
**COMPREHENSIVE SAFETY AND HEALTH PROGRAM
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**THE UNIVERSITY OF OKLAHOMA HEALTH SCIENCES CENTER
THE UNIVERSITY OF OKLAHOMA -TULSA**

COMPREHENSIVE SAFETY AND HEALTH PROGRAM

I. SCOPE

This program affects all persons who are employed by the University of Oklahoma Health Sciences Center and Tulsa campuses and related facilities (OUHSC/OU-Tulsa).

II. RESPONSIBILITIES

A. The Senior Vice President and Provost for OUHSC and the President of OU-Tulsa are responsible for:

1. assuring compliance of their respective campus(es) with the State of Oklahoma occupational safety and health rules and regulations;
2. enforcing the *OUHSC/OU-Tulsa Comprehensive Safety and Health Policy and Program*; and
3. providing continuing support for institutional safety and health.

B. The Environmental Health & Safety Office (EHSO) is responsible for:

1. coordinating the development of policies and programs to maintain compliance with environmental and occupational health and safety rules and regulations;
2. auditing departmental compliance and reporting compliance status to the department heads and supervisors;
3. communicating with management, employees, and regulatory agencies on OUHSC/OU-Tulsa compliance matters;
4. conducting initial and refresher safety training sessions as outlined by individual compliance programs, documenting such training, maintaining program training files and assisting with departmental training programs;
5. providing technical occupational safety and environmental health assistance to personnel and departments;
6. reviewing accident and injury reports and determining appropriate response action(s);
7. reviewing employee-reported unsafe or unsure conditions, determining appropriate response action(s), and recommending corrective action where appropriate;
8. submitting required permit and other environmental and occupational health and safety compliance reports and documentation in a timely manner to the appropriate regulatory agency, and
9. performing any other duties identified in individual compliance programs.

C. Deans and Administrative Heads are responsible for:

1. complying with and enforcing this *OUHSC/OU-Tulsa Comprehensive Safety and Health Policy and Program* for their respective areas;
 2. designating coordinators within their respective areas to be responsible for compliance when required by a specific Policy or Program; and
 3. providing a list of these coordinators and the corresponding department(s) and/or work area(s) for which they are responsible to the EHSO.
- D. Designated Coordinators are responsible for:
1. ensuring that all employees in their respective areas receive appropriate safety training as required by this Program;
 2. assuring that employee job descriptions include statements requiring that the employee perform his/her duties in safe and healthful manner;
 3. assuring that performance reviews of employees include an evaluation of employee work behavior toward safety;
 4. assuring that appropriate disciplinary action is taken when any employee does not comply with precautionary safety measures, and
 5. performing any other duties identified in individual compliance programs.
- E. Department Heads are responsible for:
1. complying with and enforcing the *OUHSC/OU-Tulsa Comprehensive Safety and Health Policy and Program* and observing all safety rules and regulations;
 2. encouraging and actively supporting employee involvement in work place safety;
 3. providing adequate funding for required safety equipment and material; and
 4. performing any other duties identified in individual compliance programs.
- F. Supervisors are responsible for:
1. complying with and enforcing the *OUHSC/OU-Tulsa Comprehensive Safety and Health Policy and Program*, observing all safety rules and regulations, and wearing protective equipment where required;
 2. encouraging and actively supporting employee involvement in work place safety;
 3. ensuring that appropriate safety equipment and personal protective equipment (PPE) is provided in appropriate sizes and types, is readily available, and is in a usable condition;
 4. ensuring that employees use PPE properly, that employees demonstrate an ability to use PPE properly before allowing them to perform work requiring the use of PPE, and identifying and retraining employees whom the supervisor believes do not have the understanding and skill required to properly use the required PPE;
 5. assuring the availability, accuracy, and placement of all required labels, signs or placards for their work area;
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6. ensuring that all employees under their direction receive appropriate safety training as required by this Program;
 7. assuming responsibility for visitors within their assigned area, requiring that they follow the same rules as employees, and ensuring that they are escorted or supervised at all times;
 8. reporting accidents using the protocol identified in this Program and assisting with accident investigations;
 9. performing routine surveillance of assigned work areas to identify potential hazards and ensure compliance, and taking appropriate action if hazards are identified;
 10. ensuring that good housekeeping practices are maintained in assigned work area; and
 11. performing any other duties identified in individual compliance programs.
- G. Each employee is responsible for:
1. complying with the *OUHSC/OU-Tulsa Comprehensive Safety and Health Policy and Program*;
 2. completing all safety training as required by this Program;
 3. following all instructions on how to perform a job properly and safely and ensuring that they have been authorized to perform that job before undertaking it;
 4. performing his/her job in accordance with safety precautions communicated to them during training sessions and other educational programs, including wearing PPE;
 5. reporting any unsafe condition to his/her supervisor immediately;
 6. notifying his/her supervisor immediately in the event of any occupational illness, injury, chemical exposure or accident; and
 7. performing any other duties identified in individual compliance programs.

