



American Jewish University

INJURY AND ILLNESS PREVENTION PROGRAM (IIPP)

July 1, 2020

## 1.0 INTRODUCTION

American Jewish University makes all reasonable efforts to:

- Protect the health and safety of University faculty, staff, and students;
- Provide safe workplaces - academic, research, and administrative - for faculty, staff and students;
- Provide information to faculty, staff, and students about health and safety hazards;
- Identify and correct health and safety hazards and encourage faculty, staff and students to report hazards;
- Provide information and safeguards for those on campus and in the surrounding community regarding environmental and safety hazards arising from operations at American Jewish University.

Per California Code of Regulations, Title 8, Section 3203 (<http://www.dir.ca.gov/Title8/3203.html>), American Jewish University has adopted an Injury and Illness Prevention Program (IIPP) which describes specific requirements for program responsibility, compliance, communication, hazard assessment, accident/exposure investigations, hazard correction, training, and recordkeeping.

Requirements outlined in this manual are mandated by regulation where the word “shall” is used and are advisory in nature where the word “should” is used.

## 2.0 RESPONSIBILITIES

### 2.1 Program Administrator

The ultimate responsibility for AJU’s IIPP rests with the V.P., & Chief Operating Officer of the American Jewish University, Adrian Breitbart.

The program administrator is:

- Name: Kathy Spira
- Title: Senior Director of Human Resources
- Address: 15600 Mulholland Drive, Bel Air, CA 90077
- Telephone: (310) 440-1203
- Email: [Kathy.Spira@aju.edu](mailto:Kathy.Spira@aju.edu)
- Responsibilities include:
  - Advising senior management on safety and health issues.
  - Working with senior management to develop safety and health guidelines and policies.
  - Preparing and distributing the University's guidelines, policies and procedures on safety and health issues.
  - Maintaining current information on local, state and federal safety and health regulations.
  - Serving as liaison with governmental agencies.
  - Planning, organizing and coordinating safety trainings.
  - Developing a code of safe practices and inspection guidelines.
  - Arranging for safety and health inspections and follow up to insure necessary corrective action is completed.
  - Establishing, conducting and maintaining an injury/illness/accident report and investigation procedure.
  - Reviewing injury and illness trends.
  - Establishing a system for maintaining the records of inspection, hazard abatement and

training.

## **2.2 Senior Managers**

Senior Managers are responsible for ensuring that:

- Individuals under their management have the authority to implement appropriate health and safety policies, practices, and programs.
- Areas under their management have adequate funding for health and safety programs, practices, and equipment.
- Areas under their management are in compliance with American Jewish University health and safety practices, policies, and programs.

## **2.3 Supervisors**

Supervisors are responsible for implementing American Jewish University IIPP. This includes:

- Ensuring that workplaces and equipment are safe, well maintained, and in compliance with external agency regulations and American Jewish University policies, programs, and practices.
- Ensuring that workplace safety and health practices and procedures are clearly communicated and understood by employees through training programs.
- Enforcing health and safety rules fairly and uniformly relating to job performance.
- Evaluating employees on compliance with safe work practices.
- Acknowledging employees who make a significant contribution to maintenance of a safe workplace and disciplining employees who fail to follow safe work practices.
- Encouraging employees to report workplace hazards without fear of reprisals.
- Ensuring that periodic, scheduled workplace inspections are conducted and that identified health and safety deficiencies are corrected in a timely fashion.
- Ensuring that workplace incidents (injuries, exposures, or illnesses) are reported, investigated, and that corrective actions are taken promptly. See Sections 6.1 and 6.2 regarding procedures for reporting serious and non-serious incidents.
- Ensuring that inspections/investigations and employee health and safety records are kept for the designated period(s) of time.

## **2.4 Employees**

Employees are responsible for following the requirements of the IIPP. This involves:

- Keeping themselves informed of conditions affecting their health and safety.
- Participating in training programs as required.
- Adhering to healthy and safe practices in their workplace.
- Promptly reporting to their supervisors of potential hazards in the workplace and workplace incidents (injuries, exposures, or illnesses).

## **2.5 Human Resources Department**

The Human Resources Department is responsible for the development and administration of the IIPP.

This involves:

- Providing training and technical assistance to managers and supervisors on implementation of the IIPP.
- Assisting supervisors in conducting workplace hazard assessments to identify, evaluate, and correct hazards.
- Reviewing, updating and evaluating the overall effectiveness of the IIPP.

