

**OCCUPATIONAL HEALTH**  
**CALIFORNIA POLYTECHNIC STATE UNIVERSITY,**  
**SAN LUIS OBISPO**

**Report Number 97-13**  
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## **ABBREVIATIONS**

CCR	California Code of Regulations
CSU	California State University
CPSU-SLO	California Polytechnic State University, San Luis Obispo
EH&S	Environmental Health and Safety
EMMP	Employee Medical Monitoring Program
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.

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 and Design, Biological Sciences, Chemistry and Biochemistry and Facility Services. 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

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 Polytechnic State University, San Luis Obispo campus from May 27 through June 26, 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 inadequate with respect to timeliness and documentation of inspections; corrective actions taken; and, notification of inspection results to management with oversight responsibility. By assuring full implementation of inspection procedures, the campus will reduce the risk of injuries and illnesses, subsequent civil and criminal litigation and citations/fines by various regulatory agencies.

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

Campus health and safety training for employees was deficient with respect to: development of training requirements; timely training of employees; and documentation of training conducted. By assuring that training policies and procedures are fully implemented, the risk of employees not being provided timely health and safety training is decreased.

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

The campus did not have a standard in place for communicating and documenting health and safety instructions to students for either on or off-campus educationally related activities. By establishing a comprehensive and uniform process of providing students with applicable training and information regarding both on and off-campus educational activities, the campus will reduce the risk of both injuries and illnesses to students and subsequent civil litigation.

## **EMPLOYEE MEDICAL MONITORING [9]**

The campus had not identified all employees who should be included in their medical monitoring program. By assessing medical hazards on the campus and identifying all employees who should be medically monitored, the risk of work related illnesses going undetected are decreased.

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# OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

## HEALTH AND SAFETY INSPECTIONS

The campus health and safety inspection process was inadequate with respect to timeliness and documentation of inspections; corrective actions taken; and, notification of inspection results to management with oversight responsibility.

We found that:

- ▶ Environmental Health and Safety (EH&S) last documented an inspection of a campus department in June 1996;
- ▶ Facility Services last documented safety inspection was completed in July 1996; and
- ▶ There was no record of any formal safety inspections by either the Art or Biology departments.

Title 8, §3203, Injury and Illness Prevention Program (IIPP) and the *CPSU-SLO IIPP* manual section 10.0, HAZARD CONTROL PROCEDURES, section 12.0, HEALTH AND SAFETY INSPECTIONS, section 14.0, RECORD KEEPING and section 7.0, RESPONSIBILITIES requires: EH&S and campus departments to conduct periodic scheduled and unscheduled safety inspections; documentation and record retention of safety inspections; appropriate distribution of inspection reports for corrective action and; deans, directors, department chairs and department heads to develop procedures that ensure effective compliance with the IIPP.

The campus IIPP received final endorsement by the campus president shortly before our fieldwork was completed. However, the IIPP in its draft form was not distributed to campus departments, thereby alerting them to the inspection requirements.

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 fully implement inspection procedures related to timeliness and documentation of inspections, follow-up documentation and report distribution in order to assure compliance with state, CSU and campus regulations.

### **Campus Response**

We concur.

Environmental Health and Safety will disseminate the IIPP inspection requirements to all campus departments, emphasizing the department responsibilities for performing and documenting timely inspections. Inspection documents will be provided to all campus departments, per 10.1.c. of the campus IIPP, for department use and completion when performing inspections.

Environmental Health and Safety will perform periodic reviews of department inspection records to confirm the completion of required safety inspections and will perform unscheduled safety inspections pursuant to 10.2.c and 10.2.d of the campus IIPP.

Implementation dates:

- dissemination of the IIPP inspection requirements – completed
- dissemination of related inspection documents – March 1, 1998
- periodic reviews of department inspection records and unscheduled safety inspections – March 1, 1998

## **EMPLOYEE HEALTH AND SAFETY TRAINING**

Campus health and safety training for employees was deficient with respect to: development of training requirements; timely training of employees; and documentation of training conducted.

