

California Institute of Technology

INJURY AND ILLNESS PREVENTION PROGRAM



Caltech Environmental Health and Safety Office
1200 E. California Blvd., M/C 25-6
Pasadena, CA 91125
Phone: 626.395.6727
Fax: 626.577.6028
Email: safety@caltech.edu
Website: www.safety.caltech.edu

2022

INJURY AND ILLNESS PREVENTION PROGRAM

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INTRODUCTION

The California Institute of Technology (Caltech) is committed to conducting work activities in a manner that promotes the safety and health of employees and complies with all applicable occupational health and safety regulations. Activities at Caltech should be conducted in accordance with the following guiding principles:

- The responsibility for implementing and maintaining a safe work environment rests on all employees at Caltech;
- Supervisory personnel are responsible for establishing safe work practices in their respective laboratories or workplaces, and for providing safe equipment and facilities for employees;
- All employees are expected to follow proper and safe work procedures, and to report accidents, unsafe conditions or practices promptly to their Supervisor; and
- Institute activities must comply with all applicable federal, state, and local environmental, health and safety laws and regulations.

Per [California Code of Regulations \(CCR\), Title 8, § 3203](#), Caltech has implemented this Injury and Illness Prevention Program (IIPP) which describes specific requirements for program responsibility, compliance, communication, hazard assessment, and accident / exposure investigations. A copy of the IIPP is [available online](#), as well as at the Environmental Health and Safety Office.

Caltech established a COVID-19 Information Resources and Support website, [Caltech Together](#), pursuant to elements of the Emergency Temporary Standards in place for COVID-19. This document references Caltech Together wherever applicable. Additional Cal/OSHA requirements tailored to Caltech, are detailed in this document.

RESPONSIBILITIES

The ultimate responsibility for Caltech's IIPP rests with the President of the Institute.

PROGRAM ADMINISTRATOR

The Program Administrator is:

Name: Lauriane Quenee, PhD, RBP, CBSP
Title: Interim Director – Environmental Health and Safety
Address: 1200 E. California Blvd., M/C B125-6, Pasadena, CA 91125
Telephone: (626) 395-6727

COVID COORDINATOR

The Assistant Vice President for Student Affairs and Wellness has the responsibility to coordinate the Institute's COVID prevention measures.

ASSOCIATE VICE PRESIDENTS, DIRECTORS, AND DIVISION OPERATIONS OFFICERS

Associate Vice-Presidents, Directors, and Division Operations Officers are responsible for ensuring:

- Individuals under their management have the authority to implement appropriate

- health and safety policies, practices, procedures, and programs;
- Areas under their management have funding for health and safety programs, practices, policies, procedures, and equipment; and
- Areas under their management are in compliance with Caltech's health and safety practices, policies, procedures, and programs.

SUPERVISORY PERSONNEL: FACULTY AND SUPERVISORS

Faculty and Supervisors are responsible for implementing Caltech's IIPP. This includes:

- Ensuring that workplaces and equipment are safe, well maintained, and in compliance with local and federal governmental regulations as well as Caltech's policies, procedures, programs, and practices;
- Ensuring that workplace safety and health practices and procedures are clearly communicated and understood by employees through training programs;
- Enforcing health and safety rules fairly and uniformly as they relate to job performance;
- Acknowledging employees who make a significant contribution to maintenance of a safe workplace, and disciplining employees who fail to follow safe work practices;
- Encouraging employees to report workplace hazards without fear of reprisal;
- Ensuring that periodic, scheduled workplace inspections/surveys are conducted, and that identified health and safety deficiencies are corrected in a reasonable time period;
- Ensuring that workplace incidents (i.e., injuries, exposures, or illnesses) are reported and investigated, and that corrective actions are taken; and
- Ensuring that inspections/investigations and employee records are kept for the designated time period(s).