- Evaluating the adequacy and consistency of training designed by schools, departments, etc. (i.e., Tier 2 Training - See Section 8.2).

### **3.0 COMPLIANCE**

American Jewish University shall ensure that employees comply with safe and healthy work practices.

Managers and supervisors are responsible for establishing and maintaining good health and safety practices. To ensure compliance:

- Employees are recognized for following safe and healthful work practices (e.g., oral acknowledgments at receptions, certificates of appreciation, etc.).
- Employees are trained and retrained, as necessary or as required.
- Health and safety practices are integrated into new employee job descriptions and performance appraisals.
- Disciplinary actions with employees for failure to follow safe and healthful work practices are taken, when appropriate.
- An anti-reprisal policy for employees reporting safety and health concerns is enforced.

### **4.0 COMMUNICATION**

American Jewish University shall communicate with employees in a form readily understandable by all affected employees on matters related to occupational safety and health, including provisions designed to encourage employees to inform their supervisors of hazards at the worksite without fear of reprisal.

The various communication systems AJU uses to relay information to all employees on matters relating to occupational safety and health, include:

- The tri-tier training program
- Health and safety publications
- Health and safety meetings
- University Safety Partners
- Anonymous and confidential hazard reporting
- An anti-reprisal policy

These systems are described below:

#### **4.1 Training**

A tri-tier training program is an integral component of the communication system. The training program is described in Section 8.

#### **4.2 Health and Safety Publications**

Health and safety publications are available from Human Resources. Contact the Human Resources Office to request copies.

#### **4.3 Health and Safety Meetings**

Health and Safety meetings at the school, department or unit level are conducted to reinforce important concepts including, but not limited to the following:

- Clearly communicate health and safety programs and procedures to the employees and

students.

- Encourage employees and students to report workplace hazards to management without fear of reprisal as described in Section 4.6.
- Encourage employees and students to report workplace incidents (injuries, exposures, and illnesses).

#### **4.4 University Safety Partners**

- Represent the key departments and schools of the University.
- Communicate with respective departments about health and safety matters or to ensure the implementation of applicable Injury & Illness Prevention programs.
- Meet regularly to discuss campus-wide safety issues and to share safety concerns with Human Resources.

#### **4.5 Anonymous Hazard Reporting**

- To report a hazard or share a health and safety concern, employees may call (310) 440-1203, or ext. 1203, or submit a concern to the program administrator via email at [Kathy.Spira@aju.edu](mailto:Kathy.Spira@aju.edu)
- Hazard reporting may be done anonymously or confidentially.

#### **4.6 Anti-Reprisal Policy**

Employees and students shall not be discharged or discriminated against in any manner for bona fide reporting of health and safety hazards to American Jewish University or to appropriate governmental agencies. Supervisors shall inform employees and students of this policy and encourage reporting of workplace hazards to the management.

### **5.0 SCHEDULED AND PERIODIC INSPECTIONS**

American Jewish University shall have procedures for identifying and evaluating work place hazards, including scheduled periodic inspections to identify unsafe conditions and work practices. Supervisors are responsible for seeing that periodic inspections are conducted. To assist supervisors, Human Resources has developed self-inspection checklists that can be adapted for local use.

#### **5.1 Work Area Inspection Schedule for Supervisors**

Work area inspections shall be conducted according to the following schedule:

- Upon initial establishment of IIPP.
- Recommended frequency:
  - Office areas: Annually
  - Labs and Shops: Quarterly
- When new substances, processes, procedures or equipment which present potential new hazards are introduced.
- When new, previously unrecognized hazards are identified.
- When occupational injuries or illnesses occur.

#### **5.2 Internal Audit**

- To assist supervisors in identifying and correcting potential hazards, Human Resources conducts surveys (e.g., baseline occupational health and safety surveys of operating units, inspections of hazardous materials storage/disposal, fire safety).

- American Jewish University’s Senior Management Committee includes a review of the unit’s compliance with health and safety issues related to the implementation of this IIPP.

