

University of Southern California Environmental Health and Safety Policies

Issued by: Dennis F. Dougherty

Senior Vice President for Administration

Date issued: March 15, 2004

USC Environmental Health and Safety Policies

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INTRODUCTION

The university Environmental Health and Safety Policies (Safety Policies) should be used in conjunction with the USC Safety Manual and in accordance with university safety programs.

<u>Details for implementation and further information are found in the USC Safety Manual and on the Environmental Health and Safety Web site at:</u>

http://srm.usc.edu/Safety_Dept_Web/main/index.htm

Web addresses for online safety information and forms are provided throughout these policies. Printed copies of the Safety Manual are available from Career and Protective Services by calling (213) 740-6448 on the University Park campus or (323) 442-2200 on the Health Sciences campus.

Safety-Related Contact Information

Environmental Health and Safety	(213) 740-6448
Stonier Hall (STO), Room 101	
837 Downey Way, Los Angeles, California 90089-1143	
Laboratory Safety	(323) 442-2200
Center for Health Professions (CHP), Room 148	
1540 Alcazar Street, Los Angeles, California 90033-9005	
Risk Management, Workers' Compensation, and Disability	(213) 740-6199
Hazel and Stanley Hall (HSH), Room 300	
851 Downey Way, Los Angeles, California 90089-1058	
Emergency Planning	(213) 740-6197
Stonier Hall (STO), Room 101	
837 Downey Way, Los Angeles, California 90089-1143	

STATEMENT OF SAFETY PRINCIPLES

It is the policy of the University of Southern California to carry out all activities in a safe manner. This means that all members of the university community take every reasonable measure to protect the safety and health of faculty, staff, students and visitors, to protect the environment, and to minimize risks to USC facilities and assets. All activities at the University of Southern California should be conducted in accordance with the following guidelines:

- 1. Each person who manages a project or activity or area is responsible for ensuring the safety of such activity or project. This responsibility cannot be delegated to others.
- 2. An activity or project is not considered safe unless it is in compliance with all applicable safety, health and environmental regulations and USC policies and procedures.
- 3. Persons who manage a project or activity or area, and those responsible for approving the budget for the project or activity or area, are responsible for ensuring that budget requests include adequate funding to meet safety requirements. These persons are responsible for providing adequate budget to achieve and maintain safety compliance for their activities, projects and facilities.
- 4. Each individual is expected to follow all safety requirements, and no person is expected to carry out any activity that does not meet all safety requirements. If there is any doubt, it is the individual's responsibility to bring his or her concerns to the attention of his or her supervisor, and if necessary, consult with Career and Protective Services so that safety requirements can be met.
- 5. Career and Protective Services will advise the university community on safety, health and environmental requirements, and will provide safety and risk management services to implement safety policies. For assistance, please call (213) 740-6448.
- 6. Any employee not complying with university safety policies will be subject to appropriate disciplinary action, up to and including termination or dismissal for cause, which for faculty will follow the procedures set out in the Faculty Handbook.

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7. For assistance with compliance issues, or to report suspected violations, contact the USC Office of Compliance Help and Hotline at (213) 740-2500.

RESPIRATORY PROTECTION

PURPOSE

University faculty, staff and students who engage in activities that may expose them to vapors, fumes or dusts in excess of regulatory limits must be provided with respiratory protection in accordance with Cal-OSHA requirements. This document establishes the University of Southern California procedures for meeting those requirements.

APPLICABLE TO

This policy applies to all university schools and departments whose employees and/or students participate in activities that require respiratory protection. This policy does not apply to the use of simple dust masks worn only to minimize nuisance dust.

POLICY

Individuals who engage in activities or enter areas where they may be exposed to vapors, fumes or dusts in excess of regulatory limits (as listed in Title 8, California Code of Regulations, GISO 5155 or other regulations) are required to wear respirators. Respirators may only be worn by individuals who have current medical approval to wear respirators and who have been trained, fit tested and authorized by Career and Protective Services.

PROCEDURES

The individual with ultimate authority on a particular project (i.e., principal investigator, department chair, supervisor, or manager) is responsible for ensuring that his or her activity complies with this policy. Information for determining which operations require use of respirators is obtainable from Material Safety Data Sheets (MSDS's), labels, regulations, industrial hygiene sampling results, and other applicable resources. Career and Protective Services staff is available at (213) 740-6448 to assist in determining which operations require respirators.

Respirator users are required to obtain medical approval prior to the use of respirators. The expense associated with this review is the responsibility of the users' department or program. This medical approval may be obtained from medical facilities approved by Career and Protective Services. A copy of the medical approval must be sent to Laboratory Safety, CHP 148, 1540 Alcazar Street, Los Angeles, CA 90033-9005. No authorization for respirator use will be issued for personnel who do not have current medical approval on file with Laboratory Safety. Prior to use of a respirator, all users are required to complete a training session and be fit-tested for a specific respirator. Please contact Professional Development at (213) 740-5885 to arrange for respiratory protection training and fit-testing.

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Page 1 of 2 Respiratory Protection USC Safety Policy # 002 The use of self-contained breathing apparatuses (SCBA's) and air-line respirators is subject to additional requirements and will be addressed by Career and Protective Services on a case-by-case basis.

For more complete guidelines pertaining to respiratory protection, please refer to the USC Respiratory Protection Program in the Industrial Hygiene section of the Environmental Health and Safety Web pages at:

http://srm.usc.edu/Safety_Dept_Web/IndustrialHygiene/respiratory/respiratory.html

A printed version of the Safety Manual is available from Career and Protective Services by calling (213) 740-6448 on the University Park campus; or (323) 442-2200 on the Health Sciences campus.

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VEHICLE / DRIVER SAFETY

PURPOSE

The purpose of this policy is to minimize the number of vehicle accidents that may cause injury; to protect the safety of USC faculty, staff and student drivers and passengers; and to prevent injury to third parties, and property damage in connection with the use of licensed university vehicles.

APPLICABLE TO

This policy applies to all individuals who are authorized to operate vehicles designated by the University as "Fleet Vehicles," including electric carts; automobiles; light load pick-up and other trucks; heavy load pick-up and other trucks; vans; trams and busses, which are for University business use only, and not for personal use.