III. HAZARD IDENTIFICATION

A. AUDITS/SURVEYS/INSPECTIONS

1. **Campus Asbestos-Containing Material Inspection**

An AHERA accredited asbestos inspector from the EHSO and a representative from the facility Operations/Site Support department will inspect Oklahoma City and Tulsa campus buildings periodically as identified in the *OUHSC/OU-Tulsa Asbestos Operations and Maintenance Program*. A subsequent report indicating findings and recommended corrective actions shall be issued to the appropriate Director of Operations.

2. **Laboratory Surveys/Audits**

The EHSO will conduct laboratory inspections periodically. Survey results and corrective actions are issued to the laboratory's Principal Investigator and copied to the Departmental Chair.

Laboratory supervisors are encouraged to perform routine safety audits to ensure the continuing day-to-day effectiveness of safety practices and procedures. Guidelines for conducting the audit are outlined in the OUHSC/OU-Tulsa *Laboratory Safety Manual*.

3. **Other Work Locations**

Supervisors are encouraged to perform routine safety inspections of their respective area on a periodic basis and contact the EHSO for technical assistance. The EHSO may perform periodic inspections of these areas and provide recommendations to the applicable supervisor. The EHSO will also conduct inspections or audits upon request from the supervisor or employee and provide recommendations.

B. **EMPLOYEE-REPORTING SYSTEM**

Employees are trained during the annual Hazard Communication training sessions on how to report unsafe or unsure situations (anonymously if necessary) via phone, phone message (24 hours), fax, or campus mail. The EHSO will review the employee report and determine an appropriate response action. Individual departments are encouraged to develop departmental reporting systems.

C. **ACCIDENT/INJURY/ILLNESS REPORTING AND INVESTIGATION PROCEDURES**

All occupational injuries, illnesses and exposures, including minor injuries requiring first aid should be reported to the employee's supervisor.

In the event of a occupational exposure, injury, or illness, the immediate supervisor and the employee are responsible for completing and signing the appropriate paperwork. Procedures are discussed in Section V.B., *Illness/Injury/Exposure Procedures*.

Copies of all injury/illness/exposure reports should be forwarded to the EHSO. Reports of slips, trips and falls should be forwarded for investigation to the appropriate campus Risk Manager. The EHSO is responsible for reviewing all other reports and determining whether follow-up is needed.

D. **ACCIDENT AND INJURY TREND ANALYSIS**

The OUHSC/OU-Tulsa EHSO is responsible for reviewing periodic accident and injury trend reports to identify target areas for further study. The EHSO may then generate applicable status reports to each department when appropriate.

E. **ENVIRONMENTAL MONITORING**

1. Environmental monitoring will be performed by the EHSO when:
 - a. required by a specific regulation; or
 - b. when employees notify the EHSO of the following situations where exposures are suspected to exceed an OSHA permissible exposure level:
 - (1) where the employees are exhibiting signs and symptoms of overexposure,
 - (2) where large quantities of specific chemicals must be handled,
 - (3) when engineering control measures such as fume hoods are not feasible,

- (4) where highly toxic materials are being used,
- (5) when a spill has occurred, or
- (6) whenever an employee suspects the exposure to be above the recommended levels.

