



SONOMA STATE UNIVERSITY

Injury and Illness Prevention Program

Environmental Health & Safety
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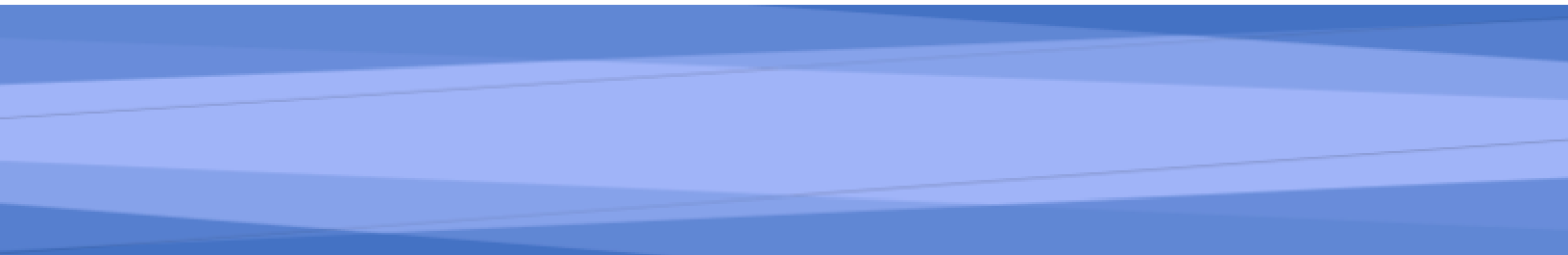


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Record Of Revisions

Version	By	Date	Description of Revision
1.1	KN	2/9/2023	Additions to include COVID-19
1.2	MB	9/14/2023	Annual review and formatting
1.3	AR	4/2025	Annual review, removal of COVID-19 provisions, addition of Codes of Safe Practices, addition of additional EHS safety programs, revision of investigations section

Legend:

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Introduction and Overview

Sonoma State University (SSU) makes every effort to maintain a healthy and safe work environment for faculty, staff, students, and visiting contractors. The University is committed to complying with health and safety standards set forth by local, State, and Federal agencies. To meet these goals, SSU has developed and implemented several health and safety programs. 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 (IIPP) is required by the California Division of Occupational Safety and Health Administration, (Cal/OSHA). 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 a procedure for injury/illness investigation;
- Mitigating hazards in the workplace;
- Training employees; and
- Maintaining records.

This comprehensive Injury Illness and Prevention Program has been prepared by the Department of Environmental Health & Safety (EHS) at Sonoma State University. The IIPP has been created to address the specific regulatory requirements outlined above, as well as, the incorporation of best management practices. The IIPP can be modified by EHS at any time, to revise or incorporate new health and safety programs/procedures, including those required by future legislation.

The IIPP applies to all employees and volunteers of the university, except for employees of the University Police Department. Those employees will follow the IIPP developed for the police department as referenced in the approved policy manual. All mention of "employees" in this plan is referenced accordingly.

Regulatory Authority

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

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 (in accordance with applicable CBA).

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 Sonoma State University. 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.

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 mitigate the 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 that employees should follow in case of emergency.

Compliance

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.

For additional information on the policies, procedures, and programs outlined in the IIPP, please contact the Department of Environmental Health and Safety (EHS) at (707) 664-2100 or visit EHS on the web at www.ehs.sonoma.edu

Responsibilities

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 EHS program are established under the final authority of the President.

Department of Environmental Health and Safety (EHS)

It is the responsibility of EHS, 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.

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:

- Where applicable, develop and maintain written departmental procedures and ensure that each manager/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 retain a copy of training records. Consult Environmental Health & Safety on final disposition and retention of records;
- Develop and maintain an inventory of hazardous materials present in all work areas within the department;
- Request a Safety Data Sheet (SDS), and abide by the chemical procurement 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.

Supervisors and Principal Investigators

- Develop 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.

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 or campus notices;
- 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.

NOTE: Student employees are employees.

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.

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 EHS. Additional methods for communicating matters relating to health and safety, which include:

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.

The frequency and structure of these meetings will be determined by the Departments. **All departments will conduct a minimum of one meeting per year in which safety is a topic.** Departments with increased safety concerns or hazard potentials should meet more frequently. These meetings should have an agenda or similar documentation of topics discussed and a roster of who attended. These records should be kept for three (3) years.