POLICY

University departments are responsible for keeping their vehicles in safe working condition and should allow university vehicles to be driven only by employees with safe driving records as defined in this policy. Drivers are responsible for abiding by all applicable federal, state and local laws as well as university policies when driving a university vehicle.

PROCEDURES

Maintenance

Each department using university-owned vehicles is responsible for having quarterly maintenance checks performed on university vehicles and maintaining records of these checks and any maintenance problems. The Fleet Safety Committee may conduct audits of a department's maintenance records at any time.

Each employee is responsible for doing a safety check on a vehicle before using it. A safety checklist is available at the Career and Protective Services Web site at capsnet.usc.edu/ehs. Employees must immediately report unsafe conditions or hazards in vehicles to their supervisor. The vehicle should not be used until such problems are addressed and corrected.

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Accidents and Traffic Violations

Drivers are responsible for obeying state and local traffic laws and must adhere to any applicable University policies. Any Driver who violates any state or city driving law resulting in traffic or parking citation is in violation of this policy.

Employee Drivers must immediately report all accidents, moving violations, license suspensions and driving-related arrests to their department supervisor, whether or not the incident occurred while driving a University vehicle. The department must then report such incidents to Career and Protective Services.

To the extent that a department becomes aware of any accident involving a University vehicle, it should immediately report the incident to Career and Protective Services.

An Accident Form must be kept in each vehicle. In the event of an accident, the Driver MUST (1) complete an Accident Form (2) provide a copy to his or her supervisor and (3) forward it to Career and Protective Services. These forms can be obtained from Career and Protective Services. This form is available on the Career and Protective Services Web site at capsnet.usc.edu/ehs.

A Financial Responsibility Form must be kept in each vehicle as evidence of self-insurance as required by law. These forms can be obtained from Career and Protective Services.

Driver Qualifications

Drivers shall meet the following conditions:

- carry on their person a valid Driver's License of the proper class for the type of vehicle he or she is driving.
- not have any medical problems or conditions that preclude him or her from driving.
- prior to beginning employment or the assumption of any University-related driving, must not have had:
 - three or more moving violations in the previous 12 months; or
 - any suspension or revocation of license in the previous three years; or
 - any conviction for driving under the influence in the previous five years.

All existing drivers, as well as newly hired or assigned Drivers must consent to sign the DMV "Authorization for Release of Driver Record Information" form.

Individual departments may invoke stricter standards.

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Vehicle / Driver Safety Senior Vice President,

Administration
Issued: January 17, 2006

USC Safety Policy # 003

Personal Use of University-Owned Vehicles

Personal use of University-owned vehicles is prohibited, including but not limited to, any activity not directly related to University business during, before or after work, or during breaks. This includes using vehicles to drive off-campus for breakfast, lunch or dinner, or for a personal appointment of any kind.

Training

All Drivers must attend and successfully complete a four-hour National Safety Council defensive driving course given either by the USC Department of Public Safety or by the USC Office of Transportation Services as a condition of performing any University-related driving. The course must be completed within 90 days after being hired or assigned as a Driver.

All Drivers must take a refresher defensive driving course every three years.

A Driver who has an at-fault accident with a University-owned vehicle will be required to repeat the course.

Departments shall bear the cost of the Driver's attendance at training courses, and will maintain the training records.

Seat Belts

All Drivers who drive a University vehicle must wear their seat belts at all times on and off campus and must ensure that all passengers wear their seat belts.

All drivers and passengers must sit in designated seats; there is no standing or riding allowed in or on beds of vehicles.

No Alcohol or Drugs Policy

All Drivers are covered by and must comply with the University's Policy on Alcohol and Other Drugs (found in 'USC Drug-Free'), the Staff Employment Policies and Procedures, and the Faculty Handbook where applicable. Drivers covered by the Federal Highway Administration drug testing regulations will also be covered by the University of Southern California Alcohol and Drug Abuse Policy for Commercial Drivers. Drivers not covered by the Federal Highway Administration drug testing regulations will be subject to pre-employment/assignment testing and reasonable suspicion testing. Copies of the foregoing policies are attached and are available online at policies.usc.edu or from Career and Protective Services at (213) 740-6199.

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FIFTEEN-PASSENGER VANS

This section of the policy applies to 15-passenger vans either owned by USC or leased by USC faculty, staff, or student groups.

Existing 15-Passenger Vans

All existing 15-passenger vans should have their rear seats removed and the passenger load reduced to no more than 10, including the driver.

Purchase of 15-Passenger Vans

The future purchase of 15-passenger vans is prohibited. Purchases should be limited to vans with occupancy of no more than 10, including the driver.

Rental of 15-Passenger Vans

Rental of 15-passenger vans is prohibited. Rentals should be limited to vans with occupancy of no more than 10, including the driver.

Roof Racks and Towing

No van will contain roof racks or be used to tow a trailer of any kind.

Driver Training

All employees driving passenger vans should undergo special driver safety training specifically designed for this type of vehicle.

VIOLATION OF POLICY

Any Driver who violates this policy is subject to having his/her privilege to drive University vehicles suspended, and for University faculty and staff, is subject to disciplinary action up to and including termination, in accordance with university policies and procedures. For faculty, disciplinary action will follow the procedures set out in the Faculty Handbook.

Any questions or concerns regarding USC vehicle/driver safety policy and procedures should be directed to Career and Protective Services at (213) 740-6199.

Issued by: Todd R. Dickey

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Acknowledgment

University's Policy on Alcohol and Other Drugs and related sections of the Staff						
Employment Policies and Procedures, and the Faculty Handbook. I have read these policies and understand them. I understand that if I fail to follow any provisions of these policies, my privilege to drive University vehicles will be suspended, and if I am a faculty or staff member, that my employment may be terminated.						
					Driver Name (print)	Department
D: , G: ,						
Driver's Signature	Date					

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I acknowledge that I have received a copy of the USC Vehicle/Driver Safety Policy, the

SAFETY INSPECTIONS

PURPOSE

The purpose of this policy is to identify potentially unsafe conditions that may lead to personal injury and/or property damage and to ensure that the university maintains a safe working environment.

APPLICABLE TO

This policy applies to all university schools and departments.

