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California Institute of Technology

Aerosol Transmissible Diseases Exposure Control Plan



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CHAPTER I: INTRODUCTION

The **California Institute of Technology (Caltech)** is committed to conducting work activities in a manner that promotes the safety and health of faculty, staff, students, and visitors and complies with all applicable occupational health and safety regulations. The following Aerosol Transmissible Diseases (ATD) Exposure Control Plan (ECP) is provided to eliminate or minimize occupational exposure to aerosol transmissible infectious diseases in accordance with California Code of Regulations, Title 8, § [5199](#). The ATD Standard applies to all Caltech personnel who have occupational exposures to infectious diseases that spread by inhalable particles and droplets. Because research activities in Caltech laboratories, as well as activities supporting the research effort and student life, may expose Caltech employees to microorganisms which cause disease to humans, this plan is designed to eliminate or reduce occupational exposures. This plan also sets forth procedures, control measures, and equipment designed to eliminate or minimize risk from exposure to a novel pathogen such as SARS-CoV-2, the causative agent for COVID-19.

The ATD ECP is a key document to assist Caltech members in implementing and ensuring compliance with the Standard. This ECP includes:

- Program administration
- Determination of exposure risk including high hazard procedures
- Implementation of various methods of exposure control, including
 - Engineering and workplace controls
 - Personal protective equipment
 - Waste management and housekeeping
 - Source control procedures
- Vaccination program
- Post-exposure management
- Communication of hazards and training
- Surge procedures
- Recordkeeping

CHAPTER II: PROGRAM ADMINISTRATION

The Caltech Environment, Health, and Safety (EHS) Office and the Institute Biosafety Officer (BSO) are responsible for implementation of the ATD ECP. The ECP will be maintained, reviewed, and updated at least annually and whenever necessary to include new or modified tasks and procedures. Contact Info: safety@caltech.edu; 626-395-6727 (x6727).

Those employees who have occupational exposure to aerosol transmissible infectious materials must comply with the procedures and work practices outlined in the ATD ECP.

Each Caltech Division, Department, and Laboratory will provide and maintain all necessary personal protective equipment (PPE) and engineering controls (e.g., annually certified Biosafety Cabinet) as required. During a pandemic event with a novel aerosol transmissible pathogen or an outbreak of a known pathogen, the Institute also maintains a strategic stock of PPE in case of a surge event. Caltech Divisions, Departments, and Laboratories will ensure adequate supplies of equipment are readily available in the appropriate size(s). Employees are advised to contact their direct Supervisors for more information.

The EHS Office and BSO will be responsible for training, documentation of training, and making the written ATD ECP available to Caltech personnel as well as OSHA and NIOSH representatives as requested. Contact info: safety@caltech.edu; 626-395-6727 (x6727).

CHAPTER III: EXPOSURE DETERMINATION/JOB CLASSIFICATION

Caltech is a world-renowned science and engineering Institute whose academic divisions’ research and education focus on Biology and Biological Engineering; Chemistry and Chemical Engineering; Engineering and Applied Science; Geological and Planetary Sciences; Humanities and Social Sciences; and Physics, Mathematics and Astronomy. For exposure determination, employees are sorted into two main categories: employees engaged in research activities in research laboratory and animal facility settings (e.g., professors, research technicians, post-doctoral fellows, PhD candidates, or Office of Laboratory Animal Research (OLAR) personnel) and, employees involved in the support of research activities and student life (e.g., Security staff or Student Wellness Services (SWS) staff) who provide first aid and/or medical support to Caltech personnel.

For all groups, exposure determination is made through distinct risk assessments performed by EHS personnel, the attending veterinarian serving as OLAR Director, and/or the BSO.

A. EXPOSURE DETERMINATION FOR RESEARCH GROUPS—INCLUDING OLAR

Risk assessment and exposure determination for employees within research and OLAR groups is performed in part by the Institutional Biosafety Committee (IBC). The IBC, with the support of the BSO and OLAR Director, reviews, evaluates the risks, and approves research activities involving manipulations of clinical samples collected on human or animal subjects that are likely to carry aerosol transmissible pathogens (SARS-CoV-2, influenza, etc.) as defined by the [Cal/OSHA ATD Standard](#). All OLAR employees and employees registered on an IBC protocol for the use of these materials are considered at risk for potential exposure to aerosol transmissible pathogens.

