

**OCCUPATIONAL HEALTH**  
**CALIFORNIA STATE UNIVERSITY,**  
**SACRAMENTO**

**Report Number 97-16**  
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## ABBREVIATIONS

CCR	California Code of Regulations
CSUS	California State University Sacramento
DSC	Department Safety Coordinators
EH&S	Environmental Health and Safety
EMMP	Employee Medical Monitoring Program
GISO	General Industrial Safety Orders
IIPP	Injury and Illness Prevention Program
MSDS	Material Safety Data Sheets

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## INTRODUCTION

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### PURPOSE

Our overall audit objective was to determine the effectiveness of existing policies and procedures that relate to both employee and student health and safety and mitigation of real and potential hazards in the workplace.

Within the overall audit objective, specific goals included determining whether:

- ▶ the campus had developed and distributed a written IIPP to all departments;
- ▶ the campus had developed a satisfactory system for communicating pertinent IIPP and other safety and health information to all affected employees;
- ▶ selected departments had implemented procedures for both scheduled and unscheduled inspections which includes the filing of reports with distribution to appropriate department chairs and the office on environmental health and safety;
- ▶ the campus had implemented procedures for investigation, recording and reporting accidents;
- ▶ the campus had identified training requirements applicable to specific classes of employees and provided adequate training to students whose study areas take them into places where potential workplace hazards are located;
- ▶ the campus had developed procedures and materials to assure that employees and students are provided training in a timely manner;
- ▶ the campus had developed procedures for recording training to employees and students; and
- ▶ the campus has developed a medical monitoring program and identified those employees who should be included.

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### SCOPE AND METHODOLOGY

This review emphasized but was not limited to compliance with state laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters and directives. The primary directive for this review involves Title 8, §3203. *Injury and Illness Prevention Program (IIPP) of the California Code of Regulations (CCR)*. In addition, Office of the Chancellor and campus generated manuals were used to measure compliance with selected health and safety issues. January 1996 to date was the primary period of review.

Our focus involved appropriate health and safety related records and procedures within the campus Environmental Health and Safety Office and four departments: Art, Biology, Chemistry and Physical Plant. We selected ten employees from each of the four departments and two spring 1997 classes from each of the three academic departments. We reviewed available records related to health and safety training and information for both the selected employees and students within the selected classes.

Specifically, we reviewed and tested the following areas:

- ▶ development, implementation and communication of the campus IIPP;
- ▶ health and safety inspections;
- ▶ employee health and safety training;
- ▶ student health and safety training;
- ▶ employee medical monitoring; and
- ▶ accident investigation and reporting.

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## BACKGROUND

The Board of Trustees Committee on Audit directed the office of the University Auditor to review the subject of Occupational Health at its January 1997 meeting. Occupational Health was selected because of several factors including the risk evaluations recently completed by CSU executives and endorsements for the audit by the Statewide Academic Senate and the California State Students Association.

Senate Bill 198: Injury and Illness Prevention Program (IIPP) was passed and chaptered into the Insurance and Labor Codes on October 2, 1989. Regulations amending the General Industrial Safety Orders (GISO) in the California Code of Regulations were adopted on December 13, 1990 and incorporated in GISO §3203, Injury and Illness Prevention Program. Beginning July 1, 1991, §3203 required employers to establish, implement, and maintain a written Injury and Illness Prevention Program with specified elements including substantial compliance criteria for use in evaluating an employer's injury prevention program.

The California State University developed and distributed a model Injury and Illness Prevention Program (IIPP) to each campus. This model (IIPP) was designed to serve as an umbrella that incorporates the elements of the myriad of individual health and safety programs required by state and federal law. It has also been designed to integrate existing campus health and safety regulations and future safety-related mandates that may arise.

The intent of the model IIPP was to: facilitate identification and evaluation of workplace hazards; correction of unsafe conditions; communications between the university and its employees, students and the general public on matters concerning health and safety; education and training of employee; development of compliance strategies; documentation/recordkeeping of safety and health related activities; and identification of the person responsible for administering the program.

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## **OPINION**

We visited the California State University, Sacramento campus between July 14 and August 22, 1997 and audited the procedures in effect at that time.

We found that, except for the items noted in the Executive Summary and in the details of the report, compliance with state, CSU and campus policies and procedures were satisfactory. The comments that follow are based on an effort to identify and mitigate issues that detract from the overall effectiveness of the existing campus health and safety program.