POLICY

Self-Inspections

Deans, directors, and department heads are responsible for ensuring that periodic safety inspections of their facilities are conducted. The frequency of inspections shall be determined by hazard potential and type and frequency of injury as noted in Loss Control Reports from our insurance administrator. Standards and procedures for self-inspections are available on the USC Safety Web pages.

Career and Protective Services Inspections

Career and Protective Services shall conduct periodic inspections and shall develop specific guidelines to assist those departments that by the nature of their work, are more prone to encounter possible hazards, (e.g., research laboratories, Facilities Management Services, Hospitality Services, Housing, etc.)

Since workplace hazards frequently change, the identification and control of such hazards should not be restricted to a set schedule. Continuous monitoring is necessary to achieve the ultimate goal of a hazard-free workplace.

Other Inspections

The university is subject to inspections by outside agencies such as the Occupational Safety and Health Administration (OSHA), the Environmental Protection Agency (EPA), and the County of Los Angeles Department of Health Services. Under no circumstances should such inspections be conducted without staff from Career and Protective Services present. If you are contacted by a governmental agency in connection with a possible safety inspection or audit, you must call Career and Protective Services immediately at (213) 740-6448. In some cases, such as OSHA inspections as a result of employee complaints, employees or their representatives have the legal right to accompany the inspecting official. All employees are expected to cooperate and

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participate as necessary (as determined by Career and Protective Services) in such agency inspections.

Other inspections may include those conducted in accordance with contractual agreements and corporate compliance and auditing groups. Employees are expected to cooperate and participate as necessary in such inspections or audits, and must notify Career and Protective Services of the inspection as soon as notification is received. Under no circumstances should such inspections be conducted without staff from Career and Protective Services present.

PROCEDURES

Career and Protective Services develops guidelines for self-inspections for each type of work area (e.g., shops, offices, laboratories.) Career and Protective Services also works with individual departments, upon request, to develop specific inspection procedures and frequencies.

Vice presidents, deans, directors, and department heads should ensure that inspections are conducted in accordance with the USC Injury and Illness Prevention Program and that corrections of deficiencies are made as appropriate. Records of such inspections and corrections must be kept in the department for inspection by Career and Protective Services.

For guidelines and more information about self-inspections, please refer to the USC Injury and Illness Prevention Program, which is available online at:

http://srm.usc.edu/Safety_Dept_Web/jobsafety/injury/injury.html

A printed version of the Safety Manual is available from Career and Protective Services by calling (213) 740-6448 on the University Park campus; or (323) 442-2200 on the Health Sciences campus.

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ACCIDENT REPORTING AND INVESTIGATION

PURPOSE

The purpose of this policy is to provide and maintain for all university employees, students and visitors an environment free from hazards that might cause injury or illness; to establish responsibility, accountability and authority for implementation of the Injury and Illness Prevention Program; and to identify and remove the cause of accidents in order to prevent their recurrence.

APPLICABLE TO

This policy applies to faculty, staff, students and visitors who suffer injuries or property damage as a result of accidents at USC, and their supervisors, managers, instructors, and hosts who are obligated to report those incidents.

POLICY

All accidents resulting in injury or property damage, as well as near misses, should be reported **immediately** to Career and Protective Services by calling (213) 740-6448.

Completion of an accident investigation and the appropriate documentation is the responsibility of the principal investigator, manager or supervisor. In addition, Career and Protective Services shall investigate all accidents it considers serious, and will assist with the investigation of other accidents as appropriate and as requested.

PROCEDURES

Any employee who is injured on the job must immediately report the injury to his or her supervisor and seek medical attention as soon as possible. If the accident occurred near or oncampus during regular business hours, seek medical attention at either the Student Health Center (at the University Park Campus) or the Ambulatory Health Center, at the Doheny Eye Building (DOH) (at the Health Sciences Campus). For emergencies that occur at off-campus locations, or during weekends or after regular business hours, get medical attention at the nearest outpatient hospital. University employees should instruct the hospital to call the Workers' Compensation Department for authorization on the next working day.

The supervisor of an employee who has been injured must complete the Supervisor's Report of Injury Form and return it to the Workers' Compensation Office **within 24 hours of the injury**. The form may be downloaded from the Career and Protective Services web page:

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http://srm.usc.edu/forms/wcMenu/report.pdf

Page 1 of 2 Accident Reporting and Investigation USC Safety Policy # 005 The Workers' Compensation Office is located in Hazel and Stanley Hall, Room 300, 851 W. 36th Pl., Los Angeles, CA 90089; FAX: (213) 740-8785; Phone: (213) 740-6205. The supervisor must investigate the cause of the accident as indicated on the Supervisor's Report of Injury Form and make the necessary corrections, if applicable. Documentation for accident investigations and corrections must be retained in the department for five years.

Supervisors may contact Career and Protective Services for assistance in investigation of accidents if needed. The Workers' Compensation Office will refer all serious accidents to Safety staff for review. The Safety staff will investigate the accidents and make recommendations to prevent similar accidents from recurring.

In addition to reporting all accidents that result in injury or property damage to Risk Management, any accident that results in significant property loss or serious injury to or the death of a student and any accident to a visitor that results in injury or property loss must be reported to the USC Department of Public Safety at (213) 740-4321 on the University Park campus or to (323) 442-1000 on the Health Sciences campus.

Following investigation of accidents, Career and Protective Services will determine if appropriate corrective action has been taken to prevent recurrences of such accidents. Where indicated, Career and Protective Services will make recommendations for additional corrective action to responsible management and will follow up to ensure corrections are implemented. It is the responsibility of the department where the injury occurred to assure that corrective actions are completed.

Visitors and students should report all accidents to the Department of Public Safety by calling (213) 740-4321 on the University Park Campus; or (323) 442-1000 on the Health Sciences Campus.

For more complete guidelines pertaining to accident investigation and reporting, please refer to the USC Injury and Illness Prevention Program, which is available online at:

http://srm.usc.edu/Safety_Dept_Web/Training/AcidentInveg.html

A printed version of the Safety Manual is available from Career and Protective Services by calling (213) 740-6448 on the University Park campus; or (323) 442-2200 on the Health Sciences campus.

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CHEMICAL INVENTORY PROGRAM

PURPOSE

The purpose of this policy is to produce an inventory of hazardous chemicals within the university in order to comply with federal, state and local Community Right-to-Know laws. These laws provide local emergency officials and members of the community at large with the right to know what hazardous chemicals are present within the university. A copy of the hazardous chemical inventory is periodically sent to local emergency officials in compliance with these laws.

