

**OCCUPATIONAL HEALTH**  
**CALIFORNIA STATE UNIVERSITY**  
**SYSTEMWIDE**

**Report Number 97-11**  
**March 2, 1998**

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## **ABBREVIATIONS**

CCR	California Code of Regulations
CSU	California State University
EH&S	Environmental Health and Safety
EMMP	Employee Medical Monitoring Program
EMMPM	CSU Sample Employee Medical Monitoring Program Manual
GISO	General Industrial Safety Orders
IIPP	Injury and Illness Prevention Program

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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 at the campuses visited.

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. The primary period of review was calendar years 1996 and 1997.

Our focus involved appropriate health and safety related records and procedures within the selected 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; and
- ▶ employee medical monitoring.

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## BACKGROUND

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 employees; development of compliance strategies; documentation/recordkeeping of safety and health related activities; and identification of the person responsible for administering the program.

## **OPINION**

Our opinion is based primarily upon our observations at the following eight campuses visited: Chico, Dominguez Hills, Fullerton, Fresno, Sacramento, San Bernardino, San Luis Obispo and San Marcos.

We found that these eight campuses were in general compliance with applicable State of California, CSU and individual campus directives. Campus specific findings and recommendations have been discussed and reported individually. The findings presented below were, in varying degrees of compliance, at each of the eight campuses visited and thus took on systemwide implications.

The comments that follow are intended to identify and mitigate issues that detract from the overall effectiveness of the existing CSU and individual campus health and safety programs.

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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]**

Existing processes related to implementation and documentation of health and safety inspections, reporting and corrective actions required some degree of improvement at each of the campuses visited. Full implementation of inspection policies and procedures will reduce the risk of injuries and illnesses, subsequent litigation including workers compensation claims and citations/fines by various regulatory agencies

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

Available campus training documents did not satisfactorily demonstrate that specific health and safety training requirements had been identified and applied timely to all campus employees. Assuring that all employees are provided required and timely health and safety training reduces exposure to injuries and illnesses, subsequent litigation including workers compensation claims and citations/fines by various regulatory agencies.

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

Health and safety training and information procedures for students were incomplete with respect to both on- and off-campus educationally related activities at each of the campuses visited. Establishing a

more comprehensive and uniform process of providing students with applicable health and safety training and information regarding both on- and off-campus activities reduces the risk of both injuries and illnesses to students and subsequent civil litigation.

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

Campuses had not identified all employees requiring medical monitoring nor always provided timely medical monitoring to those employees who were included in their campus employee medical monitoring programs. Assuring that all appropriate employees are both included in medical monitoring programs and provided timely medical monitoring reduces the risk of work related illnesses going undetected.

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# **OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES**

## **HEALTH AND SAFETY INSPECTIONS**

Existing processes related to implementation and documentation of health and safety inspections, reporting and corrective actions were in need of improvement at each of the campuses visited.

Some of the more common issues noted at the campuses visited included:

- ▶ Selected health and safety inspections (quarterly laboratory, annual fume hoods and monthly eyewash and shower equipment) were not always occurring within the established frequencies;
- ▶ Inadequate documentation regarding health and safety inspections;
- ▶ Follow-up procedures regarding deficiencies noted during inspections were often not reduced to writing or not implemented;
- ▶ Inadequate documentation regarding actions taken on deficiencies noted during inspections.
- ▶ Oversight responsibility varied between campuses and in some cases the responsibility was shared between individuals, offices or committees;
- ▶ The oversight responsibility was frequently unclear in the campus IIPP.

The CSU Model Injury and Illness Prevention Program (IIPP) § 10 and 12, among others, addresses the inspection requirements contained in California Code of Regulations (CCR) title 8 §3203, Injury and Illness Prevention Program. Individual Campus IIPP documents generally followed the CSU IIPP version.

Management at the campuses visited indicated that incomplete health and safety inspection processes were due to a lack of resources to assure full implementation and campuses not placing a high enough priority on compliance.

Failure to assure full implementation of inspection policies and procedures exposes the campuses and CSU to increased risk of injuries and illnesses, subsequent litigation including workers compensation claims, and citations/fines by various regulatory agencies.

### **Recommendation 1**

We recommend that the Chancellor's Office advise each campus of its obligation to both develop and assure implementation of occupational health and safety inspection and follow-up guidelines.

