ACCIDENT AND ILLNESS PREVENTION PROGRAM

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West Chester University
Environmental Health and Safety
www.wcupa.edu/ehs

West Chester University

Accident and Illness Prevention Program

Introduction

The purpose of the Accident and Illness Prevention Program (AIPP) is to ensure policies and programs are in place to protect the entire West Chester University (WCU) community from health and safety hazards and prevent injuries and illnesses from occurring. The AIPP is reviewed and evaluated annually as part of a process of continuous improvement. Annual goals are established based on the AIPP evaluation and Workers' Compensation data. The AIPP applies to all WCU employees. As a self-insured employer, WCU is required to maintain an Accident and Illness Prevention Program.

West Chester University Health and Safety Policy

Purpose and Scope

The purpose of this policy is to establish responsibilities and authority for health safety and environmental compliance. This policy applies to all West Chester University employees and students.

Policy Statement

West Chester University is committed to providing a safe and healthful environment for all faculty, staff, students, and the surrounding community. This is achieved through the implementation of comprehensive environmental, health and safety programs and policies focused on reducing risks to people and the environment and ensuring compliance with applicable laws and regulations.

Policy Framework and Procedures

Environmental Health and Safety Authority

The Environmental Health and Safety Department (EHS) has the responsibility for developing and administering all environmental, health, and safety programs and policies. In this role, EHS has the authority to:

- Survey and monitor all areas of the campus to assess environmental, health, and safety hazards and to assign corrective actions.
- Immediately suspend or restrict any operation that presents a serious and immediate hazard to the health, safety, or life of campus personnel, the public, or the environment.

University Safety Committee

West Chester University has established a Safety Committee comprised of a cross representation of the university community. The Safety Committee serves as a liaison between campus constituents, unions, and EHS to address safety concerns and provide feedback and recommendations to EHS regarding programs and procedures.

Responsibilities

The implementation of environmental, health and safety programs and policies is the shared responsibility of the entire university community:

- University Leadership
  - Communicate that safety is a priority.
  - Provide appropriate financial and organizational support to assure operations are conducted safely and in compliance with applicable environmental, health, and safety laws and regulations.
- Department Heads
  - Promote a culture that supports reporting safety concerns and suggestions for improvement without fear of reprisal.
  - Ensure managers and supervisors understand their responsibilities for safety and are given the knowledge and tools they need to fulfill those responsibilities.
  - Committing resources for correction of known health and safety deficiencies.
- Managers and Supervisors
  - Promote a positive safety culture by leading by example and providing an environment that encourages employees to bring forward safety concerns and suggestions.
  - Be knowledgeable of applicable safety policies, programs, and rules.
  - Be knowledgeable of their responsibilities for implementing and enforcing safety policies, programs, and rules.
  - Provide or disseminate information regarding hazards their employees may encounter in their job or work area, and ensure employees are trained in how to perform their jobs safely, including appropriate EHS training and on-the-job training.
  - Monitor safety and health conditions within their work area, and report hazards to EHS.
  - Provide the necessary personal protective equipment or other safety equipment and ensure it is being used and maintained appropriately.
  - Take prompt corrective action when unsafe conditions, practices, or equipment are reported or observed.
  - Report all incidents, accidents, and near misses to EHS, and participate in incident investigations as needed.
- Employees
  - Be familiar with and comply with established environmental, health, and safety policies, procedures, and rules.
  - Complete all applicable safety training, including EHS training and on-the-job training.
  - Conduct all work tasks and operations in accordance with safety policies and programs.
  - Report environmental, health, and safety concerns to your supervisor or EHS.
  - Immediately report all safety incidents, accidents, and near misses to your supervisor and participate in incident investigations as needed.
- Students
  - Be familiar with and comply with established environmental, health, and safety policies, procedures, and rules
  - Complete all applicable safety training, including EHS training.
  - Conduct all tasks and operations in accordance with safety policies and programs.
  - Report environmental, health, and safety concerns to your Department Head and EHS.