APPLICABLE TO

This policy applies to faculty, staff and students who use hazardous chemicals.

POLICY

Each principal investigator, supervisor, department head or manager shall furnish a complete inventory of all chemicals to Career and Protective Services annually. Career and Protective Services shall forward all required reports of chemical inventories to the Los Angeles Fire Department and to other regulatory agencies, as appropriate.

PROCEDURES

When chemicals are used in a facility without prior chemical inventory, or when chemical usage substantially changes, the principal investigator, manager or supervisor must generate a new inventory and submit it online at:

http://srm.usc.edu.rmcsapps/

Annually, Career and Protective Services will request that existing chemical inventories be updated in the online Chemical Inventory program.

For more complete guidelines pertaining to chemical inventories, please refer to the Hazardous Materials Management Program Manual and the Chemical Safety section of the Laboratory Safety chapter in the USC Safety Manual:

http://srm.usc.edu/Safety_Dept_Web/Administration/manual/manual.html

A printed copy of the Safety Manual is available from Career and Protective Services by calling (213) 740-6448 on the University Park campus or (323) 442-2200 on the Health Sciences campus.

Page 1 of 1 Chemical Inventory Program USC Safety Policy # 006

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HAZARDOUS WASTE MANAGEMENT

PURPOSE

The purpose of this policy is to protect the health and safety of university faculty, staff, students and visitors through safe handling and disposal of chemical, infectious, and radioactive wastes; to reduce the potential environmental liabilities and costs of hazardous waste disposal; and to help ensure that hazardous wastes are disposed of in accordance with all applicable regulations.

APPLICABLE TO

This policy applies to faculty, staff, students and visitors who generate chemical, biohazardous or radioactive wastes.

POLICY

Individuals who engage in activities that generate chemical, biohazardous or radioactive wastes are responsible for collecting the waste, packaging, labeling and temporarily staging it in accordance with all applicable government regulations and university procedures. Career and Protective Services will collect such wastes and dispose of them. Faculty, staff, students and visitors who engage in activities that generate chemical wastes are responsible for using waste minimization techniques, as described below, that result in either (1) the reduction of total volume or quantity of hazardous waste or (2) the reduction of toxicity of the hazardous waste, or both.

PROCEDURES

The individual with ultimate authority on a particular project or in a unit/department generating hazardous waste (i.e., principal investigators, department heads, directors, managers, supervisors) is responsible for determining which chemical, biological and radioactive wastes are potentially hazardous, and for instituting procedures for handling such wastes in accordance with all regulatory requirements. Career and Protective Services is responsible for providing general guidance on what constitutes hazardous waste, for reviewing waste disposal practices and recommending appropriate handling procedures. In every case, hazardous waste must be properly packaged and labeled, and appropriately documented. When these requirements have been completed, Career and Protective Services will remove the waste and will assume responsibility for appropriate disposal. Waste will be collected in accordance with routine schedules, or within 48 hours of any request for a special pick-up.

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Waste Minimization

Principal investigators, department heads, directors, managers, and supervisors are responsible for providing instructions in waste minimization techniques to those who use chemicals. Individuals who use chemicals shall implement waste minimization techniques such as product substitution, process modification, product segregation, chemical recycling, reclamation, neutralization or deactivation.

These techniques include:

- Substitution of a non-hazardous material for a toxic or hazardous one,
- Modifying experimental processes such as downsizing of experimental equipment or using automated techniques,
- Segregating all waste streams and accurately labeling waste containers as to their exact content.
- Collecting precious metals and metal containing solutions for reclamation,
- Procedures for deactivating hazardous waste produced in experiments,
- Rotating older chemicals out of stock areas first, and
- Training employees annually in waste minimization.

Career and Protective Services has developed guidelines for waste reduction and will assist departments and units in reviewing and developing waste minimization techniques. Usable chemical wastes and unused chemicals will be collected for reclamation, recycling and redistributing. Waste volumes will be measured annually for all generators. Generators who do not show a significant reduction in waste volume will be given additional counseling in waste minimization techniques and may incur additional costs for disposal.

In no case may hazardous chemical, biological or radioactive waste be disposed of through municipal solid waste, sanitary sewers, or industrial waste water streams without prior written approval from Career and Protective Services.

For more complete guidelines pertaining to hazardous waste management, please refer to the Hazardous Materials and Waste Management Policies and Procedures Manual, and to the online Waste Management information at:

http://srm.usc.edu/Safety_Dept_Web/labsafety/hazprogram/hazprogram.html

A printed version of the Safety Manual is available from Career and Protective Services by calling (213) 740-6448 on the University Park campus or (323) 442-2200 on the Health Sciences campus.

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CONSTRUCTION SAFETY

PURPOSE

The purpose of this policy is to ensure that construction, renovation and demolition of university buildings and facilities are performed safely and minimize potential personal injury, property damage, and liability losses.

APPLICABLE TO

This policy applies to university departments, such as Facilities Management Services and Auxiliary Services, that are involved in the planning, supervision or performance of construction, demolition and remodeling projects.

POLICY

All construction companies doing work on university property and all university departments involved in renovation or remodeling will have written safety plans that are adequate to protect the safety of people and property within the construction site and surrounding area. These safety plans must be reviewed and approved by Career and Protective Services prior to the start of work, and strictly followed by those performing the work.

PROCEDURES

Contracts

Insurance and indemnification requirements must be included in all construction contracts entered into by USC whereby the contract company provides proof of insurance deemed sufficient by Career and Protective Services and also indemnifies the university for any losses incurred by USC in connection with the project. As part of the contract, all contractors will be required to submit their safety plan to Career and Protective Services prior to commencement of the project. The contracts will also include "Guidelines for Safety," which the contractors will be required to follow. All such contracts must be signed by a university official authorized to execute university contracts (refer to the Execution of Documents policy on the university policies Web site at http://policies.usc.edu).