### **Management's Response**

We concur. FRM will advise each campus of its obligation to both develop and assure implementation of occupational health and safety inspection and follow-up guidelines. FRM's target date for completion is May 31, 1998.

## **Recommendation 2**

We recommend that the Chancellor's Office require each campus to supplement their existing Illness and Injury Prevention Program to specifically indicate the individual(s) charged with program responsibility for campus policy regarding health and safety inspections.

### **Management's Response**

We concur. FRM plans to prepare a communication to all campuses relating this legal requirement by May 31, 1998.

## **EMPLOYEE HEALTH AND SAFETY TRAINING**

Available campus training documents did not satisfactorily demonstrate that specific health and safety training requirements had been identified and applied timely to all campus employees.

Some of the more common issues noted at the campuses visited included:

- ▶ Documentation related to the identification of type and frequency of training required for individual employees ranged between incomplete to virtually non-existent;
- ▶ Based on available documentation, physical plant employees were provided more detailed health and safety training than that provided to employees in the three academic departments visited (Art, Biology and Chemistry). In addition, such documentation generally indicated that academic department technicians tended to receive more health and safety related training than faculty;
- ▶ Conversations with departmental staff indicated that internal health and service training sessions were frequently not documented;
- ▶ Procedures to assure that employees who miss scheduled health and safety training are identified and rescheduled for training, ranged from incomplete to virtually non-existent.
- ▶ Oversight responsibility varied between campuses, and in some cases, the responsibility was shared between individuals, offices or committees.
- ▶ Oversight responsibility was not always clearly stated in the campus IIPP.

The CSU Model Injury and Illness Prevention Program (IIPP) §13.0, among others, addresses the employee training requirements contained in California Code of Regulations (CCR) title 8 §3203, Injury and Illness Prevention Program. Individual Campus IIPP documents generally followed the CSU IIPP version.

The CSU Sample Environmental Health and Safety Training Program, dated April 1997, among others, recommends the use of Job Evaluation Profiles as a tool to help managers and supervisors identify which safety training courses their employees should be provided.

Management at the campuses reviewed indicated that a lack of resources was the primary cause for less than full implementation of employee health and safety training programs. In addition, a major

contributing factor for faculty not receiving training was due to the complexity of scheduling training around individual faculty instructional commitments.

Campuses are exposed to an increased risk of injuries and illnesses, subsequent litigation including workers compensation claims, and citations/fines by various regulatory agencies when employee health and safety training requirements are not identified and applied in a timely manner.

*(Comment:* In our Hazardous Materials Management Follow-up Systemwide Report 95-27 dated February 9, 1996, we recommended corrective actions regarding employee training – and corrective action was subsequently initiated. The corrective action included the development of both a CSU Sample Training Program Matrix and a CSU Sample Environmental Health and Safety Training Program. The latter document was not issued until April 1997 and implementation (or at least a campus based adaptation) had not occurred at the campuses visited.

### **Recommendation 3**

We recommend that the Chancellor's Office advise each campus of its obligation to assure implementation of employee training guidelines including the information contained in both the CSU Sample Training Program Matrix and CSU Sample Environmental Health and Safety Training Program.

### **Management Response**

We concur. FRM will advise each campus of its obligation to assure implementation of employee training guidelines including the information contained in both the CSU Sample Training Program Matrix and CSU Sample Environmental Health and Safety Training Program. FRM's target date for completion is May 31, 1998.

### **Recommendation 4**

We recommend that the Chancellor's Office require each campus to supplement its existing Illness and Injury Prevention Program to specifically indicate the individual(s) charged with program responsibility for campus policy regarding employee training.

### **Management's Response**

We concur. FRM plans to prepare a communication to all campuses restating this legal requirement by May 31, 1998.

## **STUDENT HEALTH AND SAFETY TRAINING**

Health and safety training and information procedures for students were incomplete with respect to both on- and off-campus educationally related activities at each of the campuses visited.

Some of the more common issues noted, in varying degrees, at the campuses visited included:

- ▶ There were no campus-wide procedures in effect to assure applicable faculty and staff were providing their students with the most up to date, and as uniform as possible, health and safety information and training regarding both on and off-campus educationally related activities.