The Cal/OSHA ATD standard permits employers with research laboratory operations in which employees do not have direct human patient contact to establish, implement, and maintain an effective, written Biosafety Plan meeting the ATD requirements in lieu of an Exposure Control Plan for those operations.

Therefore, Caltech maintains an Institute-wide [Biosafety Manual](#) that identifies procedures, practices and training programs designed to limit exposures to aerosol transmissible pathogens in research laboratory settings. Individual laboratories also maintain specific Lab Safety Manuals and SOPs designed to limit exposure to infectious material.

The risk of exposure and risk mitigation procedures for OLAR personnel are described in Caltech’s Animal Research Program description. OLAR SOPs are designed to limit exposure to infectious material.

The table below summarizes the various research groups with reasonably anticipated risk of exposure to pathogens listed in Appendix D of the Cal/OSHA ATD Standard.

Group	Pathogens reasonably anticipated to be present (Appendix D)	Biosafety Level for lab procedures
OLAR	<i>Chlamydia psittaci</i> , HIV, other zoonoses	OLAR containment SOPs, ABSL2
Lab working with	<i>Chlamydia psittaci</i> (bird colony)	OLAR containment SOPs
Lab working with	<i>Chlamydia trachomatis</i> , <i>Neisseria gonorrhoea</i> , SARS-CoV-2, HIV	BSL2 with BSL3 practices, including respiratory protection
Lab working with	<i>Legionella pneumophila</i> (attenuated), <i>Helicobacter pylori</i> , <i>Mycobacterium tuberculosis</i> (attenuated), <i>Mycoplasma pneumoniae</i> , <i>Salmonella</i> Typhimurium	BSL2
Lab working with	HIV	BSL2 w/BSL3 practices
Lab working with	<i>Salmonella</i> spp. (high splash risk)	BSL2

B. EXPOSURE DETERMINATION FOR SUPPORT GROUPS

Risk assessment and exposure determination for employees within support groups is performed by their Supervisor or by the Department Head with the assistance of EHS personnel and/or the BSO.

The following is a list of job classifications in which employees have a potential for occupational exposure to aerosol transmissible diseases. Included is a list of tasks and procedures in which occupational exposure may occur for these individuals.

Student Wellness Services has been identified as a Referring employer, which is an employer that operates a facility, service, or operation in which there is occupational exposure and which refers ATD cases and suspected cases to other facilities. Referring facilities, services and operations **do not provide** medical diagnosis, treatment, transport, housing, isolation, or management to persons requiring airborne infection isolation as defined in Appendix A of the Cal/OSHA ATD Standard.

Job Title	Department	Task/Procedures
Special Response Officers (SRO)	Facilities – Security	Provide first aid to campus personnel and coordinate emergency response on campus*
Physician, Registered Nurse, Licensed Vocational Nurse, Nurse Practitioner, Physician Assistant, Medical Assistant	Caltech Student Wellness Services**	Primary medical screening for Caltech students, point-of-care screening, and COVID surveillance testing on campus (sample collection)
Caltech COVID Surveillance Lab personnel	CCSL	PCR testing on human saliva for COVID detection

*SRO's do not transport patients suspected of having been exposed to ATD's, but will coordinate paramedic medical assistance.

**Caltech Student Wellness Services is operating as a Referring Employer under a dedicated and specific Infection Control Program that also includes a Bloodborne Pathogens Exposure Control Plan and dedicated practices to reduce exposure to ATDs, specifically designed for their clinical operation. For more information on this program contact the SWS Medical Director.

NOTE: To date, we have not identified any high-hazard procedures, as defined by the Cal/OSHA ATD Standard, performed by employees in the support groups.

CHAPTER IV: METHODS OF IMPLEMENTATION AND CONTROL

A. ENGINEERING CONTROLS, WORK PRACTICES, AND PPE

Work practice controls and engineering controls are used to prevent or minimize exposure to aerosol transmissible pathogens. Controls specific to research activities are described in the [Institute Biosafety Manual](#) in addition to lab-specific SOPs.