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## **EXECUTIVE SUMMARY**

The purpose of this section is to provide management with an overview of conditions requiring their attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [ ] refer to page numbers in the report.

### **HEALTH AND SAFETY INSPECTIONS [5]**

The campus health and safety inspection process was in need of improvement in the following areas: timeliness of inspections, distribution of inspection reports, and documentation on follow-up activities to correct previously identified deficiencies. Establishing full implementation of existing campus inspection policies and procedures reduces campus exposure to injuries and illnesses, subsequent civil and criminal litigation, and citations/fines by various regulatory agencies.

### **EMPLOYEE HEALTH AND SAFETY TRAINING [6]**

The campus employee health and safety training procedures were deficient with respect to: development of training requirements, timely training of employees, and maintenance of training records. Establishing full implementation of training policies and procedures reduces campus exposure to injuries and illnesses, subsequent civil and criminal litigation, and citations/fines by various regulatory agencies.

## **STUDENT HEALTH AND SAFETY TRAINING [7]**

On- and off-campus health and safety training and information policies and procedures for students were inadequately documented. Establishing a more comprehensive and uniform process of providing students with applicable training and information regarding both on- and off-campus educational activities reduces the risk of both injuries and illnesses to students and subsequent civil litigation.

## **EMPLOYEE MEDICAL MONITORING [8]**

The campus had neither identified all employees who should be included in their Employee Medical Monitoring Program (EMMP) nor provided timely medical monitoring to a number of those currently in the EMMP. Identifying those employees who should be included in the EMMP and assuring they receive appropriate and timely medical monitoring reduces the risk of work related illnesses going undetected.

## **ACCIDENT INVESTIGATION AND REPORTING [10]**

The campus accident investigation and reporting procedures were deficient. Establishing full implementation of accident investigation and reporting reduces the risk of additional injuries and illnesses and subsequent civil litigation.

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## OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

### HEALTH AND SAFETY INSPECTIONS

The campus health and safety inspection process was in need of improvement in the following areas: timeliness of inspections; distribution of inspection reports; and, documentation on follow-up activities to correct previously identified deficiencies.

We found that:

- ▶ Formal inspections in the three academic areas were not being completed within the intervals recommended by the campus IIPP, which included semi-annually by department safety coordinators and annually by EH&S.
- ▶ Formal inspections within facilities management were not properly documented. The campus did not provide us with documentation during the audit evidencing all inspections occurring during CY 1996 and 1997.
- ▶ There was no record of any departmental inspection results being provided to the campus EH&S committee.
- ▶ Monthly inspections of eyewashes and safety showers were not being completed. The EH&S staff indicated they perform these inspections on an annual basis.
- ▶ The process for follow-up of inspection deficiencies was limited to the department being responsible for taking corrective action on reportable items in the inspection reports. The record indicating any such corrective action by departments was not sufficiently documented.

The CSU Model Injury and Illness Prevention Program (IIPP) among others, addresses the inspection requirements contained in California Code of Regulations (CCR) title 8, §3203, Injury and Illness Prevention Program. The campus version of the IIPP titled *Injury Illness Prevention Program* addresses specific inspection requirements in §10, Health and Safety Inspections and §12, Hazard Control Procedures.

The EH&S director and the safety officer for the Arts and Sciences area indicated that the above weaknesses primarily involved a lack of resources to either monitor or carry out existing campus health and safety inspection policies.

By not assuring full implementation of inspection procedures, the campus is exposed to an increased risk of injuries and illnesses, subsequent civil and criminal litigation and citations/fines by various regulatory agencies.

#### **Recommendation 1**

We recommend that the campus review and strengthen their existing health and safety inspection procedures related to timeliness of inspections, inspection report distribution and follow-up activities to correct previously identified deficiencies.

### **Campus Response**

We will insure that both department and E&HS inspection processes are performed within the intervals defined by our IIPP. We also will insure the distribution of inspection reports is properly documented. Finally, we will strengthen our process to insure deficiencies are corrected and so documented. We believe we can complete these actions by the end of the academic year.

## **EMPLOYEE HEALTH AND SAFETY TRAINING**

The campus employee health and safety training procedures were deficient with respect to: development of training requirements, timely training of employees, and maintenance of training records.

We found that:

Specific training requirements, including frequency of refresher training had not been developed for each employee.

Not all employees were receiving required health and safety training. Training records indicated that faculty were receiving less training than staff employees.