### **5.3 Outside Agencies**

Several outside agencies conduct regular, periodic inspections at AJU, which assist the University in achieving some of its inspectional responsibilities. These include:

- City of Los Angeles Fire Department
- County of Los Angeles Environmental Health Department
- County of Los Angeles Department of Building and Public Safety

### **5.4 Recordkeeping of Scheduled and Periodic Inspections**

Records of scheduled and periodic inspections to identify unsafe conditions and work practices shall be maintained by Human Resources for a minimum of one year (unless otherwise specified). The records shall include:

- The person(s) conducting the inspection,
- Any description of the unsafe conditions and work practices,
- The actions taken to correct the identified unsafe conditions and work practices.

## **6.0 INJURY AND ILLNESS REPORTING AND INVESTIGATION**

American Jewish University shall investigate workplace incidents (injuries exposures, or illnesses). The following standardized procedures for reporting and investigating workplace injuries, illnesses, and incidents are reviewed below.

### **6.1 Reporting Procedures**

Employees are to report workplace incidents (injuries, exposures, or illnesses) to their supervisor immediately.

#### **6.1.1 Serious Injuries/Illnesses or Fatalities**

- Supervisor immediately contacts the program administrator at (310) 440-1203, or ext. 1203, and via email at [Kathy.Spira@aju.edu](mailto:Kathy.Spira@aju.edu) to report work related death or serious injury/illness.
- Cal/OSHA defines an injury or illness as “serious” if it:
  - Requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation; or
  - An employee suffers a loss of any member of the body; or
  - An employee suffers any serious degree of permanent disfigurement.
- The Program administrator immediately reports any serious injury, illness, or fatality to CalOSHA. Other incidents may be reported on a case-by-case basis

#### **6.1.2 Standardized Forms**

Standardized forms for reporting and investigating workplace incidents (injuries, exposures, or illnesses) are available through Human Resources

### **6.2 Investigation Procedures**

Within 24 hours of occurrence, supervisors must investigate any workplace incident (injury, exposure, or illness) involving their staff and follow-up with corrective measures via completion of an incident report form.

### **6.2.1 Human Resources Review of Incidents:**

- All serious accidents (described in Section 6.1) and overexposures to chemical, biological, radiation, and physical stressors are investigated immediately by Human Resources as appropriate.
- For other incidents where additional follow-up is appropriate, Human Resources reviews submitted incident report information to help ensure adequate corrective actions have been identified and implemented.

## **7.0 HAZARD CORRECTION**

As established by California Occupational Health and Safety Administration (Cal-OSHA) regulations. American Jewish University is committed to correct unsafe or unhealthy work conditions in a timely manner, based on the severity of the hazards.

### **7.1 Schedules for Correcting Hazards**

Hazards shall be corrected according to the following procedures:

- When observed or discovered;
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, all exposed personnel will be removed from the area, except those necessary to correct the existing condition.
- Employees necessary to correct the hazardous condition shall be provided with necessary safeguards.

### **7.2 Recordkeeping**

- As corrective actions are implemented, supervisors shall document the effort and provide to Human Resources to maintain such record for at least one year.

### **7.3 Resources**

- Unsafe conditions that cannot be corrected with resources available to the supervisor or manager must be reported to the next higher level of management. Resources to correct hazards include the following:
  - Facilities - If the correction required is part of Facilities Operations maintenance responsibilities, Facilities will address the repair without charge to the department.
  - Departmental Funds - If the repair does not fall into the category of maintenance, departmental funds may be required.
  - School/University Funds- If departmental funds are not available, departments must seek other resources from the school or University.

## **8.0 TRAINING AND INSTRUCTION**

### **8.1 Training Content**

American Jewish University policy requires that faculty, staff and students shall be trained to protect themselves from hazards in their working environment. Supervisors shall train employees and students in:

- General health and safety practices;
- Job-specific health and safety practices and hazards;

- Recognition and assessment of health and safety risks;
- Minimization of risks through sound safety practices and use of protective equipment;
- Regulations and statutes applicable to their work; and,
- American Jewish University health and safety policies

## **8.2 Tri-Tier Training Program**

American Jewish University has organized its training system into a tri-tier program, which is described below:

- Tier 1: General Safety Training
  - General University orientation provided by Human Resources to all new employees.
  - Includes information on AJU's health and safety policies and practices, employee health and safety rights and responsibilities, health and safety services at AJU, what the employee should expect in terms of further training.
- Tier 2: Hazard-Specific Training
  - Provided by the school, Department or building safety representatives in conjunction with Human Resources to employees in labs, shops, or other workplaces where special hazards may be encountered.
  - Training topics include ergonomics, hazard communication, departmental emergency response/evacuation procedures, forklift safety,
  - Human Resources reviews Tier 2 Trainings for adequacy and consistency.
- Tier 3: Job-Specific Training
  - Provided by the supervisor for facilities staff, shop and food service workers, or other employees and students as appropriate.
  - Training consists of information specific to the hazards and equipment used by these individuals.
  - Training is communicated by one or more of the following methods: safety meetings (formal or informal), material safety data sheets, videos, pamphlets, booklets, and postings.