For specialized and specific activities (e.g., Caltech COVID surveillance testing site operation), detailed SOPs have been developed and implemented.

The general work practices and engineering controls used are listed below.

1. Work Practices

- Hand washing
 - Personnel must wash their hands immediately or as soon as possible after working with or being potentially exposed to aerosol transmissible infectious materials.
- Eating, drinking, applying cosmetics or lip balm, smoking, or handling contact lenses is strictly prohibited in clinical areas for all personnel; this includes the Caltech COVID surveillance testing site.

- Storage of food for human consumption in clinic or laboratory refrigerators, including cold rooms, is not permitted.
- Personal items storage is prohibited in areas where potentially infectious materials are present.
- Procedures involving potentially infectious materials should only be conducted by properly trained personnel and in a manner which minimizes splashing, spraying, aerosolizing, and/or generation of droplets of potentially infectious materials.
- Specimens potentially containing infectious materials are to be placed in leakproof primary containers during collection, handling, processing, and storage. For transport, proper labelling, absorbent material, and a secondary leak-proof container shall be added.
- Equipment must be decontaminated before and after use with the appropriate disinfectant.
- High-touch surfaces are to be sanitized frequently using appropriate disinfectant.
- The use of needles, syringes, razor blades, and other sharps is to be minimized whenever possible. After use, syringe-needle units, razor blades and other sharps must be disposed in a dedicated sharps container, at the point of use, without removing, bending, or recapping the needles.

2. Engineering Controls

When convenient or appropriate, the use of sharps should be eliminated or minimized. If sharps have to be used, the following precautions will be implemented:

- Needles and other sharps will not be bent, recapped, removed, sheared, or purposely broken.
 - Needles will never be recapped using two hands. If a needle must absolutely be recapped, a one-handed method or a mechanical device, e.g., forceps or hemostats, will be used.
- Contaminated sharps must be placed in puncture-resistant sharps containers that are labeled with the biohazard sign.
 - Never overfill biohazardous sharps containers. When the container is 2/3 full as indicated by the “full line” on the container, close it, and [open a ticket](#) with the EHS office for pickup using the Facilities Work Request Customer Portal ([Caltech Access](#) – Self Service).
- Sharps with engineered sharps injury protection should be used when working with human material unless engineered sharps injury protection is not available.
 - Note: To determine if there is a viable device with engineered sharps injury protection available, a minimum of two vendors must be researched to determine market availability.
- Blades and other cutting tools should be engineered with safe and self-retracting blades whenever possible.

Caltech identifies the need for changes in engineering controls and work practices through regular EHS assessments and inspections. New procedures or products are evaluated by EHS Safety Engineers and the BSO.

For medical personnel (nurses and medical assistants) at Student Wellness Services, changes in engineering controls and equipment are assessed under their Infection Control Program.

3. Personal Protective Equipment (PPE)

PPE is provided to all Caltech employees at the appropriate size and at no cost to them. Training in the use of the appropriate PPE for specific tasks or procedures is provided by their Supervisors, by the EHS Office, or by the BSO, depending on the task at hand and the training requirement.

The types of PPE available to employees identified for risk of exposure to ATDs are:

- Nitrile gloves
- Latex gloves
- Safety glasses
- Face shields
- Face masks
- N95 respirators
- Lab coats

- Disposable protective gowns

Each research laboratory is responsible for providing PPE to their employees. PPE is located at Student Wellness Services for SWS staff or at the Security Office for SROs. PPE is also available at the Caltech COVID surveillance testing/vaccine site.

All employees using PPE must observe the following precautions:

- Get appropriate training on the donning and doffing of specific PPE.
- Wear appropriate gloves when it is reasonably anticipated that there may be hand contact with potentially infectious material and when handling or touching contaminated or potentially contaminated items or surfaces.
 - Never wash or decontaminate disposable gloves for reuse—nitrile and latex gloves are one-time use only.
- Wear appropriate respiratory and face/eye protection when splashes, sprays, splatters, or droplets of aerosol transmissible infectious material is handled or when interacting with a person likely to shed aerosol transmissible infectious material.
- Remove PPE immediately after it becomes contaminated and before leaving the work area.
 - Visibly contaminated PPE should be discarded in biohazard/biomedical red bin and red bag waste containers. For waste practices, see Caltech's [Waste Management Program](#).
- Always wash hands immediately or as soon as feasible after removing gloves and other PPE.