- 2. The EHSO will notify the affected employee(s) and supervisors of exposure results as soon as possible after receipt of laboratory results.

F. NEW FACILITY DESIGN, MATERIAL, AND EQUIPMENT ANALYSIS

A&E Services, Operations/Site Support, Telecommunications, and other appropriate departments are responsible for designing and constructing projects that comply with environmental, occupational safety and health, and applicable building codes and regulations and should contact the EHSO for technical assistance where needed for compliance.

When departments select new material and equipment they should contact the EHSO to provide assistance in ensuring that material or equipment complies with any applicable occupational safety and health regulations, recommended standards, or guidelines.

IV. HAZARD PREVENTION AND CONTROL

A. ENGINEERING CONTROLS

Engineering controls, including the elimination of hazards or exposures by design, enclosure, barriers, or local ventilation, should be used whenever possible. Administrative controls and the use of PPE should be utilized when engineering controls are not effective or feasible.

B. STANDARD OPERATING PROCEDURES

Standard operating procedures required by specific regulations have been developed in the individual compliance programs. Each department is encouraged to develop standard operating procedures for specific departmental operations to ensure safe work practices are followed and approved safety devices are utilized for each operation.

C. PERSONAL PROTECTIVE EQUIPMENT

The supervisor is responsible for assessing their respective work area to determine if hazards that require the use of head, eye, hand, or foot protection are present or likely to be present. The supervisor is also responsible for selecting the appropriate types and sizes of PPE and ensuring that the PPE is readily available in a usable condition. PPE use is addressed by the *OU Personal Protective Equipment Program* and respirator use is addressed by the *OUHSC/OU-Tulsa Respiratory Protection Program*. Gloves and other protective clothing requirements are required for specific operations identified in the *OUHSC/OU-Tulsa Laboratory Safety Manual* and the *OUHSC/OU-Tulsa Infectious Diseases Policy*.

D. MEDICAL SURVEILLANCE

Medical surveillance is provided when an employee utilizes protective equipment that may pose an additional physiological burden such as a respirator, the employee is exposed to a specific substance covered in 29 CFR 1910 Subpart Z "Toxic and Hazardous Substances", or where identified in individual compliance programs.

The appropriate campus Employee Health department is responsible for retaining employee medical surveillance records for 30 years. Employee Health must make the medical surveillance records available to the employee within 15 working days of request as required by 29 CFR 1910.1020.

E. SAFETY TRAINING PROGRAMS

Safety training for OUHSC/OU-Tulsa personnel is provided in a variety of venues to accommodate the wide diversity of operations on campus.

1. General Requirements

Each department is encouraged to provide in-house safety training to departmental employees and may contact the EHSO for informational resources and assistance.

Supervisors are responsible for training their employees in job orientation and departmental standard operating procedures.

Where additional safety or environmental training is warranted, requested, or required, the EHSO may provide either the training or the necessary resources for the department to conduct that training.

2. On-line Training

The EHSO provides on-line training programs that are available to all OUHSC/OU-Tulsa personnel. Initial sessions are comprehensive in nature, with refresher sessions providing a brief review or updates only. The following on-line training programs are available.

a. Hazard Communication, which includes:

- (1) Hazard Communication
- (2) Emergency Procedures/First Aid Awareness
- (3) Injury and Exposure Reporting
- (4) Spill Procedures
- (5) Infectious Diseases Awareness
- (6) Personal Protective Equipment
- (7) Waste Disposal
- (8) Indoor Air Quality Procedures
- (9) Animal Safety Awareness
- (10) Ergonomics
- (11) Safe Lifting

b. Laboratory Safety, which includes:

- (1) Chemical Hygiene Requirements
- (2) Personal Protective Equipment
- (3) Biological Safety