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Safety Plan

The contractor or university department performing the work will be required to submit a written safety plan prior to commencement of the project. This plan will be reviewed by Career and Protective Services staff. The plan should address safety issues within the construction site, such as construction materials, chemicals, fire hazards and construction procedures, as well as the impact of the construction on the surrounding area, including traffic flow, parking, street closures, utility turn-offs, pedestrian crossing, safety signs, etc. All of those items will be discussed at a pre-construction meeting and must be approved by Career and Protective Services prior to the start of construction activities. The company or department performing the work is required to follow the safety plan.

Safety Training

The Construction Managers on each site, who must be Facilities Management Services or Auxiliary Services personnel, will receive training on how to recognize safety hazards during their periodic walk-through of projects. Career and Protective Services (or outside contractors under the supervision of Career and Protective Services) will conduct the training. A checklist is available from Career and Protective Services at (213) 740-6448 for use by the Construction Manager in recognizing safety hazards.

Miscellaneous

USC Construction Managers must have access at all times to all job site minutes.

Any injuries requiring medical attention that occur on the site, regardless of who is injured or extent of injury, must be reported immediately to Career and Protective Services by calling (213) 740-6448.

Sign Off

The overall safety procedures must be signed-off by the various departments involved: Career and Protective Services; Facilities Management Services; any others as appropriate.

For more complete guidelines pertaining to construction safety, please refer to the Construction Safety information available online at:

http://srm.usc.edu/Safety_Dept_Web/construction/construction.html

A printed version of the Safety Manual is available from Career and Protective Services by calling (213) 740-6448 on the University Park campus or (323) 442-2200 on the Health Sciences campus.

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HAZARD COMMUNICATION

PURPOSE

The purpose of this policy is to ensure that faculty, staff, and students are informed about potential hazards pertaining to hazardous substances within the university and how to protect themselves, and to comply with applicable federal and state regulations.

APPLICABLE TO

This policy applies to all university schools and departments whose employees have the potential to be exposed to a hazardous material.

POLICY

Principal investigators, managers, and supervisors are responsible for providing information and training about hazards in the workplace to employees and students who engage in activities that require handling and use of hazardous biological, chemical, physical or radioactive substances. This information must be supplied through a hazard communication program that conforms to all applicable government regulations. Career and Protective Services staff is available to assist in developing written hazard communication programs and in providing the required training.

The hazards communications program must be specific to the employee and student work area(s) and must be communicated to them in writing. The written program and all related documentation shall be located in a central location readily available to employees and students, their representatives and, upon request, to Career and Protective Services staff and regulatory agencies.

PROCEDURES

Each principal investigator, manager, and supervisor must develop and maintain a written hazard communication program for utilizing hazardous substances within his or her laboratories or jurisdiction in accordance with all regulatory provisions, and must provide information and training. Employees and students must be informed about:

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- 1) any operations in their work area where hazardous substances are present;
- 2) where the complete written program can be found;
- 3) methods and observations used to detect a hazardous substance release:
- 4) physical and health hazards;
- 5) labeling requirements; and
- 6) the use of Material Safety Data Sheets (MSDS's).

Career and Protective Services will:

- 1) provide written guidelines for developing written programs, compiling MSDS's, and instituting a Hazard Communication Program;
- 2) provide training for those individuals who are responsible for giving Hazard Communication training at the departmental level; and
- 3) provide air sampling for contaminants as required by the Hazard Communication and other applicable regulations.

For more complete guidelines pertaining to hazard communication, please refer to the USC Hazard Communication Program which can be found in the USC Safety Manual:

http://srm.usc.edu/Safety_Dept_Web/Administration/manual/manual.html

and to "Hazard Communication at USC," a train-the-trainer workbook:

http://srm.usc.edu/Safety_Dept_Web/IndustrialHygiene/hazcomm/hazcomm.html

A printed version of the Safety Manual is available from Career and Protective Services by calling (213) 740-6448 on the University Park campus or (323) 442-2200 on the Health Sciences campus.

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EVENT PERMITS

PURPOSE

The purpose of this policy is to protect the university community and visitors from the dangers of fire and life safety hazards created by special events on university property that require special setups, open fires, or temporary structures, and to comply with applicable governmental regulatory requirements (e.g. the Los Angeles City Department of Building and Safety [LADBS] and the Los Angeles City fire code).

APPLICABLE TO

This policy applies to faculty, staff, students, all university-affiliated organizations and non-university organizations that hold or sponsor events on the university property.

POLICY

Prior to the event, all individuals, groups or organizations that hold or sponsor events shall present a detailed plan (to include plot plan, time lines for set up and event, and the completed LAFD Division 5 application) to Fire Safety and Emergency Planning at MC 1143. All sponsoring groups and organizations must strictly adhere to all applicable regulations and university policies.

PROCEDURES

Fire Safety and Emergency Planning will consider each application to determine the need for Fire Department and/or LADBS permitting. If it is determined that further permitting is required the Events Permitting Coordinator will assist the organizers of the event in obtaining the appropriate permits. If it is determined that no further permitting is required, then the Event Permitting Coordinator shall issue a university Event Permit event, that will include instructions for continued compliance. Fire Safety and Emergency Planning can be contacted at (213) 740-6838.

Events which may require outside permitting involve use of equipment or activities including, but not limited to, any of the following:

- Portable electrical power (trailer or tractor mounted generators, including those used in motion picture or video production)
- Stages greater than or equal to 36 inches in height or structures over 12 feet high;
- Tents or canopies that are greater than 450 square feet;
- Seating for 150 or more persons;
- Open flames; (barbeques, cooking, bonfires, etc.)
- Carnival equipment (i.e., rides, booths); or
- Pyrotechnics displays or use (i.e., fireworks, smoke bombs).

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Event Permits Senior Vice President for Administration

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USC Safety Policy # 010

INJURY AND ILLNESS PREVENTION

PURPOSE

The purpose of this policy is to provide a safe environment for faculty, staff, students and visitors; to institute safety procedures in order to minimize injuries and illnesses; and to ensure the implementation of an effective, written Injury and Illness Prevention Program in accordance with Cal-OSHA requirements.

APPLICABLE TO

This policy applies to all university departments and schools.

POLICY

All accidents must be reported **immediately** to Career and Protective Services by calling (213) 740-6448.