- ▶ There was no advance schedule of employees who were to attend training provided by EH&S.
- ▶ Procedures were not in place to assure that each employee who missed regularly scheduled training sessions was identified and rescheduled for training at a later date.
- ▶ Health and safety training for new staff employees was conducted by human resources rather than EH&S. Receipt of a health and safety booklet was the extent of the training provided.
- ▶ There was no documented evidence that new employees received general and specific safety training prior to assignment to a new job.
- ▶ There was no documented evidence that employees received necessary training whenever new hazardous substances, processes, procedures or equipment were introduced to the workplace; or whenever a previously unrecognized hazard was discovered.

The CSU Model Injury and Illness Prevention Program (IIPP), among others, addresses the training requirements contained in California Code of Regulations (CCR) Title 8, §3203, Injury and Illness Prevention Program. The campus version of the IIPP titled *Injury Illness Prevention Program* addresses specific training requirements in §13, Employee Safety Training.

Both the EH&S Officer and the three department chairs interviewed indicated that the above weaknesses primarily involved a lack of resources to either monitor or carry out existing campus health and safety training policies.

By not assuring full implementation of training procedures, the campus is exposed to an increased risk of injuries and illnesses, subsequent civil and criminal litigation and citations/fines by various regulatory agencies.

### **Recommendation 2**

We recommend that the campus strengthen their existing health and safety training procedures to assure timely training of their employees.

### **Campus Response**

We will expand our existing database to include the training requirements and frequency of all classifications used at this campus. Additionally, we will insure that departments maintain records documenting that all employees have received the training appropriate for their classification. Finally, we will insure that E&HS adds a review of these records to their periodic inspections. We believe we can complete these actions by the end of the calendar year.

## **STUDENT HEALTH AND SAFETY TRAINING**

On- and off-campus health and safety training and information policies and procedures for students were inadequately documented.

We found that:

- ▶ The campus did not have a written policy for off-campus activities such as internships and field trips.
- ▶ Two of the three academic departments reviewed (Art and Chemistry) had not developed written student field trip or internship health and safety policies and procedures for off-campus educational related activities. In addition, these two departments were not able to provide evidence of any health and safety training and information that might have been provided to students participating in either field trips or internships.
- ▶ One of the three academic departments visited (Art) had not developed a complete student health

and safety policy for classroom or lab activities. In addition, the Art Department was not able to provide evidence of any health and safety training and information that might have been provided to the students in the two classes selected.

- ▶ MSDSs used for the Chemistry Department were not always readily accessible to students and other individuals working in the laboratories.

Because there is no comprehensive and uniform state, CSU, and campus policy regarding on-campus student health and safety training and information, we found that schools and departments were developing and implementing their own individual student health and safety related training and information, thus leading to varying degrees of coverage. There was no campus procedure to periodically review and update student health and safety off-campus activities.

By not establishing a more comprehensive and uniform process of providing students with applicable training and information regarding both on- and off-campus educational activities, there is an increased risk of both injuries and illnesses to students and subsequent civil litigation.

### **Recommendation 3**

We recommend that the campus establish and currently maintain a more comprehensive program that addresses liability issues related to both on- and off-campus student health and safety training and information.

### **Campus Response**

We will insure that departments conducting field trips develop, from our current training program, written policies addressing liabilities. We also will insure that departments document the safety training provided to students and insure the availability of safety materials. We believe we can complete these actions by the beginning of the new academic year.

## **EMPLOYEE MEDICAL MONITORING**

The campus had neither identified all employees who should be included in their Employee Medical Monitoring Program (EMMP) nor provided timely medical monitoring to a number of those currently in the EMMP.

We found that:

- ▶ The current list of employees requiring medical monitoring did not include any faculty, with the exception of one, even though they are exposed to the same academic work areas as the laboratory technicians who are included in the list.

- ▶ None of the public safety officers was receiving required periodic medical examinations. The only examination completed for this group was their initial examination prior to being hired. Public safety employees are not included on the list of other campus EMMP participants.

Specific employee medical monitoring program requirements are contained within the CSU Sample Employee Medical Monitoring Program (EMMP) Manual and the CSUS Employee Medical Monitoring Program. Both the CSU and campus EMMP documents require a baseline physical examination of applicable employees before being assigned to work with respirators or in areas containing potentially hazardous or OSHA regulated substances. Subsequent periodic examinations for these employees were required and the frequency depends upon that required by the physician or pertinent regulation.

Section 2.2 of the CSU EMMP Manual contains the following information regarding faculty.