B. RESPIRATORY PROTECTION

Caltech uses engineering controls and work practice controls to reduce employee exposure to aerosol transmissible pathogens. However, when those controls are not sufficient (e.g., interaction with symptomatic patients or positive patients, or collection and manipulation of surveillance testing samples), Caltech also provides respiratory protection to employees. In some cases, an N95 respirator is required.

Employees identified for risk of exposure to infectious diseases that spread by inhalable particles and droplets are enrolled in the [Caltech Respiratory Protection Program](#) that meets the requirements of [Title 8 CCR 5144](#), including use, care, storage, and training procedures.

Caltech provides employees with access to medical evaluation by using a Respirator Medical Evaluation Questionnaire, which is confidentially reviewed by a contracted occupational health care provider.

Caltech conducts or arranges for respirator fit testing for employees before they are required to wear a respirator. An employee's fit test is performed using the same size, make, model, and style of respirator that the employee would actually wear in accordance with the [Caltech Respiratory Protection Program](#).

Caltech provides all employees required to wear a respirator with training on the following topics:

- Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator.
- What the limitations and capabilities of the respirator are.
- How to inspect, put on and remove, use, and check the seals of the respirator.
- What the procedures are for maintenance and storage of the respirator (when not disposable).
- How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators.

Training is provided to employees when they are initially required to wear a respirator and annually thereafter. Retraining is conducted if changes in the workplace or the type of respirator render previous training obsolete.

C. WASTE MANAGEMENT and HOUSEKEEPING

Regulated waste is to be placed in containers that are closable, constructed to contain all contents and prevent leakage, appropriately labeled and/or color-coded, and closed prior to removal to prevent spillage or protrusion of contents during handling.

- Solid waste likely to contain communicable or aerosol transmissible pathogens is placed in a red bin lined with red bags that are labeled with the universal biohazard symbol and the ASTM markings required by California Department of Public Health. These containers should not be used for sharps or other materials that can easily puncture the plastic liner.
- Sharps (needles and non-needle objects that could readily puncture or cut the skin of an individual when encountered) are discarded in dedicated biohazard sharps containers, which are closeable, puncture-resistant, and leakproof. Each department is responsible for supplying appropriate sharps containers.

All contaminated items are to be discarded immediately or as soon as possible in their appropriate containers at the point of use.

Containers (bins and pans) are to be cleaned and decontaminated as soon as feasible after visible contamination. A solution of 10% bleach is an appropriate disinfectant for surfaces and containers in a research laboratory setting. Clinical settings can also use EPA-registered disinfectants.

Work practices should include regular, beginning of the day, and end of the day surface decontamination for clinical areas. Appropriate disinfectants include a solution of 10% bleach, accelerated hydrogen peroxide solution, or any E-list (Mtb, HIV, HepB) or N-list (SARS-CoV-2) EPA-registered disinfectant.

D. SOURCE CONTROL MEASURES

At SWS and other clinical settings or during field response by the SROs, source control measures are mostly directed toward limiting the shedding of infectious material from patients. All patients at SWS are prompted to use proper cough/sneeze etiquette as described by the CDC. In circumstances where an infectious ATD is suspected, patients will be asked to wear a face mask and are isolated from others.

In case of a community widespread event involving known or novel pathogens expected to be transmissible by aerosol, Caltech is likely to institute a face covering/mask mandate for all its employees and visitors to limit shedding of infectious material.

All clinical sites (permanent and temporary) rely on signage and verbal cues to instruct patient behavior.

Infectious source material such as specimens or waste are controlled by applying primary and secondary containment and proper labeling.

The following labeling methods are used at Caltech:

- Waste containers (red bin and sharps containers) have all visible sides marked with a biohazard label.
- Labeling methods for SWS are described in detail in their Infection Control Plan.