EMPLOYEES

Employees are responsible for following the requirements of this IIPP, which involves:

- Keeping themselves informed of conditions affecting their health and safety;
- Participating in training programs as required;
- Adhering to healthy and safe practices in their workplace; and
- Reporting to their Supervisors any potential workplace hazards and incidents (i.e., injuries, exposures, or illnesses).

ENVIRONMENTAL HEALTH AND SAFETY OFFICE

The Environmental Health and Safety Office (EH&S) is responsible for:

- Developing Program-Specific Training;
- Assisting in conducting workplace hazard assessments to identify, evaluate, and correct hazards; and
- Reviewing, updating, and evaluating the overall effectiveness of the IIPP.

COMPLIANCE

Managers and Supervisors are responsible for ensuring that all workers comply with safe work practices to include:

- Recognition for following safe and healthful work practices;

- Providing training when safety performance is deficient; and
- Disciplining workers for failure to comply with safe and healthful work practices.

COMMUNICATION

Supervisors and managers must communicate with their employees, contractors and volunteers about occupational hazards and appropriate protective measures, in a manner readily understood by all personnel. Communication strategies include the following:

- Multi-tiered training program;
- Meetings;
- Supporting safety programs, policies, and guidelines;
- Health and Safety Resources; and
- Process to report workplace hazards.

COVID-19 SYSTEM FOR COMMUNICATIONS

COVID-19 Information Resources and Support website, Caltech Together, provides information pertaining to COVID-19 policies and guidance along with reporting requirements.

TRAINING

The objective of the Institute's safety training program is to protect the health and safety of employees. Training is provided:

1. To all new employees;
2. To employees given new job assignments for which training has not previously been received;
3. Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
4. Whenever the employer is made aware of a new or previously unrecognized hazard; and
5. For supervisors to familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed.

MULTI-TIERED TRAINING PROGRAM

Caltech organizes its training system into a multi-tiered program as described below:

TIER 1: NEW EMPLOYEE ORIENTATION

- New Employee Orientation is provided by [Human Resources](#) to all new employees. This includes information on Caltech's environmental, health, safety and emergency preparedness policies and practices, employee health and safety rights and responsibilities, health and safety services, and what the employee should expect in terms of further training.

TIER 2: PROGRAM-SPECIFIC TRAINING

- Employees are required to have [program-specific](#) training on hazards they may encounter in labs, shops, or other workplaces.

TIER 3: WORKPLACE-SPECIFIC TRAINING

- *Supervisors* ensure employees are appropriately trained. [Workplace specific training](#) is defined by the hazards employees work with in their environment.

TRAINING RESOURCES FROM EH&S

- EH&S assists Divisions and Departments in providing health and safety training to employees on a variety of topics. Training information can be accessed on-line through: <https://www.safety.caltech.edu/training-/training-opportunities>.

MEETINGS

Meetings can be a mechanism to reinforce important concepts including the following:

- Clearly communicate health and safety programs and procedures to employees;
- Encourage employees to report workplace hazards to management without fear of reprisal; and
- Encourage employees to report workplace incidents (i.e., injuries, exposures, and illnesses).

SUPPORTING SAFETY PROGRAMS, POLICIES, and GUIDELINES

As part of the Institute's ongoing safety commitment, supporting safety programs, policies, and guidelines as listed in [Appendix A](#) have been developed to assist in preventing accidents and injuries.

HEALTH AND SAFETY RESOURCES

Health and safety resources are available from the EH&S Office.

- EH&S website: <https://www.safety.caltech.edu/>

COVID-19 TRAINING

Information on the Institute's [Caltech Together](#) site and [back to work training video](#) provide Caltech's policies and procedures to protect against COVID-19 along with information on the hazards associated with COVID-19. It also provides information on accessing COVID-19 testing and vaccination. It presents information on the fact that vaccination is effective at preventing COVID-19, protecting against both transmission and serious illness or death.

REPORTING HAZARDOUS CONDITIONS

Employees are encouraged to report potential health or safety hazards to their Supervisors. Supervisors are responsible for following-up on employee suggestions and concerns communicated to them. EH&S can assist in this effort.

