

Environmental Health and Safety

California incident and injury prevention plan

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Mission

Our mission at the ASU California Center is to provide innovative programs and services that foster a safety culture and environmental responsibility for the Arizona State University community. We aim to assist individuals and departments in achieving compliance with all health and safety standards by establishing safe work practices through education, training and the hazard review process. This mission is crucial in creating a safe and healthy work environment for every university community member. Additionally, we liaise with external regulatory agencies and monitor university compliance with mandatory health and safety regulations.

Purpose

At ASU, our commitment to the safety and health of our employees is paramount. We understand that our company's strength is directly linked to the well-being of each individual. We will always prioritize safety and health above all else and actively involve all workers at every level in establishing, implementing, and evaluating our efforts. This written Injury and Illness Prevention Program is a testament to our dedication, intended to reduce the severity of job-related illnesses and injuries. It is our firm intent to comply with the requirements of California laws and Section 3203 of the General Industry Safety Orders.

Scope

The Incident and Injury Prevention Program is designed to apply to all departments within the State of California. Its primary goal is significantly reducing the severity of job-related illnesses and injuries, ensuring a safer work environment.

Roles and responsibilities

Director of Facilities:

Responsible for building facilities, such as ventilation, custodial services, security, etc.

Director of operations for university business services:

Responsible for business services, such as scheduling, café operations, logistics, etc.

Environmental Health and Safety (EHS)

ASU EHS is responsible for developing, maintaining, and implementing occupational health and safety programs, including but not limited to:

Supervisors provide training tools and maintain training records.

- Investigating and documenting all incidents that result in an employee injury or damage to property.
- Periodically audit compliance with this program and notify affected parties of any findings or opportunities for improvement related to this program.

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- Provide safety training to ASU employees.
- Reviewing injury and illness trends.

Employee Health

The ASU medical surveillance program, managed by ASU EH with support from ASU EHS, evaluates and monitors the health of University faculty and staff who are exposed to certain hazardous materials and situations as defined by law or University programs. Each supervisor must ensure that employees under their supervision participate in the medical surveillance program.

 Acting as university representative with regulatory agencies for environmental health and occupational safety matters.

Supervisors

ASU supervisors are responsible for:

- Documenting and reporting any employee injuries or illnesses to EHS promptly.
- Documenting and reporting any potential safety hazards or concerns to EHS and CBRE.
- Ensuring that all employees are following safe work practices and procedures.
- Ensuring all employees have completed the <u>required training</u> before beginning work and retraining as required.
- Providing employees with the proper tools and adequate personal protective equipment to complete jobs safely.
- Working with EHS to complete job hazard assessments as necessary.

Employees

ASU employees are responsible for:

- Adhering to all safety and health practices and procedures, including using required PPE.
- Completing initial or refresher training as required.
- Immediately report any incidents that result in injuries or illnesses during work to their supervisor.
- Reporting any near misses or unsafe work hazards to their supervisor and completing an <u>online</u> <u>incident report</u>.

Safety communication

Required safety communication will be distributed through the appropriate departments. Communications will include meetings, ASU email, LiveSafe app, Slack, posters, ASU Insight or PowerPoint presentations.

Access written safety and health programs.

Employee participation and information

All employees are required to follow all ASU health and safety policies and procedures. Personnel found repeatedly violating safety and health policies or procedures will be subject to disciplinary action as stated in the ASU Disciplinary policy (SPP 809).

Safety and health reporting

In accordance with Cal/OSHA and DOL regulations, ASU has safety and health reporting guidelines in place to ensure a timely response to potential safety concerns.

If an employee experiences an incident that results in an injury or illness, they are to report the incident to their supervisor as soon as reasonably possible. If it is determined that the employee requires medical treatment, they are encouraged to seek care at a local emergency room, urgent care provider or other applicable medical facility.

To meet mandated reporting times, supervisors must report any illness or injuries to Employee Health as soon as possible. Reports can be completed <u>via the online form</u> or over the phone to Employee Health at (602)496-1917; Employee Health is available Monday through Friday, 7:00 a.m. to 4:00 p.m. (MST). Employee Health will ensure proper notifications are made within the required time.

Accident or exposure investigations

When an incident report is submitted to Employee Health, either EHS or Employee Health member may contact the supervisor or employee for further information. Information will be compiled into a report with suggested corrective actions to prevent a similar incident from reoccurring. EHS will verify that any recommended corrective actions have been completed.

Incident reports will be discussed at the biweekly EHS DC/California Center meeting for further review and comment.

Hazard identification and assessment

Employees must notify their supervisor immediately if a potential hazard is found. Supervisors, please report any potential hazards to EHS. Depending on the hazard, EHS will either investigate and determine what steps must be taken to remediate the situation or send the information to the relevant parties. EHS may request that the hazardous condition be tagged out, removed from service or any other acceptable method of warning employees of the hazard until the condition can be appropriately remediated.