Each director, department head and manager shall establish, implement and maintain an effective injury and illness prevention program for his or her area of responsibility. The injury and illness prevention program will include the following major elements: a system for identifying and evaluating workplace hazards, including scheduled periodic inspections to identify unsafe conditions and work practices; methods and procedures for correcting unsafe or unhealthy conditions and work practices in a timely manner; an occupational health and safety training program designed to instruct employees in general safe and healthy work practices and to provide specific instruction with respect to hazards specific to each employee's job assignment; a procedure for investigating accidents and injuries to determine the cause(s) of the incident; a system for communicating with employees on occupational health and safety matters, including provisions designed to encourage employees to inform the university of hazards in the workplace without fear of reprisal; and a system for ensuring that employees comply with safe and healthy work practices.

The injury and illness prevention program should be specific to each department and should be in writing. The written program and all related documentation should be located in a central location in each department, readily accessible to employees and, upon request, to Career and Protective Services and regulatory agencies. Career and Protective Services shall provide assistance in program development and employee training, but the ultimate responsibility for its implementation rests with each department.

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PROCEDURES

Deans and vice presidents will: ensure injury and illness prevention program compliance for their academic and administrative units; assign responsibility for coordinating injury and illness prevention efforts to department heads, directors, managers, and other appropriate individuals who can assure that all aspects of the program are carried out; and ensure that each unit develops, implements, and maintains an injury and illness prevention program which is consistent with guidelines provided by Career and Protective Services and is designed to address the specific hazards found in that unit.

Department heads, directors, and managers should: provide employees with information and training on hazards in their work area; take steps to correct hazardous conditions and unsafe practices immediately upon recognition; conduct and document self-inspections; maintain communication with employees regarding hazardous conditions, unsafe activities, and the correction of safety hazards; ensure that all accidents are carefully reviewed and that appropriate actions have been taken to prevent their recurrence; conduct safety meetings and document their occurrence; and take appropriate disciplinary actions against employees failing to comply with the department's injury and illness prevention program.

Employees should: comply with the injury and illness prevention program established by their department; use their training and professional knowledge to avoid potential hazards and to maintain a safe working environment; use common sense and good judgment when performing job tasks; and report all possible hazards and accidents immediately to their supervisor.

Career and Protective Services will: provide academic and administrative departments with guidelines for developing injury and illness prevention programs; assist departments in implementing and maintaining their injury and illness prevention programs; recommend constructive changes to departments' injury and illness prevention programs; monitor the overall effectiveness of the university's injury and illness prevention efforts; periodically audit the university's injury and illness prevention program; and provide feedback to those in charge of the individual units as well as to the appropriate dean or vice president.

Training Requirements

Each university department is responsible for providing specific safety training to its employees. Employees should be given sufficient instruction with respect to their job assignments so that they will understand the tasks to be performed and the predictable hazards to be avoided. All training must be documented and such documentation maintained in the department.

Training should be conducted: when an employee is first hired; to familiarize a new employee with the hazards of the tasks for which he/she will be responsible; at least annually after the initial training has been completed (i.e., refresher training); and whenever a new hazard is introduced into the work environment.

Although the responsibility of providing employee training lies primarily with the academic or administrative departments, Career and Protective Services will assist departments in accomplishing this objective. Through new employee orientation, Professional Development

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Illness and Injury Prevention
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will provide new employees with basic information and training concerning injury and illness prevention. As a means of assisting departments in satisfying at least a portion of the training requirements, Career and Protective Services will provide training sessions on general safety topics of concern to the entire campus community. These training sessions are scheduled through Professional Development at (213) 740-5885. In addition, Career and Protective Services will occasionally assist departments in providing employee safety training on topics of a unique or specialized nature.

For more complete guidelines, please refer to the USC Injury and Illness Prevention Program, which can be found in the USC Safety Manual. A template for a departmental written Injury and Illness Prevention Program is available from Career and Protective Services by calling (213) 740-6448 on the University Park campus or (323) 442-2200 on the Health Sciences campus, or from the following Web address:

http://srm.usc.edu/Safety_Dept_Web/jobsafety/injury/booklet.html

The USC Safety Manual can be found at:

http://srm.usc.edu/Safety_Dept_Web/Administration/manual/manual.html

A printed version of the Safety Manual is available from Career and Protective Services by calling (213) 740-6448 on the University Park campus or (323) 442-2200 on the Health Sciences campus.

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PREMISES SAFETY

PURPOSE

The purpose of this policy is to establish procedures for inspections, identification and correction of hazards on university property, both outdoors and indoors, in order to protect faculty, staff, students and visitors from injury.

APPLICABLE TO

This policy applies to all university schools and departments.

POLICY

All university premises, both outdoor and indoor, are to be inspected at least annually by departments/groups occupying areas and Environmental Health and Safety. Identified hazards must be corrected on a timely basis. Modifications or repairs required for correction of safety hazards located outdoors or in common areas will be paid for from a central fund administered by Facilities Management Services. Building occupants are responsible for funding of corrections or changes that are within the area(s) they occupy.

PROCEDURES

Career and Protective Services will lead an inspection of all outside areas at least once per year and will inspect common indoor areas at least once per year. Each department will inspect its work areas in accordance with Safety Policy Number 004 "Safety Inspections."

The Department of Public Safety, Career and Protective Services, Facilities Management Services, and others also will note hazards during other routine activities.

All safety hazards identified outdoors or in common areas will be noted on the inspection form developed for that purpose and forwarded to Career and Protective Services. Career and Protective Services will request that Facilities Management Services issue a work order for items that are routine repairs or may be accomplished relatively inexpensively.

Hazards that require modifications of premises or large expenditures for correction will be assigned a priority by the Associate Vice President for Facilities Management Services and the Associate Vice President for Career and Protective Services.

Career and Protective Services will maintain records of the identification and correction of safety hazards.

Inspection forms are available at:

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http://srm.usc.edu/Safety_Dept_Web/jobsafety/injury/injury.html

For more information about Premises Safety, contact Career and Protective Services by calling (213) 740-6448 on the University Park campus or (323) 442-2200 on the Health Sciences campus.

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MEDICAL SURVEILLANCE

PURPOSE

The purpose of this policy is to ensure that appropriate medical surveillance is provided to university employees who may be injured or suffer illness due to work-related exposure to harmful agents as outlined in the addendum to this policy.

APPLICABLE TO

This policy applies to all university schools and departments whose employees have the potential to be exposed to harmful agents.