EHS is responsible for ensuring that warning labels are affixed and/or red bags are used as required for regulated waste. Employees are to notify EHS (626-395-6727 or x6727) if they discover regulated waste containers, refrigerators containing communicable or aerosol transmissible infectious material, contaminated equipment, etc. without the proper labels or liners.

CHAPTER V: VACCINATIONS

When vaccines targeting specific aerosol transmissible pathogens are available and authorized for use in the US, Caltech will deploy all possible efforts to make these vaccinations available to its employees. Employees at higher risk of exposure are prioritized for distribution of the vaccine. Vaccination is encouraged unless 1) documentation exists that the employee has previously received the vaccination, 2) antibody testing reveals that the employee is immune, or 3) medical evaluation shows that vaccination is contraindicated.

Vaccinations currently available at Caltech:

- Yearly Seasonal Influenza vaccination – coordinated and deployed by Caltech HR department.
- Measles vaccination – required for laboratory and OLAR personnel working with NHPs.
- COVID-19 vaccination – available to Caltech employees in accordance with State and local regulations.
- Groups more likely to interact with human patients and populations living in on-campus residences (SWS staff and SROs) are offered all vaccines listed in [Appendix E of the Cal/OSHA ATD Standard](#) (MMR, Tdap, Varicella, Influenza) and the COVID-19 vaccine. In addition, yearly Tb testing is offered and recommended.

If an employee declines the vaccination, the employee must sign a declination form. Employees who decline may request and obtain the vaccination at a later date during their employment and still at no cost. Documentation of refusal of the vaccination is kept on file at the EHS Office or with SWS.

Vaccination records are kept as confidential patient information under HIPAA regulations by a Caltech-contracted occupational medical provider.

CHAPTER VI: POST-EXPOSURE MANAGEMENT

Caltech operates under an [Injury and Illness Prevention Program](#), and the EHS Office conducts root cause analysis for and follows up on incidents and accidents in conjunction with all necessary reporting and follow-up requirements.

Caltech ensures that the health care provider responsible for the occupational health program for employees is properly informed about research and support activities taking place at Caltech as they relate to potential ATD exposure, vaccination programs, post-exposure evaluation, and follow up.

A. POST-EXPOSURE RESPONSE

Personnel accidentally exposed via splash or inhalation of particles and droplets of an infectious agent should immediately receive or self-perform appropriate first aid. Personnel are trained on the following first-aid procedures before seeking medical attention:

In case of spill of hazardous material: warn others and immediately exit the area.

1. For a Splash in the Eye/Face

- Immediately flush the eye with temperate water from the nearest eyewash station (tested monthly) for 15 minutes. If an eyewash station is not available, use temperate water from the faucet or an emergency eye saline solution for 15 minutes.
- Hold the eyelid open to ensure effective rinsing.

2. For Contamination on the Body

- Remove contaminated clothing, shoes, jewelry, etc.
- Immediately flood exposed skin with water and wash with soap and water. If a safety shower is not available, use a faucet.

B. OBTAINING MEDICAL ATTENTION AND REPORTING INSTRUCTIONS

Immediately following first-aid procedures, the exposed individual will be advised to seek medical attention for the determination of available treatment and follow-up by an Occupational Health Care Physician, adhering to the following procedure:

Call security at x5000 or 626-395-5000 and indicate the nature of the incident. Security will call paramedics if necessary and if employee is unable to drive themselves to the clinic.

Occupational Health Clinics

Report to one of the following Occupational Health Clinics contracted by Caltech:

Monday–Friday:

8:00 a.m.–5:00 p.m.: **Concentra Urgent Care**—9350 Flair Dr., Unit 102, El Monte 91731;
phone: 626-407-0300

5:00 p.m.–8:00 a.m.: **Huntington Memorial Hospital**—711 S. Fairmount Ave., Pasadena 91105;
phone: 626-397-5000

Weekends:

Huntington Memorial Hospital (address/phone above)

In addition, all injuries, accidents, and exposures are to be reported to the employee's Supervisor and the Caltech EHS Office at 626-395-6727 or x6727 using the [Supervisor's Injury Investigation Report](#) with the original provided to the Disability & Leave Administration Unit at Mail Code 170-84 within three working days of the incident.