When reporting hazards, please include all relevant information and photo documentation of the hazard.

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Hazard prevention and control

Multiple hazard prevention and control methods have been deployed throughout ASU to reduce the danger posed by hazards and risks.

Hazards that can be easily eliminated will be eliminated when possible. In cases where elimination is impossible, renovations or other potential engineering methods will be determined if they would be feasible. Personal protective equipment or other administrative controls will be implemented when necessary.

Employees will be provided with the necessary PPE and undergo any necessary medical screenings and training before performing any task that requires PPE. PPE is not optional and must be worn by the employee. Concerns related to the condition, size or fit of PPE should be reported to a supervisor.

Training

ASU employees must complete all relevant training before conducting any work. Supervisors will provide employees with a list of required training and will also be responsible for ensuring they have completed it.

Specific programs require refresher training. Training that is not conducted on a scheduled basis may be required to be retaken if the employee's job has changed, the task process has been altered significantly, an employee was observed to have a deficiency in their knowledge of the topic or if there has been an injury or illness related to the task.

Safety and health recordkeeping

All records and documents required under Cal/OSHA or Federal OSHA to be retained will be done so for the required length of time.

Employees can request copies of their health records by calling or emailing Employee Health.

EHS will assist employees and supervisors with accessing training records.

Program evaluation

EHS will evaluate this program as necessary to maintain compliance with state and federal regulations.

Appendix A: COVID-19 prevention plan

Valid through February 3rd, 2025 (Cal/OSHA)

Authority and responsibility

The director of operations for University Business Services has overall authority and responsibility for implementing the provisions of this COVID-19 Prevention Plan - in the workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using current CDC-recommended safe work practices, following all ASU, CDC, State of California and local directives, policies and procedures and assisting in maintaining a safe work environment.

COVID-19 health hazards and prevention

ASU has implemented the following at the ASU California Center locations:

- Applicable orders, general and industry-specific guidance from the State of California, Cal/ OSHA, will be used to guide and recommend.
- ASU requires employees to promptly notify their supervisor and <u>ASU Employee Health</u> if they test
 positive for COVID-19, are experiencing COVID-19 symptoms or have been diagnosed with
 COVID-19.
- Employees who develop symptoms while at work must communicate with their supervisor and be sent home until they are cleared to return to work.
- Employees will email, telephone or use other electronic means of communicating with their supervisor if they are ill and will not be on campus.
- Existing COVID-19 prevention controls in the workplace will be implemented and the need for different or additional controls will be evaluated as needed and required.
- Following self-isolation, quarantine and return-to-work instructions can be found on the following link: LADPH COVID-19 Guidelines.
- Workplace-specific evaluations have been and can be conducted using the Appendix B: Identification of COVID-19 Hazards form.

COVID-19 training

ASU provides effective employee training and instruction that includes:

• COVID-19 or other infectious disease policies and procedures to protect employees from hazards and how to participate in identifying and evaluating hazards.

- Employees have the right to request a respirator for voluntary use, without fear of retaliation, and our policies for providing the respirators. Employees may request N95 respirators for voluntary use through the <u>ASU Employee Health web site website</u>, which includes training according to section 5144(c)(2) requirements:
 - Guidance regarding masks at the workplace, if required by health orders or regulations by Cal/OSHA, CDPH, LADPH and local municipalities.
 - How to perform a seal check per the manufacturer's instructions each time a respirator is worn and facial hair can interfere with a seal.
 - How to properly wear respirators.
 - The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or handwashing facility and that hand sanitizer does not work if the hands are soiled.

Testing of employees

- ASU provides employees with access to COVID testing at no cost during employees' paid time.
- ASU provides testing when necessary by Cal/OSHA, CPDH and LADPH.
- Employees can request accommodations through ASU's Office of Diversity, Equity and Inclusion at 480-727-1770.

Investigating and responding to COVID-19 cases

ASU has developed effective procedures to investigate COVID-19 cases, including seeking information from employees regarding COVID-19 cases, close contacts, test results and the onset of symptoms. Once reported, ASU Employee Health collects the necessary information.

Employees must communicate with their supervisors and ASU Employee Health if they cannot work due to illness or exposure to COVID-19.

If you are sick:

- 1. If you test positive or have symptoms, we ask that you follow the <u>LADPH COVID-19 Guidelines</u>. and avoid contact with others, except to get medical care.
- 2. Students can contact ASU Health Services (480-965-3349 or eoss.asu.edu/health), who will advise you about scheduling a telehealth or in-person appointment; students should also contact their professors.
- 3. Employees should contact their supervisor to inquire about workplace accommodations.
- 4. When ASU is notified that a person who has been in the workplace (including employees, clients, patients, residents, vendors, contractors, customers, delivery people and other visitors or other non-employees) is COVID-19 positive, ASU in collaboration with ASU Employee Health will notify LADPH per current reporting guidelines.