## **8.3 Training Schedule**

Training shall be provided to all employees:

- When the IIPP is first established;
- When new employees are hired;
- When employees are given new job assignments for which training has not previously been received;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever the employer is made aware of a new or previously unrecognized hazard;
- When employees become supervisors (so that they can familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed).

## **8.4 Training Resources from Human Resources**

- Human Resources assists schools and departments in providing health and safety training to employees on a variety of topics. These include IIPP training, laboratory safety training, respirator training, radiological safety, and many others.



## **8.5 Recordkeeping**

- Documentation of health and safety training for each employee shall include: (1) employee name or other identifier, (2) training dates, (3) type(s) of training, and (4) training providers. This documentation shall be maintained for one year.
- Training records of employees who have worked less than one year for the employer need not be retained beyond the term of employment if they are provided to the employee upon termination of employment.
- The supervisor is responsible for maintaining these records and providing them to Human Resources.

**ADDENDUM ATTACHED:**  
**Injury and Illness Prevention Program (IIPP) Addendum**  
**COVID-19 Infection Prevention Program**

**A. Company Policy**

American Jewish University is committed to preventing workplace hazards that could result in employee injury and/or illness; and to complying with all applicable state and local occupational health and safety regulations. The following Infection Prevention Program has been temporarily established to help make sure affected employees understand the dangers of COVID-19 and how to prevent spread of this disease in the workplace. Implementation of our COVID-19 Infection Prevention Program is consistent with our existing IIPP. This program applies to all locations where American Jewish University operates and is available for review by any employee.

**B. Employer Responsibilities**

American Jewish University follows measures below while *Shelter in Place*, *Stay at Home*, and/or *Employee Health Monitoring* orders recommended by the Centers for Disease Control and Prevention (CDC) and local authorities are in effect, as outlined by local public health department officials.

American Jewish University:

- Provides frequent employee training on COVID-19 signs, symptoms, and prevention in a language employees can understand
- Frequently cleans and disinfects used work surfaces based on current CDC guidelines
- Encourages additional spacing of employees to support safe social distancing
- Considers and, when possible, implements increased workplace ventilation, barriers, and employee work practices that reduce risk
- Monitors employee symptoms at the beginning of the shift and throughout the work day
- Encourages, when possible, alternative employee workplace options such as working from home

**C. Employee Training**

Management and supervisors ensure employees, prior to beginning of work assignment and regularly after, participate in COVID-19 training that covers the following topics:

- COVID-19 Infection Prevention Program (this program)
- COVID-19 and how it is spread-
- Symptoms of COVID-19 infection and when to seek medical attention
- Importance of not coming to work when ill
- Steps to prevent the spread of COVID-19 infection
- Importance of frequent hand washing / hand sanitizing
- Coughing and sneezing etiquette
- Importance of maintaining safe physical distancing-
- Safely using cleaners and disinfectants on surfaces and objects

All COVID-19-related employee training is documented.

**D. Employee Expectations**

Employees must adhere to following expectations:

- Stay at home when sick and avoid close contact with others
- Refrain from shaking hands, hugging, or touching others
- Clean surfaces before and after use in common areas, and when using shared equipment
- Avoid touching mouth, nose, and eyes
- Wash hands with soap and water for at least 30 seconds. Use hand sanitizer with at least 60% alcohol if soap and water are not available
- Wash/sanitize hands multiple times daily, including before and after work; during breaks; before and after eating; after coughing, sneezing, or blowing nose; and before and after going to the restroom
- Cover mouth and nose with a tissue when coughing or sneezing and immediately discard it after use and wash hands. If no tissues are available, cover mouth with shoulder or elbow and then wash hands
- Avoid sharing personal items with coworkers (e.g., food, dishes, lunch boxes, gloves, etc.)
- Keep a minimum distance of 6 feet from others when possible
- When choosing to cover mouth and nose with a cloth face covering, follow CDC and local health department guidelines on use, removal, cleaning, and disinfection