Employee Safety Training

The University provides general training programs for employees on an ongoing basis. Employees should contact their department supervisor, Human Resources, or EHS for information on specific safety training programs. Both entities provide specific training programs for employees either on a periodic basis, prior to job assignment, or when work assignments change.

Tobacco and Vape Free Environment

On September 1, 2017, the CSU System became smoke, tobacco, and vape free with the implementation of EO-1108. For more information and to read EO-1108, please visit the Chancellor's Office [website](#). Sonoma State University is committed to providing the healthiest and safest workplace possible.

For your health, we encourage you to consider smoking cessation. Please call 1-800- NOBUTTS for free assistance and information on how to stop smoking, or visit www.smokefree.gov and www.cancer.org for the American Cancer Society for related information.

Safety Inspections

A 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.

Additional inspections from regulatory authorities, including Cal-OSHA or the State Fire Marshal, are not described nor governed by this section.

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 department self inspections is left up to the departments' discretion. However, EHS recommends that all areas be inspected at least 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, 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 on the EHS website at www.ehs.sonoma.edu. If you would like assistance in developing a specific inspection program for your area, contact the Department of Environmental Health & Safety.

Unscheduled Workplace Inspections

Departments and/or EHS will conduct periodic unscheduled inspections of 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 EHS 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 EHS will make recommendations or issue requests for corrective actions to be taken that will address the deficiencies documented during such inspections.

Reporting of Work-related Injuries and Illnesses

All injuries on the job must be reported. However, different requirements exist for reporting “minor” vs. “serious” injuries.

- Minor injuries incurred on the job will be reported to the immediate supervisor of the injured employee who will make the report to Human Resources within 24 hours;
- 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, who must, in turn, notified Human Resources as soon as possible.
- Illnesses include any state or federal public health emergency as defined by the County of Sonoma Department of Public Health.

There are short, strict timelines within which Human Resources must report specified serious injuries to Cal/OSHA. Notify HR immediately in the event of a serious injury by following the [instructions from their website](#).

Environmental Health and Safety may investigate the circumstances of the injury and document the findings. See [Incident Investigation](#) for more information.

Incident Investigation

EHS will lead investigations into employee injuries, near miss incidents or accidents that cause property damage or injury to determine the cause and identify potential mitigation measures to avoid similar future incidents. EHS may receive reports of incidents that warrant investigation through any of the following means:

- Employee injuries or illnesses are reported to Human Resources, who will share reports with EH&S
- Near miss incidents should be reported to EHS by employees or supervisors who witness, are affected, or are otherwise knowledgeable about a near miss incident¹
- Accidents must be reported to EHS by employees or supervisors who witness, are affected or otherwise knowledgeable about an accident, whether or not property damage or injuries result. Accidents include vehicle accidents.²

Incident investigations by EHS are not intended to identify a person at fault, rather determine the root cause and implement improvements to systems to reduce the risk of future occurrences. Persons involved in the incident, however, will be notified of their right to representation during incident investigations as statements and facts gathered during the review could lead to or be used in subsequent investigations into employee actions or conduct.

EHS will share findings with involved departments and make recommendations to reduce the risk of future occurrences. Findings and recommendations may include, but are not limited to:

Findings		Recommendation
Regulatory violations or deficiencies	➤	Plan improvements, retraining, changes in procedures/planning
Failure to follow policies/procedures	➤	Retraining, supervisory improvements
Lack of training or failure to follow training	➤	Retraining, supervisory improvements
Previously unidentified hazards	➤	Implement hazard controls
Lack of job planning, lack of process	➤	Development of job hazard analysis, codes of safe practices, or formal standard operating procedures (SOPs)
Persons working outside of designated responsibilities/training	➤	Correction to assignments, supervisory improvements

¹ A near miss incident is an unplanned event that did not result in injury, illness, or damage—but had the potential to do so and usually signals a hazard is present.

² An accident is an unplanned, undesired event that results in injury, illness, property damage, or environmental harm.

Hazard Controls

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 EHS 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 Risk Assessment Matrix. Prioritization of abatement actions will be based on the ranking scheme;
- Serious violations and hazards will always be given top priority and will be corrected immediately.

Risk and Hazard Assessment

The table below represents a typical matrix for the evaluation of risks and threats. The matrix uses a balance of the relative likelihood of an event occurring and the impact that such an event would have on the ability of the university to operate without significant disruption. When faced with the evaluation of a potential risk and the types of mitigation that might be appropriate, risk assessments will be conducted and evaluated against the risk appetite of the university and available mitigations or controls to reduce the risk.