Employees can also report hazards or share a health and safety concern (anonymously, if desired) by using one of the following methods:

- Directly to the EH&S Office by calling (626) 395-6727 or x6727; or
- Contacting the Caltech Compliance Hotline at (626) 395-8787 or x8787 or on-line at <https://hotline.caltech.edu>

No employee will be subject to reprisal for reporting hazards or potential hazards, or for making suggestions related to workplace health and safety.

IDENTIFYING AND EVALUATING WORKPLACE HAZARDS

INSPECTIONS

Supervisors conduct workplace evaluations to identify and evaluate hazards when:

- New substances, processes, procedures, or equipment are introduced into the workplace that represent a new occupational and health hazard; or
- New or unrecognized hazards in the workplace are identified.

Supervisors may develop and use their own self-inspection checklists or use the self-inspection checklists available including:

- [Shipping and Receiving Self-Inspection Checklist](#)
- [Dining Services Self-Inspection Checklist](#)
- [Shop Self-Inspection Checklist](#)
- [Vehicle Self-Inspection Checklist](#)
- [Office Self-Inspection Checklist](#)
- [Laboratory Self-Inspection Checklist](#)

EH&S conducts periodic surveys to identify unsafe conditions and work practices.

IDENTIFICATION AND EVALUATION OF COVID-19 HAZARDS:

The Institute's [Caltech Together](#) site and [back to work training video](#) list the Institute's efforts in identifying and evaluating COVID-19 hazards.

EMPLOYEE SCREENING

[Caltech Together](#) also provides information on how Caltech screens employees and responds to those with COVID 19 symptoms. This includes [information on COVID 19 testing, contact tracing, case log, notification process, and vaccination](#).

INCIDENT/ ACCIDENT INVESTIGATION AND REPORTING PROCESS

The Supervisor reports all emergencies, injuries, or illnesses to the Security Department at extension 5000. Security reports all health and safety-related incidents to Disability and Leave Administration Unit and EH&S. EH&S will assist into investigating the immediate and underlying causes and identifying corrective actions as warranted.

- **In the event of an injury**, supervisors must submit a completed [Supervisor's Injury Investigation Report](#) to Disability and Leave and EH&S as soon as possible, not to exceed three (3) days.
 - Disability and Leave must provide the completed [Supervisor's Injury Investigation Report](#) to EH&S as a back-up in the event Supervisor did not send a copy to EH&S.
 - Caltech's Third Party Administrator (TPA) generates an Employer's Report of Occupational Injury or Illness (Form 5020) and forwards a copy to both Disability and Leave and EH&S.
- **In the event of a "Near Miss" or to report an unsafe condition**, Supervisors should complete an [Incident Report](#), sign the Report then send to

safety@caltech.edu so an EH&S Representative can review and sign the report after verifying the corrective action plan is complete.

SERIOUS INJURY, ILLNESS, OR FATALITY

- The Disability and Leave Unit will immediately notify EH&S in the event of a “Serious injury, illness, or fatality”
 - Cal/OSHA defines an injury or illness as “serious” if it:
 - Requires in-patient hospitalization for a period in excess of 24 hours for other than medical observation; or
 - An employee suffers a loss of any member of the body; or
 - An employee suffers any serious degree of permanent disfigurement.

INVESTIGATING AND RESPONDING TO COVID-19 CASES

All members of the Caltech community are required to check for symptoms of illness before reporting to campus but are no longer required to complete the online health attestation form or to record the building locations they visit each day.

Individuals who are ill or experiencing symptoms of illness are not to come to campus or report for on-site work and must record their illness through the [COVID-19 Reporting Application](#) so that a member of Caltech's Student Wellness Services team may follow up as appropriate.

REPORTING, RECORDING, AND ACCESS

It is our policy to:

- Report information about COVID-19 cases and outbreaks at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Make our written COVID-19 Prevention Program available at the workplace to employees and to representatives of Cal/OSHA immediately upon request.
- Use Employer's Report of Occupational Injury or Illness (5020 form) to keep a record of and track work related COVID-19 cases.