#### **E. Expectations to clean and disinfect the workplace**

American Jewish University has a routine schedule to clean and disinfect common surfaces, areas, and objects in the workplace in accordance with current CDC guidelines. This cleaning and disinfecting includes, but is not limited to:

- Work surfaces including tools, work stations, machinery, containers, counters, tables, chairs, benches, door handles, and knobs
- Handwashing areas and surfaces, including re-stocking with soap and paper towels
- Fixed and portable restrooms, including re-stocking toilet paper and cleaning and sanitizing as necessary
- Common areas including break room tables, chairs, drinking fountains, refrigerators, vending machines, and trash cans
- Contact areas on vehicles, forklifts, and other equipment such as stick shift, control levers, steering wheel, doors, seat belts, air conditioner, radio buttons, glove box, mirrors, armrests, and vehicle keys

Disinfection procedures adhere to CDC guidelines. Employees assigned to sanitize and disinfect surfaces are trained on hazards and manufacturer's recommended safety precautions of all cleaners and disinfectants. Employees assigned to perform sanitation and disinfection are expected to use cleaners and disinfectants in a safe manner, follow label directions, and wear proper personal protective equipment.

#### **F. Social Distancing**

American Jewish University practices social distancing of at least 6 feet of separation to the extent possible in all work areas including outdoors, vehicles, structures, facilities, and offices. This includes:

- Before work shift
- While working
- After work shift
- Coming and going from vehicles
- Entering, working, and exiting buildings and structures
- During breaks and lunch periods

- When performing work activities, including use of tool and equipment

Access to American Jewish University property and/or facilities is limited to employees. Vendors and other non-employee visitors must adhere to the following expectations:

- Vendors must be approved before arriving. Sick individuals will not be allowed to access the property
- Personal interaction with vendors and other non-employees is limited to the extent possible
- Visitors who must enter the facility are expected to follow hygiene and social distancing practices outlined in section D. Employee Expectations
- To the extent possible, outside deliveries are dropped off at a designated area away from employees and high-traffic areas.

### **G. Symptomatic and Sick Employees**

American Jewish University stresses the importance of employees staying home if either they or anyone they live with is sick. The following steps are followed to-monitor employee health:

- **Employee Health Monitoring**

Human Resources monitors employee attendance and watches for employees showing COVID-19 symptoms. Our procedures for health monitoring include:

1. Observation of employees when they arrive at work and inquiry to learn if they have experienced fever, cough, or difficulty breathing according to local public health department guidelines
  - If ill, employee is sent home immediately and instructed to contact a medical professional by phone before going to a medical facility
2. Monitoring employees throughout the day:
  - Employees who develop COVID-19 or other flu-like symptoms at work are sent home immediately
  - Sick employees are instructed to follow CDC guidelines and local public health department recommendations

- **If an employee tests positive for COVID-19 infection:**

American Jewish University follows guidelines below when informed an employee is diagnosed with COVID-19 infection:

1. Clean and disinfect applicable work areas immediately following CDC guidelines using proper disinfection procedures and appropriate personal protective equipment
2. Document infected employee's work location, work hours, and general and specific work duties. If the employee recently traveled to multiple worksites, document their travel times and last day worked
3. Identify and confidentially contact anyone who had contact with symptomatic employee
4. Contact local public health department and follow their recommended protocols.

### **H. Program Evaluation**

American Jewish University:

- Conducts daily workplace inspections to ensure COVID-19 Infection Prevention Program procedures are followed
- Takes corrective action to correct any deficiencies discovered
- Documents corrective actions

- Ensures CDC, local health department, and other applicable authorities' guidelines are incorporated into the COVID-19 Infection Prevention Program and followed

### **I. Employee Housing**

Employees living in company provided housing follow expectations outlined in COVID-19 Infection Prevention Program sections D., E. and F. including:

- Practice social distancing and follow "shelter in place" recommendations
- Follow company expectations on household hygiene and housekeeping
- Wash hands frequently and disinfect surfaces touched when sharing common areas
- Refrain from shaking hands, hugging, or touching others
- Limit games, group fitness activities, parties, and other social gatherings that don't follow social distancing guidelines
- Limit running errands or shopping trips

Academic Affairs consults with local public health departments for specific expectations and guidelines for sick employees residing in employee housing. When necessary, separate housing is arranged for sick employees.