Designated AIPP Coordinator

Self-insured employers are required to designate one person as the AIPP Coordinator. The AIPP Coordinator is responsible for administering the AIPP; coordinating the AIPP implementation; maintaining appropriate documentation of program activities; and providing Information, as needed, to the University, the State System of Higher Education, and other appropriate persons and/or organizations concerning the AIPP. At West Chester University, the Director of Environmental Health & Safety will serve as the AIPP Program Coordinator. Currently this position is held by Gary Ludwig.

Evaluation and Goals

Measuring AIPP Effectiveness

The effectiveness of the AIPP is measured based on West Chester University's injury and illness rate:

- PASSHE requires all state system universities to use the "First Reports" method, which compares the institution's injury and illness rate with the rates published in the current edition of the *Pennsylvania Work Injuries and Illnesses*, Table 2 "Injury and Illness Rates in Selected Industries."
- Human Resources calculates this number for the Annual Report of Accident and Illness Prevention Program Status submitted to PASSHE.

Reviewing and Revising AIPP

Environmental Health and Safety (EHS) reviews the AIPP annually to ensure each element is current and applicable. AIPP elements are revised as needed when there are changes on campus, new or revised regulations, or when loss data or other metrics indicates the program elements are not effective.

AIPP Goals

EHS establishes at least one goal each year based on the AIPP evaluation and Workers' Compensation data. The goal may include:

- Development or revision of a health and safety program
- Development or revision of health and safety resources, such as training or guidance documents
  - Targeted inspections or assessments

Accident Reporting and Investigation

The goal of a comprehensive environmental, health, and safety program is to reduce the risk of accidents or exposures from occurring that can lead to injuries or illnesses. However, accidents, exposures, and near misses may still occur due to the failure of a control, improper or incomplete assessment of hazards and risks, or human error. This program establishes the responsibilities and procedures for reporting and investigating accidents, exposures, and near misses to identify the root cause(s) of an accident or near miss and identify and implement corrective actions to prevent a reoccurrence. The purpose of the investigation is to learn and improve rather than to assign blame.

This procedure applies to all accidents, exposures, and near misses that occur on the West Chester University campus.

Responsibilities

Human Resources

- Manage Workers' Compensation program.
- Notify Environmental Health and Safety of work-related injuries and illness.

Environmental Health and Safety

- Facilitate and lead investigations of accidents, exposures, and near misses and identify corrective actions to prevent recurrences.
- Track the completion of corrective actions.

Supervisors

- Assist employees with completing and submitting the Employer's Report of Occupational Injury or Disease for work-related injuries or illnesses within 24 hours of occurrence.
- Notify EHS of accidents, including injury-free events, exposures, and near misses.
- Partner with EHS to investigate accidents, exposures, and near misses and identify and implement corrective actions.

Employees

- Immediately report all accidents and near misses to the supervisor.
- Complete and submit the Employer's Report of Occupational Injury or Disease for work-related injuries or illnesses within 24 hours of occurrence.
- Participate in accident investigation process to help identify causes and corrective actions.

Procedures

Reporting Accidents, Exposures, and Near Misses

Report all accidents, including injuries and injury-free events, exposures, and near misses as follows:

Reporting Work-Related Injuries and Illnesses

- Employees must immediately report work-related injuries or illnesses to their supervisor.
- Employees and supervisors must complete and submit the Employer's Report of Occupational Injury or Disease within 24 hours.
- Human Resources notifies EHS of work-related injuries or illnesses.

Reporting Injury-Free Accidents and Near Misses

- Employees must report injury-free accidents and near misses to their supervisor within 24 hours.
- Supervisor notifies EHS of injury-free accidents and near misses.

Investigating Accidents, Exposures, and Near Misses

Accidents, including injuries and injury-free events, exposures and near misses are investigated to determine the root cause(s) and identify corrective actions to prevent recurrences. Accident investigations are conducted to learn and improve, not to assign blame. Subject matter experts will be added to the investigation team as needed.