- (4) Animal Safety Awareness
 - (5) Chemical and Biological Waste Management (including DOT requirements for packaging biomedical waste for shipment)
 - (6) Spill Procedures
 - c. Bloodborne Pathogens, which includes:
 - (1) Bloodborne Pathogen Requirements
 - (2) Hand Hygiene Requirements
 - (3) Personal Protective Equipment
 - (4) Biological Waste Management (including DOT requirements for packaging biomedical waste for shipment)
 - (5) Exposure and Spill Procedures
 - d. Tuberculosis (TB) Awareness Training, which includes:
 - (1) TB Awareness
 - (2) Patient Procedures
 - (3) Respiratory Protection Requirements
 - (4) TB Skin Testing Procedures
 - (5) Exposure Procedures
 - (6) Procedure-Specific Precautions
 - e. Fire Safety, which is provided by the University Fire Marshal:
 - (1) Use of Fire Extinguishers
 - (2) Emergency Procedures
 - f. Department of Transportation (DOT) Shipping Biological Materials
 - g. Health Care Refresher Training, which includes:
 - (1) Hazard Communication
 - (2) Antineoplastic/Cytotoxic Drugs
 - (3) Bloodborne Pathogens
 - (4) PPE
 - (5) Tuberculosis
 - h. Asbestos Awareness Training
 - i. First Responder Awareness Training
3. **Departmental**

Departmental training containing information outlined above in Section IV.E.1 will be provided by the EHSO upon request. Training for compliance with other individual compliance programs (see Section VII., *Individual Compliance Programs*) for which an on-line program is not available, will be provided by the EHSO.

4. **Quarterly Safety Training**

Periodically, safety information is provided to all OUHSC employees through distribution of an electronic or hard-copy newsletter or through other safety promotions.

V. **EMERGENCY PLANNING AND PREPARATION**

A. **EMERGENCY PROCEDURES/FIRST AID**

It is recommended that each department have at least one person trained in basic first aid, cardio-pulmonary resuscitation, and bloodborne pathogens training, and be provided the opportunity to receive the hepatitis B vaccine. All other employees should be trained in the *OUHSC/OU-Tulsa Emergency Procedures/First Aid Awareness Program*. It is also recommended that each department have first aid kit(s) and designate a party responsible for maintaining the first aid kit(s).

B. **INJURY/ILLNESS/EXPOSURE PROCEDURES**

In the event an employee is injured, receives potentially hazardous exposure to a hazardous substance, or develops signs or symptoms of overexposure to a hazardous chemical to which the employee may have been exposed on the job, the affected employee should notify his/her supervisor. The supervisor should first secure appropriate medical attention for the employee and then coordinate with the EHSO to obtain the appropriate SDS when applicable.

In the event of an employee occupational exposure, injury, or illness, the immediate supervisor is responsible for completing and signing a *Supervisor's Report of Injury* form. The employee must complete an *Employee's Report of Injury* form. Both forms should be faxed to the appropriate Human Resources department within 24 hours of the incident. Copies of forms and procedures are provided at <http://hr.ou.edu/benefits/Workerscompensation.asp>.

C. **MEDICAL FACILITY ARRANGEMENTS**

The following facilities are recommended for any occupational injury or exposure:

1. **Tulsa Campuses**

Med Center
2929 S. Garnett
Tulsa, OK
(918) 665-1520

Hours: 8:00 a.m. - 10:00 p.m. Monday - Saturday, 11:00 a.m. - 7:00 p.m. Sunday

MedCenter South
10221 E. 81st St
Tulsa, Oklahoma
(918) 252-9300

Hours: 8:00 a.m. - 10:00 p.m. Monday - Saturday, 11:00 a.m. - 7:00 p.m. Sunday

MedCenter Midtown
1623 S. Utica
Tulsa, Oklahoma
(918) 392-5100
Hours: 8:00 a.m. - 10:00 p.m. Monday - Saturday, 11:00 a.m. – 7:00 p.m. Sunday

St. John Medical Center Emergency Room
1923 S. Utica
Tulsa, OK
(918) 744-2191

Saint Francis Hospital
6161 S Yale
Tulsa, OK
(918) 494-2200

2. **Oklahoma City Campus**

Employee Health
OU Physicians Building
825 NE 10th Suite 2C
Oklahoma City, OK
405/271-9675
Hours: 8:00 a.m. - 4:30 p.m. Monday through Friday

