EHS and Risk Management Across the CSU
April 2023

Presented by Scott Bourdon
Fitting the Pieces Together Conference in San Diego
These rates are all higher than national university EHS staffing rates (though comparing the complex regulatory environment and enhanced stakeholder expectations in CA with national universities is not directly comparable).
EHS Job Vacancies

How many vacancies do you have in your regular EHS staffing numbers (the budgeted EHS staff positions noted in your annual report)?

- zero vacancies (7 responses)
- 2 vacancies (6 responses)
- 1 vacancy (5 responses)
- 3 or more vacancies (0 responses)

Request – Ask campuses to fill vacancies; ensure salaries are adequate; and consider using the new EHS Classification Series (even as a pilot project if it is not finalized.)

17 vacancies = 13.5% of the 126.21 budgeted FTE
SRM Efforts in this Area

SRM is interviewing applicants for a Systemwide Analyst; CSURMA will fund the position to support campuses with:

- SRM will hire a Training and Compliance Administrator.
- CSU will establish and EHS-specific job classification.
- An EHS benchmarking and professional development expert provided training for CSU EHS teams.
Logic model of the EHS program.
# Program Review Results—Environmental

<table>
<thead>
<tr>
<th>Plan / Program</th>
<th>Reviewed / Implemented / Submitted</th>
<th>Not Reviewed / Implemented / Submitted</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stormwater Pollution Prevention</td>
<td>15*</td>
<td></td>
<td>5</td>
</tr>
<tr>
<td>Hazardous Waste Minimization</td>
<td>7*</td>
<td>2</td>
<td>11</td>
</tr>
<tr>
<td>Hazardous Materials Business</td>
<td>19*</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Medical Waste Management</td>
<td>18*</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Spill Prevention Control and Countermeasure</td>
<td>18*</td>
<td></td>
<td>2</td>
</tr>
</tbody>
</table>

*Campus status

Data request submitted to East Bay, Pomona, Fullerton
### Selected Systemwide Programs Reviews

<table>
<thead>
<tr>
<th>Program</th>
<th>2021 % Reviewed</th>
<th>2022 % Reviewed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arc Flash / Electrical Safety</td>
<td>41%</td>
<td>40%</td>
</tr>
<tr>
<td>Lockout / Tagout</td>
<td>50%</td>
<td>65%</td>
</tr>
<tr>
<td>Confined Space Entry</td>
<td>53%</td>
<td>40%</td>
</tr>
<tr>
<td>Powered Industrial Truck</td>
<td>55%</td>
<td>50%</td>
</tr>
<tr>
<td>Asbestos</td>
<td>57%</td>
<td>90%</td>
</tr>
</tbody>
</table>

4 of the 5 can result in immediate risk of serious injury or death. So, program review for these programs needs to be an important area of focus this year.
## Employee Training

<table>
<thead>
<tr>
<th>Training Compliance</th>
<th>Campus Compliance %</th>
<th>Systemwide Average Compliance %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Injury &amp; Illness Prevention Program*</td>
<td>70% (4/3/2023)</td>
<td>TBD</td>
</tr>
<tr>
<td>Hazard Communication</td>
<td>82%</td>
<td>TBD</td>
</tr>
<tr>
<td>Hazardous Waste</td>
<td>0%</td>
<td>TBD</td>
</tr>
<tr>
<td>Employee Lab Safety</td>
<td>95%</td>
<td>TBD</td>
</tr>
</tbody>
</table>

Substantial compliance would be considered 95%.

*The SLD compliance dashboard provided the IIPP data; the other data is from the Annual Reports.*
## Injury Rates

<table>
<thead>
<tr>
<th>CSU</th>
<th>Campus Injury Rate (IR)(^1) 2022</th>
<th>CSU</th>
<th>Campus Lost Time (LT) IR(^1) 2022</th>
<th>2021 State Educational Services IR*</th>
<th>2021 State Educational Services LT IR*</th>
<th>2021 National Higher Ed IR**</th>
<th>2021 National Higher Ed LT IR**</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.38</td>
<td>TBD</td>
<td>0.65</td>
<td>TBD</td>
<td>1.5</td>
<td>0.5</td>
<td>1.4</td>
<td>0.4</td>
</tr>
</tbody>
</table>

* State IR and LT IR are from CA Department of Industrial Relations, Table 1. Incidence rates\(^1\) of nonfatal occupational injuries and illnesses by selected industries and case types, California, 2021...Educational services Code 611

**National IR and LT IR are from BLS TABLE 1. Incidence rates\(^1\)of nonfatal occupational injuries and illnesses by industry and case types, 2021 for Colleges, universities, and professional schools NAICS Code 6113
Regulatory Activity

Please share lessons learned or updates with other campuses and SRM.