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- ▶ The degree of health and safety information and training provided to students for off-campus academic activities (field trips, travel, and internships) varied widely between selected departments.
- ▶ Most academic departments visited had not developed minimal health and safety training and information to be provided to students working in labs. For the most part, this was left up to the individual faculty members to develop and circulate to their students.
- ▶ Procedures were not always established to assure that students were required to formally acknowledge that they had received lab health and safety information and training.
- ▶ Procedures were not always established to assure that students who missed the lab health and safety training were provided the training at a later meeting.
- ▶ Oversight responsibility varied between campuses and in some cases the responsibility was shared between individuals, offices or committees.
- ▶ Oversight responsibility was not always clearly stated in the campus IIPP.

Because there is no comprehensive and uniform state, CSU, and campus policy regarding student health and safety training, 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.

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

### **Recommendation 5**

We recommend that the CSU adopt systemwide policy and procedures/guidelines which specifically address those occupational health and safety issues related to CSU students involved in both the on-and off-campus educationally related activities addressed above.

### **Management's Response**

We concur. FRM will convene a task group with the objective of developing policy and procedures/guidelines which specifically address those occupational health and safety issues related to CSU students involved in both the on and off-campus educationally related activities addressed above. An initial target date of September 30, 1998 will be established.

## **EMPLOYEE MEDICAL MONITORING PROGRAM (EMMP)**

Campuses had not identified all employees requiring medical monitoring nor always provided timely medical monitoring to those employees who were included in their campus employee medical monitoring programs (EMMP).

Examples of common issues noted during our review included:

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OBSERVATIONS , RECOMMENDATIONS AND RESPONSES

- ▶ Documentation regarding the initial and follow-up efforts taken to identify and include employees in campus EMMPs ranged between incomplete to virtually non-existent;
- ▶ Procedures related to the identification of employees for inclusion in the campus EMMP at the time of employment were generally ineffective;
- ▶ Faculty, particularly those assigned to the art, biology and chemistry department where there was a greater amount of hazardous materials in the labs, were generally not included in their campus EMMP;
- ▶ Employees in the EMMP were not always provided their subsequent physicals on a timely basis.
- ▶ Oversight responsibility varied between campuses, and in some cases, the responsibility was shared between individuals, offices or committees.
- ▶ Oversight responsibility was not always clearly stated in the campus IIPP.

The CSU distributed a Sample Employee Medical Monitoring Program Manual (EMMPM) to the campuses circa July 1996. This EMMPM provides adequate guidance for the campuses in establishing their own EMMP and allows sufficient flexibility for the campuses to tailor their EMMP to their specific needs. Section 3.0 of the EMMPM cites the various titles and sections of the California Coded Regulations (CCR) that address specific preventive methods.

The CSU Model Injury and Illness Prevention Program §14.0 and 15.0 also addresses employee medical monitoring.

Management at the campuses reviewed indicated that EMMPs were deficient as a result of both poor communications between departments and a lack of resources

Incomplete medical monitoring programs increase the risk of work related illnesses going undetected.

*(Comment. In our Hazardous Materials Management Follow-up Systemwide Report 95-27 dated February 9, 1996, we recommended corrective actions regarding physical examinations for employees handling hazardous materials – and corrective action was subsequently initiated. The following recommendations are focused on medical monitoring for all employees under the umbrella of the Injury and Illness Prevention Program (IIPP) of which hazardous materials handling is a part.)*

## **Recommendation 6**

We recommend that the Chancellor's Office advise each of the campuses of its obligation to both assure all appropriate employees are included in their medical monitoring programs and that applicable physical exams are administered timely.

**Management's Response**

We concur. FRM will advise each of the campuses of its obligation to both assure all appropriate employees are included in their medical monitoring programs and that applicable physical exams are administered timely. FRM's target date for completion is May 31, 1998.

**Recommendation 7**

We recommend the Chancellor's Office require each of the campuses to supplement their existing Illness and Injury Programs to specifically indicate the individual(s) charged with responsibility for campus policy regarding employee medical monitoring.

**Management's Response**

We concur. FRM plans to prepare a communication to all campuses restating this legal requirement by May 31, 1998.

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**APPENDIX A:  
PERSONNEL CONTACTED**

**Name**

**Title**

Richard West  
Richard Leffingwell  
Susan McCormick  
Charlene Minnick

Senior Vice Chancellor, Business and Finance  
Director, Auxiliaries Planning and Bonds  
Industrial Hygenist  
Systemwide Risk Manager