The accident investigation process is as follows:

Step 1: Initial Response

- Secure the scene and ensure safety of personnel and community:
    - Preserve the scene of relevant conditions and physical items and record important information.
    - Take pictures of the scene. Pictures should be taken at various distances and angles.
    - Collect, identify, and store relevant physical items and data records.
    - Document key personnel/witnesses to interview.

Step 2: Form Accident Investigation Team

- An accident investigation is required for injuries that require medical treatment beyond first aid and that result in lost workdays.
- First aid injuries and near misses will be investigated if serious injuries might have occurred.
- At a minimum, the investigation team will include EHS, the supervisor, and the employee(s).
- For severe or complex accidents, a diverse team that includes subject matter experts, will be formed.
- EHS will determine the level of accident investigation.

Step 3: Conduct the Investigation

- Determine the direct and contributing causes/factors:
    - Identify physical conditions and factors that may have contributed to the accident, including weather conditions, equipment, tools, housekeeping, chemicals, etc.
    - Identify human factors that may have contributed to the accident, including training, state of mind (distracted, stressed), competing priorities (rushing), etc.
    - Identify operating and management systems that may have contributed to the accident, including policies, procedures, maintenance practices, work schedules, communication, priorities, etc.
- Determine the root cause(s) of the incident:
    - Utilize a tool, such as 5 Whys for a simple accident or a causal tree analysis for a severe or complex accident. EHS will assist in selecting appropriate root cause analysis method.

Step 4: Determine Corrective Actions and Areas for Improvement

- Identify corrective actions, individual(s) responsible for implementation, and timeline.
- Identify systems that need improvement, including communication, design, inspections, policies, procedures, maintenance, training, supervision, etc.
- EHS will track the completion of corrective actions.

Step 5: Develop and Implement Lessons Learned

- EHS will develop and communicate lessons learned as appropriate.

Definitions

Direct causes or factors are the aspects of the incident that immediately contributed to the injury or damage.

Contributing causes or factors are the symptoms, the unsafe acts or conditions that contributed to the incident.

Root causes are the underlying system or organizational related failures that lead to the unsafe acts or conditions.

A **near miss** is an occurrence in which no injury was sustained, but given a slight shift in time or position, an injury could have occurred.

References

West Chester University Workers' Compensation Policy:
https://wcupa.sharepoint.com/sites/AF/HR/Policies1/Workers%27%20Compensation%20Policy.pdf

Hazard Identification, Evaluation and Corrective Actions

Proactively identifying, evaluating, and correcting hazards to prevent accidents and injuries is a critical component in accident and injury prevention. This procedure establishes the methods used to identify and correct hazards in the workplace.
This procedure applies to all West Chester University employees.

Procedures

Health and Safety Inspections

Routine safety inspections provide an opportunity to proactively identify and correct hazards before an accident or injury occurs. Environmental Health and Safety (EHS) conducts the following routine inspections:

- Building Safety Inspections
    - Building safety inspections focus on general interior and exterior safety conditions, including housekeeping, emergency egress, storage of combustible materials, lighting, electrical safety, and slip, trip, and fall hazards.
- Fire Safety Inspections
    - Fire extinguisher inspections
    - Fire alarm inspections
    - Fire suppression system inspections
    - Commercial cooking equipment hoods
- Specific Health & Safety Inspections include such as:
    - Laboratories
    - Machine shops
    - Art rooms
    - Swimming pool maintenance areas
    - Warehouse/maintenance areas

EHS often uses inspection checklists to indicate whether each item is satisfactory or deficient. Corrective actions are identified for deficient items. Completed forms/checklists are provided to the appropriate building, department, or area manager with necessary corrective actions needed. Corrective actions must be completed within 30 days unless another timeline is specified based on risk. EHS conducts follow-up inspections confirming all corrective actions have been completed. In addition, Department designees inspect their own work areas for Health and safety hazards and involve EHS when necessary for appropriate corrective action

Accident and Injury Data

EHS reviews accident and injury data to identify opportunities for new or improved health and safety resources.

EHS develops Lessons Learned from accident and injury investigations to prevent similar accidents from occurring elsewhere on campus.