. . . In general, faculty members have minimal contact with hazardous agents or chemicals, and minimal potential for exposure. Faculty members from the following departments may have potential for a significant biological, physical, or radiological exposure: Chemistry, Biological Sciences, Art, Industrial Arts, Chemical Engineering, Ornamental Horticulture and Plant and Soil Science.

Office of the Chancellor Memorandum HR 96-04, April 8, 1996, *Policy on Mandatory Medical Examinations - Personnel Actions for Failure to Employee to Comply* states in part:

It is the policy of the CSU that medical examinations mandated by federal and state laws and regulations are strictly enforced by each campus. Failure or refusal of an employee to undergo required medical testing as determined by campus management shall constitute a failure or refusal to perform the normal and reasonable duties of the position.

The director of EH&S stated that his efforts to include faculty members in the EMMP have only resulted in their participation on a voluntary basis. The director of EH&S also stated that the campus chief of public safety did not want his officers included in the general population of EMMP participants because he wanted to be able to control the confidentiality of their records and control the examination process when the program started.

By not identifying those employees who should be included in the EMMP and assuring they receive appropriate and timely medical monitoring, the risk of work-related illnesses going undetected are increased.

#### **Recommendation 4**

We recommend that the campus:

- a. provide training to department representatives regarding full implementation of the EMMP;
- b. identify and include all appropriate employees in the EMMP; and
- c. assure that all employees in the EMMP are provided appropriate and timely medical monitoring.

### **Campus Response**

We will insure that all appropriate employees are included in the EMMP. We also will insure that those included in the EMMP receive the appropriate medical monitoring. We believe we can complete these actions by the end of the fiscal year.

## **ACCIDENT INVESTIGATION AND REPORTING**

The campus accident investigation and reporting procedures were deficient. The areas where improvement was needed included: distribution of accident reports, timeliness of investigations, and campus EH&S committee oversight.

We found that:

Not all student accident reports were being routed to EH&S for review and investigation.

- ▶ Not all accidents occurring on campus were being reported to the Occupational Health & Safety committee.
- ▶ Only one (Biology) of the four departments reviewed maintained departmental injury logs.

The CSU Model Injury and Illness Prevention Program (IIPP) among others, addresses accident investigation and reporting requirements contained in California Code of Regulations (CCR) title 8, §3203, Injury and Illness Prevention Program. The campus version of the IIPP titled *Injury Illness Prevention Program* addresses specific accident investigation requirements in §11, Accident Investigation and §14.1, Campus Accidents, Injuries and Illness Recordkeeping Procedures.

The EH&S director indicated that the accident reports were completed by other departments who were unaware of the IIPP requirement to provide copies to his office for accident investigation. He further stated that his office currently did not have the resources to maintain and investigate all accidents occurring on campus.

Failure to establish full implementation of campus IIPP accident investigation and reporting procedures, including remedial corrective actions, increases the risk of additional injuries occurring and subsequent civil litigation.

### **Recommendation 5**

We recommend that the campus strengthen their existing accident investigation and reporting procedures to assure:

- a. timely reporting of accidents to both EH&S and the campus-wide EH&S committee;
- b. timely investigation of accidents by EH&S; and
- c. more complete departmental injury recordkeeping.

### **Campus Response**

We will ensure that all accident reports are forwarded to E&HS for review. We also will insure those reports requiring E&HS Committee review are forwarded to that group. We believe we can complete these actions by the end of the fiscal year.

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**APPENDIX A:  
PERSONNEL CONTACTED**

<b><u>Name</u></b>	<b><u>Title</u></b>
Donald Gerth	President
George Anastas	Director, Environmental Health & Safety
Bruce Balon	Manager, Work Control
Thomas Custer	Safety Officer
JoAnne Davis	Worker's Compensation Coordinator
Debbie Decker	Chemical Hygiene Officer
Mary Ford	Benefits Coordinator
Howard Harris	Associate Vice President for Administration
Laurel Heffernan	Chair, Biology Department
Don Hendricks	Manager, Building Trades
Larry Hill	Director, University Cooperative Education Program
Delores Lackey	Staff Employment Manager
Roger MoorIndustrial Hygienist	
Paul Noble	Associate Dean, School of Natural Sciences & Mathematics
Shelia Orman	Director, Faculty Affairs
Mairo Ruiz	Director, Plant Services
Tony Sanchez	Supervising Custodian
Norman Scarr	Chief of Police
Jonathan Self	Director, Management Services
Kris Watson	Clerical Assistant