POLICY

University schools and departments shall take engineering, administrative and personal protective measures as appropriate to minimize employee exposures to hazardous biological, chemical, physical, or radioactive agents.

Despite these efforts, employees may be exposed to and/or injured by potentially harmful agents. University schools and departments will ensure that these employees receive, at no cost to the employees, medical surveillance, in particular pre-exposure assessments and post-exposure evaluations and/or bioassays, in accordance with standards established by the Occupational Safety and Health Administration (OSHA), National Institute of Health (NIOSH), and other regulatory agencies.

PROCEDURES

Deans and vice presidents will assign to department heads, directors, managers, and principal investigators the responsibility for ensuring that employees who require medical surveillance are identified and receive medical treatment as required; and shall ensure that sufficient department funds are allocated to pay for medical surveillance that may be required for employees within their respective academic and administrative units.

Department heads, directors, managers, and principal investigators must ensure that employee exposures to chemical, physical, and biological hazards are minimized via the use of engineering controls such as sharps protective devices and needleless systems, administrative controls, and personal protective equipment; inform employees of all potential hazardous agents and conditions known to exist in the workplace; provide employees with training and information that may be used to minimize exposure to hazards in the workplace; with the assistance of Career and Protective Services, identify employees requiring medical surveillance; ensure that employees receive appropriate medical surveillance when warranted; ensure that all accidents are carefully reviewed and that appropriate actions have been taken to prevent their recurrence; and

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forward original employee medical surveillance records to Career and Protective Services for permanent safekeeping.

Employees must inform their supervisors of known or suspected exposures to hazardous agents in their workplace; inform their supervisors of known or suspected injuries or illnesses they have suffered as a result of exposure to hazardous agents in their workplace; use, as instructed, engineering controls such as sharps protective devices and needleless systems, administrative controls, and personal protective equipment to avoid exposures to hazardous agents; and use their training and professional knowledge to avoid potential hazards and to maintain a safe work environment.

Career and Protective Services provides individual academic and administrative departments with guidelines for determining which employees require medical surveillance as well as the type and frequency of the medical surveillance required; assists departments in identifying sources for obtaining medical surveillance; audits each department's medical surveillance program to ensure that employees are provided appropriate medical monitoring; and provides safekeeping for employee medical surveillance records for a minimum of thirty years after termination of employment.

Each department is responsible for providing medical surveillance to its employees as advised by Career and Protective Services in accordance with OSHA and other regulatory agency standards. Medical surveillance criteria are outlined in the attached addendum.

For more complete guidelines pertaining to medical surveillance, please refer to the Personal Protective Equipment and Biological Safety chapters of the USC Safety Manual:

http://srm.usc.edu/Safety_Dept_Web/Administration/manual/manual.html

A printed version of the Safety Manual is available from Career and Protective Services by calling (213) 740-6448 on the University Park campus or (323) 442-2200 on the Health Sciences campus.

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Addendum - Safety Policy # 13

Medical Surveillance Requirements

Program	Employees Affected	Medical Surveillance Required
Respiratory Protection	Employees who wear respiratory	Pre-assignment physical
	protection equipment	assessment (annual)
Bloodborne Pathogens (includes	Employees exposed to blood and	HBV antibody testing
puncture wounds)	other body fluids	 offer HBV vaccination
		Post-exposure evaluation and follow-up as necessary
Infectious Agents	Employees routinely exposed to infectious agents	Tests and examinations relevant to exposure
Animal Care	Animal handlers	Pre-exposure physical examination
		 Annual physical examination HBV and tetanus vaccination toxoid, when required by task assessment
		TB skin testChest X-ray
Hazardous Materials	Employees receiving acute or chronic chemical exposures	Tests and examinations relevant to exposure
Laser Radiation	Class 3b and Class 4 laser workers and incidentally exposed employees	 Pre-assignment eye exams Post-exposure eye exams Visual acuity exams for incidental employees
Asbestos Management (includes Asbestos Abatement Team)	Facilities Management Services and Career and Protective Services staff routinely exposed to asbestos	 Pre-assignment physical exa mination Annual physical examination Periodic chest X-ray
Hearing Conservation	Employees exposed to average noise levels >85 decibels	Pre-exposure baseline audiogram Annual audiogram
Emergency Response (Career and Protective Services staff)	Emergency responders	Pre-exposure physical examination
Incidental Exposures to Hazardous Physical, Chemical, Biological or Radioactive Agents.	All exposed employees	Annual physical examination Tests and examinations relevant to exposure

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SEISMIC SAFETY

PURPOSE

The purpose of this policy is to reduce risks and develop emergency response programs in order to prevent injury to members of the campus community, reduce damage to facilities, and minimize disruption of university programs due to seismic activity.

APPLICABLE TO

This policy applies to all university schools and departments.

POLICY

Structural Seismic Safety

The university, under the leadership of Facilities Management Services, shall assume responsibility for structural seismic safety. It is the policy of the university to ensure that new buildings meet the structural earthquake standards of the Uniform Building Code, as adopted by the City of Los Angeles where applicable, and that existing buildings meet applicable codes and standards as required.

Nonstructural Seismic Safety

The university, under the leadership of Facilities Management Services, shall ensure that major built-in-place nonstructural and architectural building elements meet applicable nonstructural standards and codes.

Vice presidents, deans, directors and department heads shall ensure that department-owned nonstructural equipment and furnishings meet standards that provide reasonable protection against injury or damage which may result from seismic activity. Mitigation measures include but are not limited to:

- bolting bookcases or shelving units over 48" high to a wall;
- installing restraining lips on laboratory storage shelves;
- restraining gas cylinders with two chains or cables;
- moving heavy items stored over shoulder height to lower storage locations;
- using seismic braces to secure desktop computers; and
- purchasing furnishings that are resistant to earthquake shaking, such as shelving units that attach to walls and file systems that attach to walls and floors.

Facilities Management Services shall provide favorable unit cost options for required upgrades.

Career and Protective Services conducts periodic inspections of furnishings, equipment, and other nonstructural items installed by building occupants, ensuring that potential nonstructural hazards are identified and communicated to department heads.

Emergency Preparedness and Response Planning

The university, under leadership by Career and Protective Services, maintains an emergency response planning, training, and education program. Business Affairs staff develops, exercises and implements the university's Emergency Operations Plan, including Emergency Operations Centers on both the University Park and Health Sciences Campuses. Emergency response teams are trained in key departments, and staff, faculty, and students are educated in emergency preparedness through seminars and distribution of written emergency procedures.