Industrial Hygiene Services

Industrial hygiene is the anticipation, recognition, evaluation, and control of chemical, biological, and physical stressors in the workplace. The Industrial Hygiene Services program establishes procedures for providing industrial hygiene (IH) services to West Chester University employees.

West Chester University, as part of its commitment to providing a safe and healthful environment for all employees, will employ industrial hygiene methods to identify potential exposure risks and implement controls to maintain exposures to chemical, biological, and physical stressors at or below established exposure limits.

Procedures

Initiation of Industrial Hygiene Services

IH surveys are conducted by Environmental Health and Safety (EHS) or a consultant hired by EHS. An IH survey may be initiated by:

- Any employee or supervisor who has a concern about potential exposure in the workplace can contact EHS through a tab on the EHS webpage, email, telephone or in person.
- Environmental Health and Safety (EHS):
  - As part of an EHS program, i.e., noise surveys conducted as part of the Hearing Conservation program
  - A concern identified by EHS during inspections, walk-throughs, material or process reviews, or other observations

IH Survey Process

An IH survey may include, as appropriate and applicable:

- Initial walk-through to identify and assess:
  - Work operations, processes, equipment, and/or materials that present an exposure concern
  - Personnel who are potentially exposed
  - Existing controls
  - Current work practices
- Initial screening with direct read instruments
- Exposure monitoring
- Corrective action recommendations
- Follow-up exposure monitoring

Exposure Limits

The Occupational Safety and Health Administration (OSHA) and the American Conference of Governmental Industrial Hygienists (ACGIH) have established exposure limits for chemicals and physical stressors, OSHA Permissible Exposure Limits (PELs) and ACGIH Threshold Limit Values (TLVs). Types of exposure limits include:

- Exposure limits for chemicals establish maximum concentrations in air that workers can be exposed to:
    - 8-hour time-weighted average (TWA) is the maximum concentration a worker can be exposed to over an 8-hour work shift
    - Short-term exposure limit (STEL) is the maximum concentration a worker can be exposed to for a short period of time, typically 15 minutes
    - Ceiling limit (C) is a concentration in air that can never be exceeded
- Exposure limits for noise establish the maximum time that workers can be exposed to certain decibel levels

Area Monitoring

Area monitoring is conducted to identify areas or tasks that may present an exposure risk to employees, to evaluate the effectiveness of controls, or to provide clearance after abatement activities. Area monitoring is not used to determine employee exposures.

Personal Monitoring

Personal monitoring is conducted to determine an employee's exposure to a chemical or physical agent for the duration of a work task or workday. Personal monitoring includes:

Noise dosimetry

- A noise dosimeter is placed near the employee's ear (i.e., collar or shoulder) for the duration of a work shift or task to determine the 8-hour TWA noise exposure
- Results are compared to established exposure limits

Chemical sampling

- Personal monitoring for chemical exposures includes active sampling (sampling pump) or passive dosimetry (badge) to determine an employee's exposure to air contaminants
    - Samples are taken near the employee's breathing zone (i.e., collar or shoulder) for the duration of a work shift or task to determine the 8-hour TWA concentration
    - A 15-minute sample may be taken when there is a STEL or ceiling limit
    - Samples are analyzed by an AIHA accredited laboratory
- Results are compared to established exposure limits

Exposure Monitoring Results

Results from personal exposure monitoring are sent to the employee and the employee's supervisor. When results indicate exposures about established exposure limits, EHS will assess controls, work practices, and personal protective equipment, and will identify corrective actions to reduce exposures. Follow-up exposure monitoring may be conducted to evaluate the effectiveness of the corrective actions.