We found that:

- ▶ Specific training requirements, including frequency of refresher training had not been developed for each employee;
- ▶ Not all employees were receiving required training timely;
- ▶ Training records within the three academic departments visited did not provide any evidence of faculty receiving formal campus based training. Any training conducted within the academic departments was informal and not documented;
- ▶ Training records maintained in Facility Services were not adequate. As such, we were unable to determine that all Facility Services employees received all required training. We did note that various types of training were taking place; however there was no record of what the employee should have received as opposed to what they actually received;
- ▶ Departmental records did not show that new employees were provided appropriate training prior to being given assignments in areas where work hazards were present; and
- ▶ With the exception of training involving EH&S oversight, there were no procedures in place to assure that employees who missed regularly scheduled training sessions were identified and rescheduled for required training at a later date.

Title 8, §3203, IIPP and the *CPSU-SLO IIPP* manual section 9.0 SAFETY COMMUNICATIONS, section 13.0 EMPLOYEE SAFETY TRAINING and section 14.0 RECORD KEEPING, require: regular health and safety communications to employees; training for employees concerning general safe work practices as well as specific instruction with respect to hazards unique to each employee's job assignment; and, documentation and record retention of health and safety communications and training.

As previously noted, IIPP information was not generally distributed to campus constituents. Therefore, campus departments were not aware of the IIPP requirements.

Failure to assure training procedures are fully implemented increases the risk of employees not being provided timely health and safety training.

### **Recommendation 2**

We recommend that the campus strengthen existing training procedures, including implementation of the IIPP manual training requirements, to assure timely and complete training for all employees.

### **Campus Response**

We concur.

Environmental Health and Safety will disseminate the IIPP training requirements to all campus departments, emphasizing the department responsibilities for identifying employees requiring training and ensuring that these employees are properly trained. An abbreviated version of the sample Training Program Matrix will be sent to all campus departments to assist them in identifying operations requiring specific training.

A calendar will be published of campus-wide training programs which are provided by Environmental Health and Safety. Environmental Health and Safety will work with the campus Human Resources Department to evaluate the addition of a Training Requirements Checklist to our existing Position Description Form.

Implementation dates:

- Dissemination of the IIPP training requirements – completed
- Dissemination of sample Training Program Matrix – March 1, 1998
- Publication of campus-wide training programs – completed
- Training Requirements Checklist – March 1, 1998

## **STUDENT HEALTH AND SAFETY TRAINING**

The campus did not have a standard in place for communicating and documenting health and safety instructions to students for either on- or off-campus educationally related activities.

We found that:

- ▶ Students in both chemistry courses reviewed were required to attend safety orientation and to certify their attendance and understanding of the safety rules. In addition, chemistry student assistants were provided additional training and required to pass a safety test before assuming their responsibilities;
- ▶ Students in both art courses reviewed were required to attend safety orientation. However, the students were not required to certify their attendance or acknowledge that the safety orientation presentation was understood;
- ▶ In one of the two biology courses reviewed, no documentation existed to verify that safety instructions were presented. In the other, safety rules were provided with the course syllabus. However, students were not required to certify their attendance or acknowledge that the safety orientation presentation was understood.

There was no single office or campus policy from which all off-campus programs were subject to uniformity in addressing student health and safety issues. Off-campus programs include field trips, internships and workshops.

There were no campus-wide procedures in effect to assure that 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.

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. The recently approved campus IIPP manual contains general policy statements regarding health and safety training information for students. The campus was preparing to distribute the IIPP to the various campus departments at the conclusion of our visit

By not establishing a 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 a comprehensive program that addresses both on and off campus student health and safety training and information issues.

### **Campus Response**

We concur.

Environmental Health and Safety will coordinate the development of a working group from Academic Affairs and Student Affairs to design campus guidelines for student health and safety training and information.