ENVIRONMENTAL HEALTH & SAFETY RISK ASSESSMENT MATRIX

		<i>Severity of Consequence</i>				
		SEVERITY	CATASTROPHIC	CRITICAL	MINOR	NEGLIGABLE
CONSEQUENCES		People	Likely to result in death(s)	Severe injury/disability	Minor injury	Slight injury
		Environment	Massive impact	Major impact	Moderate impact	Slight impact
		Asset	Extensive damage	Major damage	Local damage	Slight damage
<i>Likelihood of Occurrence or Exposure</i>	Frequent	Likely to occur repeatedly	HIGH	HIGH	SERIOUS	MEDIUM
	Probable	Likely to occur several times	HIGH	HIGH	SERIOUS	MEDIUM
	Occasional	Likely to occur sometime	HIGH	SERIOUS	MEDIUM	LOW
	Remote	Not likely to occur	SERIOUS	MEDIUM	MEDIUM	LOW
	Improbable	Very unlikely - may assume exposure will not occur	MEDIUM	LOW	LOW	LOW

HIGH	Operation not permissible
SERIOUS	High priority requires immediate risk mitigation
MEDIUM	Take remedial action at appropriate time
LOW	Risk acceptable; remedial action discretionary

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, Sonoma State University Police, Facilities Management Services, and EHS);
- The Department Head or EHS will inform employees of any imminent hazard(s) that cannot be immediately corrected.

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 workplace.

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 (SSU Learn or other resources).

Codes of Safe Practices

Environmental Health and Safety will develop Codes of Safe Practices for each operational setting on campus to include:

- General office
- Facilities Shops/Operations
- Culinary
- Laboratory
- Art Shops
- Recreation/Athletic
- Childcare

Department-specific Training

It is the responsibility of each supervisor to understand his/her employee's job risks and related hazards. Environmental Health and Safety is available to assist supervisors in determining these hazards and applicable training requirements, as well as recommend personal protective equipment upon request

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.

- All such training will be documented with the task/topic, date trained, date competency was demonstrated (when applicable) and is countersigned by both the supervisor/trainer and the employee

Safety and Regulatory Programs

Environmental Health and Safety is responsible for coordinating and maintaining generalized safety training programs as elements of the IIPP. These programs serve campuswide operations and often fulfill regulatory requirements. These programs include, but are not limited to:

- Asbestos and Lead
- AED and First Aid
- Biological Safety (laboratory)
- Bloodborne Pathogens
- Chemical Hygiene
- Confined Space
- Electrical Safety
- Eyewash and Safety Shower
- Fall Protection
- Fire Safety
- Hazard Communication
- Hearing Conservation
- Heat Illness
- Hot Work
- Laboratory Safety
- Mold Management
- Office and Workspace Safety
- Personal Protective Equipment
- Powered Cart Safety
- Respiratory Protection
- Wildfire Smoke
- Workplace Violence Prevention*

** Note: The University's Workplace Violence Prevention Plan is maintained by Risk Management with support from EH&S*

In addition to comprehensive programs, EHS will develop summary resources designed to promote awareness and encourage safe behaviors. These "Safety Briefs" flyers will provide guidance, instructions, and resources for specific hazards or tasks within a work area.

All safety training will be documented in writing by the department or EHS depending on who provided the training. Safety training topics, participants, and dates will all be recorded and kept on file within each department and at EHS.

Recordkeeping and Records Access

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.

Occupational Injuries and Illnesses

Records of occupational injuries and illnesses will be kept on file with Human Resources and will be made available for review by Cal/OSHA at any time, for a period of five (5) years. These records include:

- Supervisor's report of injury forms
- DWC-1 forms
- Correspondence with employees, supervisors, or medical providers regarding work related injuries or illnesses
- OSHA form 300
- OSHA form 300A

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.

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.

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

Safety Data Sheets (SDS)

Each SDS 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.

Incident Investigations

Records associated with an incident investigation, including employee injuries and illnesses, near miss incidents, and accidents (including traffic accidents) will be maintained by EHS for 5 years.

Workplace Violence related investigation record retention is outlined in the Workplace Violence Prevention Plan.

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;
- Record retention for inspections and assessments associated with the Workplace Violence Prevention Plan can be found in that plan.
- 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 EHS, as appropriate.

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 EHS office.