OU Medical Center Presbyterian Tower Emergency Room
700 NE 13th Street
Oklahoma City, OK
405/271-3667

3. **Enid Employees**

Integrus Bass Pavilion
Occupational Medicine Dept.
401 S. Third
Enid, OK 73701
(580) 548-1112

4. **Lawton Employees**

AM-PM Clinic
4411 West Gore Blvd
Lawton, OK
580/355-0575
Prompt Care Center
412 SW Summit
Lawton, OK
580/357-9685

5. **All Other Locations**

After notifying their supervisor, employees should report to the nearest appropriate medical

facility or emergency room and follow-up by telephone with OUHSC Employee Health, (405) 271-9675, or, for Tulsa employees, OU-Tulsa Human Resources, (918) 660-3196, the next working day.

D. EMERGENCY RESPONSE & EVACUATION PLAN

Emergency response and evacuation plans/procedures are covered by the OUHSC *Emergency Operations Plan for the Campus Community* maintained by the OUHSC Police Department, and the OU-Tulsa *Emergency Procedures Manual* for the Tulsa campuses.

Employees are trained in basic emergency procedures in the Hazard Communication and Fire Safety training identified in Section V.E., *Training*. In addition, each department is supplied with and encouraged to post a copy of the applicable Emergency Procedures brochure in a conspicuous place.

E. FIRE SAFETY PLAN

A&E Services and the OUHSC Fire Marshal are responsible for ensuring that the design and installation of building fire exits comply with all applicable building codes and regulations. Operations is responsible for ensuring that water-based fire suppression systems except fire extinguishers are properly installed, maintained, serviced, and marked according to the applicable National Fire Protection Association (NFPA) codes and OSHA regulations. The individual department that purchases a non-water-based fire suppression system is responsible for ensuring that the system is properly installed, maintained, serviced, and marked according to the applicable NFPA codes and OSHA regulations.

The OUHSC Fire Marshal is responsible for developing and maintaining all fire evacuation plans and the placement, proper type, and maintenance of fire extinguishers for the Oklahoma City campus. The EHSO-Tulsa is responsible for developing and maintaining all fire evacuation plans and the placement, proper type, and maintenance of fire extinguishers for the Tulsa campus.

OU does not employ a specific fire brigade and does not require employees to use fire extinguishers or other fire fighting apparatus to combat fires. However, all employees are instructed annually on how to properly operate available fire extinguishers, proper and safe procedures to extinguish fires, and procedures to alert other employees and Campus Police/Campus Security or other appropriate emergency personnel of the fire emergency.

VI. PROGRAM REVIEW AND EVALUATION PROCEDURES

The EHSO is responsible for coordinating a periodic review of the OUHSC/OU-Tulsa *Comprehensive Safety Policy and Program* to determine the effectiveness, program regulatory compliance, and departmental compliance of the program and revising the program as needed.

VII. INDIVIDUAL COMPLIANCE PROGRAMS

Individual compliance programs may be found in the following sections.

- A. HAZARD COMMUNICATION TAB VII.A.
- B. LABORATORY SAFETY TAB VII.B.
- C. INFECTIOUS DISEASES TAB VII.C.
- D. ASBESTOS OPERATIONS AND MAINTENANCE TAB VII.D.

E. HOT WORK TAB VII.E.
F. RESPIRATORY PROTECTION TAB VII.F.
G. HEARING CONSERVATION TAB VII.G.
H. CONFINED SPACE ENTRY TAB VII.H.
I. PHYSICAL/MECHANICAL HAZARDS TAB VII. I.
J. POWERED INDUSTRIAL TRUCKS/FORKLIFT SAFETY TAB VII.J.
K. OFFICE SAFETY TAB VII.K.
L. EMERGENCY PROCEDURES/FIRST AID AWARENESS TAB VII.L.
M. WASTE DISPOSAL, SPILLS, AND LABORATORY CLOSE-OUT TAB VII.M
N. PERSONAL PROTECTIVE EQUIPMENT TAB VII.N.