EH&S will notify Cal/OSHA as required.

RETURN TO WORK CRITERIA

Return to work criteria is available on the Institute [Caltech Together](#) site.

HAZARD CORRECTION

Unsafe or unhealthy work conditions, practices, or procedures must be corrected in a timely manner based on the severity of the hazard(s). Hazards must be corrected:

- When any hazard is observed or discovered; or
- If an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property.
 - All exposed personnel will be removed from the area, except those necessary to correct the existing condition; and

- Employees correcting the hazardous condition must be provided with the necessary safeguards.

CONTROL OF COVID-19 HAZARDS

Caltech Together lists [Caltech's Response to LA County Face Covering Recommendations](#). In addition, Caltech Together provides a Guide for the Caltech Community [While on Campus](#) explaining cleaning and disinfecting procedures. Testing of symptomatic employees is explained on the [Caltech Together site](#) as well.

PERSONAL PROTECTIVE EQUIPMENT (PPE) USED TO CONTROL EMPLOYEES' EXPOSURE TO COVID-19

The need for PPE (such as gloves, goggles, and face shields) is evaluated and provided as needed. Upon request, respirators are provided for voluntary use to all employees who are not fully vaccinated. Prior to issue, employees must obtain respiratory clearance and related fit-testing per the [Institute Respiratory Protection Program](#).

TESTING OF SYMPTOMATIC EMPLOYEES

All employees, students, and campus affiliates who have not verified their vaccination status with the Institute through the [COVID-19 Vaccination Documentation application](#), as well as any students living on-campus in undergraduate congregate living, will be required to participate in the Institute's surveillance testing program. This requirement extends to all unvaccinated members of the community who report to campus, even on an occasional or one-day-a-week basis.

DOCUMENTATION

Supervisors must keep documentation to demonstrate compliance with regulations and standards for at least one year or as per the [Institute's Records Retention Schedule](#).

Required documents include:

1. Records of scheduled and periodic inspections to identify unsafe conditions and work practices, including person(s) conducting the inspection, the unsafe conditions and work practices that have been identified, and action(s) taken to correct the identified unsafe conditions and work practices; and
2. Documentation of safety and health training for each employee, including employee name or other identifier, training dates, type(s) of training, and training providers. Training records shall be maintained in accordance with the [Institute's Records Retention Schedule](#).
 - a. Supervisors and Faculty maintain records of safety training for their employees.
 - b. EH&S maintains records of training conducted by EH&S staff.

APPENDIX A: SUPPORTING SAFETY GUIDES, PROGRAMS & MANUALS

- [Asbestos Management Program](#)
- [Biosafety Manual](#)
- [Bloodborne Pathogen Exposure Control Program](#)
- [Chemical Hygiene Plan](#)
- [Confined Space Program](#)
- [Construction Guide](#)
- [Emergency Management Plan](#)
- [Fall Protection Program Guide](#)
- [Fire Prevention Plan](#)
- [Hazard Communication Program](#)
- [Hearing Conservation Program](#)
- [Heat Illness Prevention Program](#)
- [Industrial Truck Policy \(Caltech Cart Policy\)](#)
- [Laser Safety Manual](#)
- [Lockout / Tagout Program](#)
- [Radiation Safety Manual](#)
- [Respiratory Protection Program](#)

APPENDIX B: QUICK LINKS TO COVID-RELATED MATERIALS

- [Title 8, § 3203: California Code of Regulations \(CCR\)](#)
- [Caltech Together:](#) Caltech's COVID-19 Information Resources and Support website
- [Caltech's Response to LA County Face Covering Recommendations](#)
- [COVID-19 Reporting Application](#)
- [COVID-19 Vaccination Documentation application](#)
- Institute [back to work training video](#)
- [Institute Records Retention Schedule](#)
- [Program-specific](#) training on hazards in labs, shops, or other workplaces
- Caltech Compliance Hotline: <https://hotline.caltech.edu>