- **Cal/OSHA-Now considers the CSU as one employer and repeat violations could result in serious violations at other campuses.**
  - AQMD-A tier 5 category could result in stricter regulations.
  - RWQCB-Regulates stormwater pollution and sanitary sewer discharge.
  - Environmental Health-Regulates pools and retail food facilities.
  - CUPA-Regulates hazardous materials
Workers’ Comp

- What are two or three things you/campus/system can do better?
- What are two or three things that work well and/or add value?
- What are your interactions between EHS/WC like for investigations, Cal/OSHA reporting for injuries, other issues?
- Anything you would like to discuss?
Risk Management

• What are two or three things you/campus/system can do better?
• What are two or three things that work well and/or add value?
• What are your interactions like with EHS, Workers’ Compensation, especially for investigations and regulatory reporting?
• Anything you would like to discuss?
• Is there a good way to track under-deductible claims Systemwide?
Facilities
Arc Flash Protection
Fall Protection
Scientific Marine Operations
Marine Facilities
Marine Facilities
Marine Facilities
Marine Facilities
Marine Facilities Shared
Marine Research
Marine Research
Marine Research
Scientific SCUBA Diving

Cal/OSHA exempts research diving from commercial diving regulations with Dive Safety Board oversight and a Dive Safety Manual. Dive Safety Officers need to oversee all dive outings.

- Review Dive Safety plans and conduct Risk Assessments.
- Follow American Academy of Underwater Scientists standards.
- Provide training and confirm divers have completed training.
The CSU plans a scientific SCUBA diving peer review safety audit.
CSU DSOs routinely collaborate with DSOs from UC and numerous national and international institutions.

Scientific SCUBA Diving Programs

• MLML Consortium: San Jose, East Bay, San Francisco, Sacramento, Fresno, Stanislaus, and Monterey Bay

• CSU/OSI Consortium: Channel Islands, Dominguez Hills, Fullerton, Long Beach, Los Angeles, Northridge, Pomona, and San Bernardino

• San Diego
• San Luis Obispo
• Monterey Bay

• San Francisco
• Humboldt
Scientific SCUBA Diving
Scientific SCUBA Diving
Safety Documentation

Choking/Strangulation Release and Waiver

1. Date of signed waiver
   ________________

2. Legal Name
   _______________________

3. Local Address
   _______________________

4. Email Address
   _______________________

5. Family Staff Grad Undergrad Non-CSU
   _______________________

6. Emergency Contact Information
   Name: _______________________
   Relationship: _______________________
   Phone: _______________________
   ________________

7. Release and Waiver
   The undersigned, and in the event the undersigned is under 18 years of age, the undersigned's parent or guardian, for and in consideration of granting permission by the Trustees of the State University and College System of the California State University to participate in any way in the following activity:

   _______________________

   under the authority of San Diego State University, hereby hold(s) harmless and release(s) and forever discharge(s) the Trustees of the State University and College System, the Board of Trustees, the Athletics Director, the Choking and Strangulation Officer, employees in the choking and strangulation programs, local operators, choking booths, and all other agents, employees, contractors, and employees therein in their individual capacities or by reason of their relationship to the said Trustees of the State University and College System and their successors, from any and all claims and demands whatsoever, which the undersigned and any of their heirs, representatives, executors, and administrators thereof, or any other person acting on their behalf, or on behalf of the State University and College System, or any or all of the above mentioned persons or their successors, by reason of any accidents, illness, injury or death, or other consequence arising of resulting directly or indirectly from participation in choking activities under the auspices of the State University and College System, and occurring during said participation, or at any time subsequent thereto.

   _______________________

   I hereby declare that I am of legal age and am competent to sign this Agreement and, if not, that my parent or legal guardian shall sign on my behalf and that my parent or legal guardian is in complete understanding and accordance with this Agreement.

   _______________________
   _______________________
   _______________________
   _______________________

Signature Date
Signature of Parent or legal guardian if participant is a minor
Signature Date
Signature of witness, who is not a minor
Signature Date
Scientific Boating

Research boating includes similar precautions as SCUBA diving. Boating Safety Officers should oversee boat outings.

- Review “float” safety plans and conduct Risk Assessments.
- Follow pertinent standards.
- Provide training and confirm boaters have completed training.
Scientific Boating
Scientific Boating
Agriculture
Agricultural Operations EHS

Agriculture research and teaching at four campuses involve risks and serious injuries have occurred.

• A CSU Agriculture Safety Webinar was delivered in Fall 2021.
• Alliant Insurance can assist with safety assessments.
• Sharing of safety training and collaboration is planned.
• Pomona has a embedded safety professional.
Agricultural Operations
Agricultural Equipment
Agricultural Equipment
Agricultural Equipment
Large Animals
Common Challenges

• Vacancies, turnover, and staffing
• Infrastructure challenges
• Diversity of operations, systems, vendors, environments, and cultures
• Lack of clarity between campus and auxiliary orgs for risk and EHS
• Increase in regulatory oversight and complexity
• Innovative approaches blurring lines and lack precedent
Keys to Meeting the Challenge

• Collaboration
• Accountability
• Decentralization in some cases and centralization in others
• Strategic thinking
• Succession planning and bench strength
Thank You

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