Research laboratories that work with aerosol transmissible pathogens have lab-specific biosafety binders that ensure the details of the material is properly communicated, when known, to the Occupational Health Practitioner team.

C. PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

EHS, the BSO, or the Medical Director for SWS will review the circumstances of all exposure incidents to determine:

- Engineering controls in use at the time.
- Work practices followed.
- Description of the device used (type/brand), if applicable.
- PPE or protective clothing used at the time.
- Location of the incident.
- Procedure being performed when incident occurred.
- Employee's training.

CHAPTER VII: EMPLOYEE TRAINING

All Caltech employees who have potential occupational exposure to ATDs receive initial and annual refresher training conducted by the BSO or designated EHS Safety Engineer (in person or online).

Employees of SWS are trained by the Medical Director for the Center.

All Caltech employees who have occupational exposure to ATDs participate in a training program that includes the following:

- The Cal/OSHA ATD regulatory requirement and the contents of the Standard;
- How to access the ATD ECP and other relevant documents (Biosafety Manual and OLAR SOPs);
- General ATD signs and symptoms and which ATDs require further medical evaluation;
- Modes of transmission for ATDs and applicable source control procedures;
- Methods for recognizing tasks and other activities that have a potential to lead to occupational exposure to ATDs;
- The use and limitations of engineering controls, work practices, and decontamination methods;
- The basis for PPE selection;
- The types, uses, limitation, removal, handling, decontamination, and disposal of PPE;
- Vaccine(s) that are available against ATDs, including information on efficacy, safety, methods of

administration, the benefits of being vaccinated, and that the vaccine(s) will be offered free of charge;

- Actions to take and persons to contact in an emergency involving aerosol transmissible pathogens;
- Procedures to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow up that will be made available;
- Post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident; and
- An opportunity for interactive questions and answers with the person conducting the training session.

Training materials are available at the EHS Office or at Student Wellness Services.

CHAPTER VIII: RECORD KEEPING

A. TRAINING RECORDS

Training records are documented for each employee upon completion of training. This documentation is kept in the EHS Office or at SWS per the [Institute's Records Retention Schedule](#) e.g. for at least five years after termination of employment or the separation of a student from Caltech.

The training records include:

- The date of training
- The name of the course (ATD)
- Completion status (attended/not attended)
- The source of the training (online or Instructor name)
- The name, Caltech ID number, and Division/Department of the person attending the training

EHS employee training records are provided upon request to the employee or the employee's authorized representative within 15 working days of said request. Requests should be addressed to the EHS Office at safety.training@caltech.edu.

B. MEDICAL RECORDS

Medical records are maintained for each employee with occupational exposure in accordance with The California Code of Regulations, § 3204 "[Access to Employee Exposure and Medical Records](#)." Caltech-contracted occupational health care providers are responsible for maintenance of requisite medical records. These confidential records are kept for at minimum the duration of employment plus 30 years.

Employee medical records are provided upon request to the employee or to anyone having written consent from the employee within 15 working days. Such requests should be sent to the Caltech-contracted occupational health care provider directly.

C. OSHA RECORDKEEPING

Exposure incidents require completion of a [Supervisor's Injury Investigation Report](#). Once completed, email the form to safety@caltech.edu then return the original completed form to the Disability & Leave Administration Unit at Mail Code 170-84 within three working days of the incident. All recorded incidents include at minimum:

- Name of injured
- Location of injury
- Date of injury
- Witness(es) to injury
- Department/work area where injury occurred
- Description/explanation of how injury occurred

CHAPTER IX: SURGE PROCEDURES

Caltech does not provide services in surge conditions and is not designated to provide services to persons who have been contaminated as the result of a release of a biological agent, as described in the [Cal/OSHA ATD Standard](#). Under surge conditions, most Caltech employees will be asked to follow local and State guidance and not report to campus. Nonetheless, the Caltech Emergency Preparedness Team maintains and implements plans to ensure that work practices, decontamination, and appropriate personal protective equipment and respiratory protection are sufficiently stocked to protect the workforce who still would be reporting on campus during such events. Emergency preparedness procedures include how respiratory and personal protective equipment will be stockpiled, accessed, or procured and how the facility or operation will interact with the local and regional emergency plan.

* * *