an as needed basis

- New substances, processes, procedures, or equipment are introduced into the workplace and may present potential new hazards
- In the event of a campus closure due to natural disasters such as fire or hurricanes the Facilities Department will conduct an inspection before employees and students may reenter the premises.

INVESTIGATION OF OCCUPATIONAL INJURY, ILLNESS OR EXPOSURE TO HAZARDOUS SUBSTANCES OR AGENTS

Accident/Incident Investigations

The Facilities Department in conjunction with Human Resources will investigate all accidents, injuries, occupational illnesses, and near-miss incidents to identify the contributing factors or associated hazards.

Procedures for investigating workplace accidents and hazardous substance exposures include:

1. Interviewing injured workers and witnesses
2. Examining the workplace for factors associated with the accident/exposure
3. Determining the cause of the accident/exposure
4. Taking corrective action to prevent the accident/exposure from reoccurring
5. Recording the findings and actions taken.

All accident investigations will be documented utilizing the **Incident Form** to record pertinent information. Human Resources will retain the original document and will record on an accident log. While OSHA 301 reporting is not required, it is recommended as best practice to maintain the report. Human Resources will report employee accidents to the Workers' Compensation Carrier. The Facilities Department will retain a copy to serve as proper documentation.

Subsequent to the investigation, appropriate repairs or procedural changes will be implemented promptly to mitigate the hazards implicated, as appropriate.

Serious occupational injuries, illnesses or exposures to hazardous substances as defined by OSHA, must be reported to the Facilities Department no later than eight hours after they become known to the supervisor. These include injuries that cause permanent disfigurement or require hospitalization for a period in excess of 24 hours. The Facilities Department will coordinate and inform the Human Resources Department prior to contacting OSHA, if necessary.

Hazard Mitigation

All hazards identified will be promptly investigated and alternate procedures implemented as indicated. USAHS recognizes that hazards range from hazards of relatively low risk to imminent dangers. Corrective actions or plans, including suitable timetables for completion, are the

responsibility of the department. Facilities Department consultation is available to determine appropriate abatement actions.

For serious hazards that present an imminent danger to life or limb, immediate action will be taken to mitigate the hazard. The Facilities Department, in conjunction with Human Resources, must be notified of the hazard immediately. If the hazard cannot be immediately abated, all employees and students will be removed from the affected area. Access to the area will be controlled until safety can be assured.

If continued use of the area must be maintained, the employees and/or students will be provided with the proper training, protective equipment, or other safeguards deemed necessary to protect them from the hazard.

The Facilities Department is available for consultation and assistance on matters involving hazard mitigation and for deciding what constitutes a “serious concealed danger.”

First Aid and Medical Assistance

Employees needing first aid for minor accidents can access the First Aid Kits located in common areas throughout the buildings.

More serious accidents, injuries, or exposures must be reported to the employee's supervisor and Human Resources immediately. To obtain medical treatment, go to <https://www.travelers.com/claims/claim-services?medical> to identify a medical provider in the local area.

TRAINING PROGRAM

Effective dissemination of safety information lies at the very heart of a successful IIPP. All employees must be trained in general safe work practices within the first 60 days of employment. In addition, specific instructions with respect to hazards unique to each employee's job assignment will be provided.

A. General Safe Work Practices:

At a minimum, all employees will be trained in the following:

1. Fire safety, evacuation and emergency procedures
2. Earthquake preparedness
3. Hazard communication and awareness (use of Safety Data Sheets)
4. Emergency Exits

B. Specific Safe Work Practices:

In addition to general training, each employee will be instructed how to protect themselves from hazards specific to their individual job duties. At a minimum, this entails how to use workplace

equipment. Training must be completed before beginning work on assigned equipment and whenever new hazards or changes in procedures are implemented.

Supervisors are responsible for providing employees with the necessary training to familiarize themselves with the safety and health hazards their employees are exposed to.

It is the responsibility of each supervisor to know the hazards related to their employee's job tasks, and ensure they receive appropriate training.

1. Supervisors will ensure that all employees receive general and job specific training prior to initial or new job assignments.
2. Supervisors will ensure that employees are trained whenever new substances, processes, procedures or equipment are introduced to the workplace that may create new hazards. Training must also be given when new or previously unrecognized hazards are brought to a supervisor's attention.
3. All training will be conducted and kept in department files. The attached Employee Training Checklist form (or equivalent) can be used for this purpose.

SAFETY COMMITTEE

USAHS operates a Safety Committee to assist in fulfilling its safety and health obligations under the law. The Safety Committee is concerned with physical and chemical hazards in buildings, processes and tasks.

The Safety Committee performs the following:

- Is served by adequate representation of all business operations, functional departments and University campuses
- Conducts quarterly meetings; potential ad hoc meetings and trainings as needed
- Performs periodic inspections of their respective work areas
- Provides a written agenda for each meeting including:
 - Previous minutes
 - Review of alleged hazards brought to the attention of the Committee
 - Investigative actions
 - Review of employee safety suggestions
 - Review of any OSHA citations and correction actions
 - Discussion and actions
- Provides adequate notice of meetings
- Records meeting minutes and distributes them to all Committee members
- Maintains files for the Committee's documentation

RECORDKEEPING

Many standards and regulations of OSHA contain requirements for the maintenance and retention of records for occupational injuries and illnesses, medical surveillance, exposure

monitoring, inspections, and other activities relevant to occupational health and safety. To comply with these regulations, as well as to demonstrate that the critical elements of this IIPP are being implemented, the following records will be kept on file in the department for at least the length of time indicated below:

1. Employee safety training records, at least 3 years
2. Inspection report, at least 1 year
3. Medical surveillance and exposure monitoring, indefinitely
4. Incident reports with a requirement of at least 30 years

The Facilities department will ensure that these records are kept in their files and will present them to OSHA or other regulatory agency representatives, if requested. Review of these records will be conducted by the Facilities Department during routine inspections to measure compliance with the Program. Human Resources will retain employee workers' compensation claim files.

COVID-19 PRECAUTIONS AND CONTROLS

On March 11, 2020 the World Health Organization declared the novel coronavirus (COVID-19) outbreak a global pandemic. USAHS is committed to providing a safe and healthy work environment for all employees and has implemented the following pandemic and infection control measures to control and mitigate the spread of COVID-19 and other communicable diseases.

Handwashing & Disinfection

The following disinfection practices are being conducted on-site:

- Posted signage on the importance of handwashing, and instructional handwashing signs;
- Increased cleaning schedule performed by the site's janitorial services on common touch points such as breakroom surfaces, door handles and crash bars, and handrails

Physical Distancing

The following physical distancing measures have been implemented on-site:

- Employees are permitted to work from home when authorized;
- In-person meeting have been canceled wherever feasible, video or telephonic meetings are being used in lieu;
- Physical distancing of at least 6 feet between persons at the workplace is being encouraged

Face Masks and Face Covering

Wearing a face mask is mandatory while onsite when in academic spaces.

Health & Temperature Screenings

USAHS has implemented a Health screening protocol for all personnel, contractors and visitors arriving on-site.

In addition to the above measures, COVID-19 related trainings will be assigned to employees (staff and faculty) and students.