Implementation date:

- Formation of working group to design guidelines – May 1, 1998.

## EMPLOYEE MEDICAL MONITORING

The campus had not identified all employees who should be included in their employee medical monitoring program (EMMP).

Approximately 90 employees were included on the most current campus employee medical monitoring program (EMMP) listing. We did not note any faculty members being included in this program even though there are hazardous materials in a number of academic workplaces. However, we noted that several staff laboratory technicians working in the same workplaces as faculty were included in the program.

The campus had not written a CPS-SLO specific EMMP. However, the manager, EH&S indicated the campus follows the *SAMPLE CSU EMMP MANUAL*.

Previously, inclusion of employees in the EMMP had been initiated by those who were aware of the program or the EH&S Manager had physically observed employees working in conditions that would qualify them for inclusion in the EMMP.

A sample of ten employees included in the medical monitoring program disclosed two instances where an employee was not receiving regular medical examinations. In one instance, the employee refused testing and in the other instance the employee failed to show up for his medical examinations during the last two years.

*SAMPLE CSU EMMP MANUAL* §1.2 (a) states:

A comprehensive medical surveillance program should include exposure assessment, hazard control and employee education.

*SAMPLE CSU EMMP MANUAL* §1.2 (f) states:

California Code of Regulations (CCR) requires that employees with potential exposures to certain harmful agents shall receive medical monitoring examinations

...

*SAMPLE CSU EMMP MANUAL §2.2* states:

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 manager, EH&S indicated that he contacted campus departments several years ago regarding medical monitoring procedures but received minimal results. The manager, EH&S indicated that with the recent approval of the campus IIPP there should now be a wider acceptance of the EMMP.

By not making a thorough assessment of medical hazards on the campus and identifying all employees who should be medically monitored, the risk of work related illnesses going undetected are increased.

#### **Recommendation 4**

We recommend that the campus:

- a. conduct an additional campus-wide assessment of its medical hazards;
- b. include all appropriate employees in the medical monitoring program; and
- c. assure that all employees in the EMMP are provided appropriate and timely medical examinations.

#### **Campus Response**

We concur.

Environmental Health and Safety will develop a checklist for identifying employees performing tasks which would require further assessment or would automatically require inclusion in the medical monitoring program. This checklist will be used to survey all campus departments. Employees identified as requiring medical monitoring will be included in the campus medical monitoring program.

Environmental Health and Safety will work with the campus Human Resources Department to evaluate the addition of a Medical Monitoring Requirements Checklist to our existing Position Description Form.

For those individuals who fail or refuse to undergo required medical test this action shall constitute a failure or refusal to perform the normal and reasonable duties of the position. In such an event, our campus will continue to utilize appropriate disciplinary action (Coded letter HR 96-04).

Implementation dates:

- Development of checklist – March 1, 1998
- Evaluation of the addition of a Medical Monitoring Requirements Checklist – March 1, 1998.

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## APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Warren Baker	President
Dwight Alford	Equipment Technician, Art and Design
Philip Bailey	Dean, College of Science and Math
Kurt Brown	Instructional Support Technician, Art and Design
Albert Censullo	Department Chair, Chemistry and Biochemistry
Larry Grimes	Coordinator/Technical Support, Biological Sciences
VL Holland	Chair, Biological Sciences
Eric Johnson	Chair, Art and Design
Lori LaVine	Instructional Support Technician, Chemistry and Biochemistry
Frank Lebens	Vice President, Administration and Finance
Joan Lund	Training and Worker's Compensation Manager, Human Resources
Edward Naretto	Director, Facility Services
Robert Pattee	Associate Director, Facility Services
Robert Pahlow	Assistant Director, Facility Services
Joseph Risser	Risk Manager, Risk Management
Harry Sharp	Dean, College of Liberal Arts
Vickie Stover	Associate Vice President for Finance
Mikie Steineke	Worker's Compensation Specialist, Human Resources
David Ragsdale	Manager, Environmental Health and Safety