New Employee Health and Safety Training Outline

New Employee Orientation

New employee orientation will include the following:

- Safety policy statement
- Introduction to EHS
    - Role and responsibilities
    - How to contact EHS
- Employee involvement methods
    - Safety committees

- How to report a safety concern or suggest improvements
    - Supervisor
    - EHS
- How to report an accident, injury, illness, and near miss
    - Workers' Compensation
    - Supervisor
    - EHS
- Accident investigation process
    - Purpose to identify cause(s) and correct/improve, not to blame
- How to seek medical treatment
    - First aid
    - Workers' Compensation
    - Occupational health examinations/consultations
- How to respond to emergencies

Occupational Health and Medical Surveillance

Purpose and Scope

The Occupational Health and Medical Surveillance program establishes procedures for providing employees who have the potential for occupationally related stressors or illnesses with medical consultation and/or services. This includes employees who:

- Wear a respirator as part of their job
- Are exposed to noise at an 8-hour time-weighted average of 85 decibels or greater
- Work with laboratory animals
- Work with human blood, tissue, cells, cell lines, or other potentially infectious biological agents
- Perform asbestos abatement activities

This program does not apply to the treatment of work-related injuries, which is covered under Workers' Compensation, and it does not apply to work-related mental stress, which is covered under the State Employee Assistance Program (SEAP).

Procedures

Medical Consultations/Services

Medical consultations and/or services provided as part of the Occupational Health and Medical Surveillance Program must:

- Be provided free to affected employees
    - Medical consultations/services are not submitted to employee's insurance
    - Employee's department is responsible for payment
- Be offered during the workday at a time convenient for the employee
- Maintain confidentiality of employee's medical records and health status

Occupational Medicine Provider

Medical consultations and/or services for West Chester University employees are provided by:

Occupational Health Center
915 Old Fern Hill Road
Building A, Suite 3

West Chester, PA 19380
(610) 738-2450

Audiometric testing services are provided by:

West Chester University Speech and Hearing Clinic
201 Carter Drive, Suite 400
West Chester, PA 19383
(610) 436-3402

Recordkeeping

Medical records are maintained by the occupational medicine provider. Medical records include:

- Medical questionnaires and histories
- Results of medical examinations and laboratory tests
- Medical opinions, diagnoses, progress notes, and recommendations
- Treatments and prescriptions
- Employee medical complaints

Medical records must be provided to employees at their request.
Environmental Health and Safety (EHS) maintains the following records:

- Respirator clearance letters
- Audiometric test results
- Hepatitis B vaccination declination forms

Respirator Clearance

Employees who wear a respirator as part of their job must be evaluated by a physician or licensed health-care provider (PLHCP) to determine they are medically fit to wear the respirator. This includes employees required to wear N95s, tight-fitting half and full-face respirators, and loose-fitting powered air-purifying respirators (PAPRs).

- A medical evaluation is provided prior to being fit-tested, and if there are any changes to the employees' health status or working conditions that may affect their ability to wear a respirator.
- The medical evaluation will involve, at a minimum, the review of the Respiratory Medical Evaluation Questionnaire by a PLHCP.
- The medical evaluation may include a limited physical examination, baseline laboratory testing, a pulmonary function test, a chest x-ray, and/or other medical tests as determined by the PLHCP based on the medical history provided.

Audiometric Testing

Employees exposed to an 8-hour time-weighted average (TWA) of 85 decibels (dB) or greater must receive audiometric testing to ensure the noise exposure is not adversely affecting their hearing.

- Routine audiometric testing, which includes a baseline and annual audiograms thereafter.
- Additional audiometric testing as determined by the audiologist or PLHCP in the event of a standard threshold shift (STS).

Animal Worker Occupational Health and Safety Program

All employees who have contact with animals used in research or teaching must be enrolled in a medical surveillance program to evaluate their potential health risks from allergens and zoonoses.

- The medical evaluation will involve, at a minimum, the review of the Animal Handler Medical Questionnaire by a PLHCP.

- The medical evaluation may include a limited physical examination, vaccinations, and/or other tests as determined by the PLHCP based on the medical history provided and the type of animal contact.
- See Animal Research Safety Program for more information.

Medical Surveillance for Work with Biological Materials

Medical surveillance for work with biological materials is specific to the type of material or agent.

- Employees with exposure to human blood, tissue, cells, or cell lines must be offered a Hepatitis B vaccine.
- The need for inclusion in the medical surveillance program for work with biological agents will be determined through the risk assessment for the specific agent, and may include pre-work consultation, vaccinations, and post-exposure surveillance as appropriate.