5. ASU Employee Health will report a potential outbreak immediately to the LADPH if the number of COVID cases meets the LADPH's current reporting requirements. This reporting will occur within 14 days. Reporting can be completed online at https://spot.cdph.ca.gov/s/?language=en US.

Notifications will **not** include the name, contact information or occupation of the COVID-19-positive person.

ASU will inform each employee that employees have a right to protection and that employers are prohibited from discharging or discriminating against any employee for exercising their right to protection or for engaging in actions required by Cal OSHA's ETS. ASU follows <u>ACD 401</u>: Prohibition Against Discrimination, Harassment, and Retaliation and Arizona Board of Regents Policy Number 1–119: Nondiscrimination and Anti-Harassment.

Appendix B: Identification of COVID-19 hazard and documentation

Person conducting the evaluation:

Regardless of symptoms or negative COVID-19 test results, all persons will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees perform an assigned task. For example, meetings, training, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas and waiting areas.

Potential workplace exposure will be evaluated for all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. ASU will consider how employees and other persons enter, leave and travel through the workplace and address stationary work.

Date: Name(s) of employee and authorized employee representative that participated:					

Date: ______ Name of person conducting the inspection: _____

Appendix C: COVID-19 inspections and documentation – template

Work location evaluated: _____

Exposure Controls	Status	Person assigned to correct	Date corrected
Engineering			
Ventilation* (amount of			
fresh air and filtration			
maximized)			
Additional room air			
filtration*			
Administrative			
Surface cleaning and			
disinfection (frequently			
enough and adequate			
supplies)			
Hand washing facilities			
(adequate numbers and			
supplies)			
Disinfecting and hand sanitizing solutions being			
used according to			
manufacturers			
instructions.			
Alternative work			
schedules and occupancy			
controls during increased			
community spread.			
DDE (not oborod			
PPE (not shared, available and being worn)			
Face coverings (cleaned			
sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			

*Identify and evaluate how to maximize ventilation with outdoor air, the highest level of filtration efficiency compatible with the existing ventilation system and whether using portable or mounted HEPA filtration units or other air cleaning systems would reduce the risk of COVID-19 transmission. Review applicable orders and guidance from the State of California and local health departments related to COVID-19 hazards and prevention have been reviewed, including the CDPH Interim Guidance for ventilation, filtrations, and air quality in Indoor environments and information specific to your industry, location and operations. We maximize the quantity of outside air provided to the extent feasible, except when the United States Environmental Protection Agency, or EPA, Air Quality Index is greater than 100 for any pollutant or if opening windows or maximizing outdoor air by other means would cause a hazard to employees, for instance from excessive heat or cold.

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Appendix D: Investigating COVID-19 cases

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All personal identifying information of COVID-19 cases or persons with COVID-19 symptoms and any employee-required medical records will be kept confidential unless disclosure is required or permitted by law. Un-redacted information on COVID-19 cases will be provided to the local health department, LADPH, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health, or NIOSH, immediately upon request and when required by law.

Date.
Name of person conducting the investigation:
Name of COVID-19 case (employee or non-employee*) and contact information:
Job Title (if non-employee*, why they were in the workplace):
*If we are made aware of a non-employee COVID-19 case in our workplace.
Names of employees/representatives involved in the investigation:
Date investigation was initiated:
Locations where the COVID-19 case was present in the workplace during the high-risk exposure period and activities being performed:
Date and time the COVID-19 case was last present and excluded from the workplace:
Date of the positive or negative test and/or diagnosis:
Date the case first had one or more COVID-19 symptoms, if any:
Information received regarding COVID-19 test results and onset of symptoms (attach documentation):

Summary determination of who may have had close contact with the COVID-19 case during the high-risk exposure period. Attach additional information, including:

- 1. The names of those found to be in close contact.
- 2. Their vaccination dates.
- 3. The names of those excluded per our Exclusion of COVID-19 Cases and employees with a close contact requirement.
- 4. The names of those exempt from exclusion requirements for either reason:
 - a. For those that never developed symptoms, for 90 days after the initial positive test.
 - The individual returned to work per ASU's return-to-work criteria and has remained symptom-free for 90 days.

Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:

1. All employees who were in close contact.

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Names of employees that were notified:	Names of their authorized representatives:	Date:

2. Their authorized representatives (if applicable, the notice they required by Labor Code section 6409.6(a)

Independent contractors and other employers present at the workplace during the high-risk exposure period.

Date:

and (c)).