Vice presidents, deans, directors and department heads should have in place internal emergency plans and procedures, including policies and procedures specifying the communications and decision process for response to campus emergencies or other adverse conditions. Internal school or department emergency plans also should specify the services or programs which are vital to that unit and the campus community, and which the unit will strive to maintain under adverse conditions and during campus emergencies. Schools and departments also should maintain basic emergency supplies and ensure that staff are assigned to respond to local emergency situations appropriately.

Key emergency preparedness measures for department heads are described in the pamphlet, "Campus Guidelines for Department Emergency Preparedness," which is available from Career and Protective Services by calling (213) 740-6199.

PROCEDURES

- Vice presidents, deans, directors and department heads should ensure that department-owned nonstructural items are restrained against earthquake shaking, should purchase earthquake-resistant equipment whenever available at reasonable cost, and should have in place internal emergency plans and procedures.
- Facilities Management Services is responsible for ensuring that when facilities are remodeled, affected nonstructural elements are upgraded to current seismic standards.
- Facilities Management Services is responsible for ensuring that when campus departments or groups move nonstructural furnishings to new locations or into new facilities, major furnishings are seismically braced or restrained.
- When departments purchase new furnishings, Purchasing Services shall recommend the purchase of earthquake-resistant furnishings such as wall- and floor-braced storage cabinets.
- Career and Protective Services staff shall provide guidance and assistance to all departments in identifying and mitigating nonstructural seismic hazards, and planning assistance to

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departments in the development and implementation of internal emergency plans and procedures.

For more information about Seismic Safety, contact Career and Protective Services by calling (213) 740-6448 on the University Park campus or (323) 442-2200 on the Health Sciences campus.

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Senior Vice President for Administration

ERGONOMIC SAFETY

PURPOSE

The purpose of this policy is to minimize ergonomic hazards and to prevent ergonomic-related injuries.

APPLICABLE TO

This policy applies to faculty, staff, principal investigators, department heads, department chairs, managers, supervisors and students who may encounter ergonomic hazards during the course of their daily work activities (including but not limited to computer work, laboratory pipetting, and material handling.)

POLICY

Ergonomic-related injuries may be prevented through training, education, supervision, work schedule changes, workstation redesign, and the use of ergonomic accessories. University departments, with the assistance of Career and Protective Services, should take appropriate control measures to eliminate ergonomic hazards from the work environment.

PROCEDURES

Employees:

- should evaluate their own workstations (an office ergonomics checklist is available through Risk Management and Career Services);
- should implement proper ergonomic work practices to prevent repetitive strain injuries and discomfort:
- should attend the ergonomic safety training courses provided by Career and Protective Services:
- must immediately inform their supervisors of any ergonomic-related discomfort.

Principal Investigators, Managers and Supervisors:

- should determine which operations require special attention in order to eliminate ergonomic-related hazards;
- should take the necessary steps when potential hazards are identified to eliminate the ergonomic hazard(s);
- should consider ergonomic design elements prior to construction of a new work area, implementation of a new process, or use of newly purchased tools and equipment; and
- must investigate all ergonomic complaints in a timely manner and correct any deficiencies found.

Career and Protective Services:

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- Will provide all employees with basic information about:
 - ? Common musculoskeletal disorders (MSD'S)
 - ? Reporting MSD'S
 - ? Description of OSHA's standards
- is available to assist in identifying and eliminating ergonomic hazards;
- provides guidance and recommendations to the university community to ensure proper ergonomic practices are implemented and that ergonomic-related injuries are minimized;
- assists in the ergonomic redesign of work areas, processes, procedures, and work tools;
- conducts ergonomic-related accident investigations as needed;
- performs workstation evaluations to determine solutions to ergonomic deficiencies; and
- offers training classes in ergonomic safety on an on-going basis.

For more complete guidelines pertaining to ergonomic safety (including the office ergonomics checklist), please refer to the Occupational Safety section of the USC Safety Web site

http://srm.usc.edu/Safety_Dept_Web/jobsafety/ergonomics/ergonomics.html

A printed version of the Safety Manual is available from Career and Protective Services by calling (213) 740-6448 on the University Park campus or (323) 442-2200 on the Health Sciences campus.

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BLOODBORNE PATHOGENS

PURPOSE

The purpose of this policy is to ensure that appropriate evaluation and follow-up care is provided to university employees who may be injured or suffer illness due to work-related exposure to biological agent(s) contained in human or non-human primate blood, human or non-human primate blood products, or other potentially infectious materials.

APPLICABLE TO

This policy applies to all university employees who have the potential to be exposed to human or non-human primate blood, human or non-human primate blood products, human or non-human primate cell lines, and/or other potentially infectious materials.

POLICY

All employees with an occupational exposure to bloodborne pathogens shall be evaluated promptly in accordance with the prevailing public health and infection control standards and the Cal/OSHA Bloodborne Pathogen Standard. All employees have the right to be evaluated, treated and counseled by health care providers who are trained in communicable diseases and by certified HIV counselors.

PROCEDURES

Principal investigators and supervisors have the responsibility for ensuring that exposed employees receive a medical evaluation and treatment as determined by the employee's physician. Evaluation and treatment will be paid for by Workers' Compensation. Principal investigators and supervisors should ensure that all exposures to human material or non-human primate materials are carefully reviewed and that appropriate actions have been taken to prevent their recurrence.

The USC healthcare provider will follow the guidelines as stated in the USC Safety Manual, Section 2-4, *Management of Occupational Exposure to Bloodborne Pathogens*. The physician will certify the exposure as a direct contact with blood or blood products and counsel the employee on the potential for transmission of HBV, HCV, or HIV and the need for further evaluation and treatment.

For more complete guidelines, please refer to the USC Biological Safety Program, which can be found in the Laboratory Safety section of the USC Safety Manual:

http://srm.usc.edu/Safety_Dept_Web/Administration/manual/LabSafety/lab_manual.html

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A printed version of the Safety Manual is available from Career and Protective Services by calling (213) 740-6448 on the University Park campus or (323) 442-2200 on the Health Sciences campus.

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