Employee Involvement in the AIPP

Employees are encouraged to take an active role in environmental, health and safety issues. Some of the ways this may be accomplished is by participating on the health and safety committee as well as departmental safety related committees or teams, assisting in and/or attending mandatory and voluntary health and safety trainings; assisting with accident investigations and/or providing suggestions and/or concerns to their supervisor and EHS, and participating in wellness/health programs

University Health and Safety Committee Charter

West Chester University is committed to protecting the safety and health of our employees, students, visitors, and community members. West Chester University has established a Safety Committee to assist the University in meeting this commitment.

Purpose

The West Chester University Health and Safety Committee is comprised of representation from a broad range of campus constituencies and reports to the Vice President for Administration and Finance. The Health and Safety Committee serves in an advisory role to assist the University in addressing hazards on campus that can cause injury, illness, harm to the environment, or damage to campus facilities and equipment.

The Health and Safety Committee provides an opportunity for employee participation in shaping the University's environmental health and safety program and meets the requirements in the collective bargaining agreements for joint health and safety committees.

Safety Committee Functions

- Serve as a liaison between campus constituents, unions, and Environmental Health and Safety (EHS) to address safety concerns and provide feedback on EHS programs and procedures.
- Be available to constituents who may have safety related questions, concerns, or suggestions.

- Review data relating to injury and illness reports and fire and safety inspections. Assist in identifying trends and corrective actions. Review and/or recommend new or revised EHS programs and procedures to address hazards and/or regulatory changes.
- Participate in incident investigations and pre-operational reviews as appropriate.
- Promote educational efforts focused on accident and injury prevention.

Membership

- The voting membership of the Committee shall consist of 15 members, distributed as follows:
    - One representative from the Environmental Health & Safety Department
    - One management representative from the Facilities Division
    - One representative from Residence Life
    - One representative from the Personnel Department
    - Three non-instructional employees selected by AFSCME
    - One representative from Public Safety
    - Two faculty representatives selected by APSCUF
    - One representative from SCUPA
    - Student Health Services Director
    - One representative from the Athletics Department
    - One undergraduate student selected by SGA
    - One graduate student selected by GSA
- Instructional, non-instructional and SCUPA representatives shall serve for a term of two years.
- Student representatives shall serve for a term of one year.
- Representatives can serve for more than one term.
- All terms of office shall commence on September 1 and terminate on August 31.

Procedures

- The Chair of the Committee shall be appointed by the Vice President for Administration and Finance. The Chair will have the responsibility for calling all meetings, preparing the agenda, preparing minutes, and presiding over the conduct of all appropriate business.
- Regular meetings of the Committee shall be held at least quarterly. Special meetings may be called as needed by the Vice President for Administration and Finance, by the Chair or at the request of three members of the Committee.
- A quorum of eight (8) members shall be necessary to transact business. A valid vote is constituted by a majority of the total voting membership. Under emergency situations, this quorum requirement may be suspended.
- Proxies shall be permitted.

- The Vice President for Administration and Finance shall be responsible for administrative support of the operations of the Committee.
- Each constituency has the right to have non-voting consultants or resource persons attend the meetings.
- Safety committee members shall be appointed by the union, department, or unit head.
- Health and Safety Committee agendas and minutes shall be disseminated to the Safety Committee for approval and shall be maintained by EHS. Safety Committee minutes shall be made available to West Chester University constituents upon their request.

Employee AIPP Suggestions and Communication

WCU has several methods to ensure effective health and safety suggestions and communication with employees. Some of these methods include providing training for new employees and providing specific training for job assignments; easy to navigate and updated EHS website that has a mechanism for employee feedback and a diverse listing of all programs, documents, and important seasonal topics; communication from direct supervisors to employees ensuring proper health and safety protocols are followed; and digital PSA's that show on electronic message screens throughout the campus.

Emergency Action Plan

https://www.wcupa.edu/dps/emergencyManagement/documents/EmergencyResponseGuideline2020.pdf