

## **PROGRESS REPORT: OPERATIONS REVIEW AND AUDIT ON OCCUPATIONAL HEALTH AND SAFETY TRAINING FOR UW SYSTEM EMPLOYEES**

### **EXECUTIVE SUMMARY**

#### **BACKGROUND**

The follow-up review from Operations Review and Audit identified a list of recommendations for improvement in the following areas:

- Training administration
- Promotion of a safety culture
- Systemwide coordination

Currently, occupational health and safety training for UW System employees has the following features:

- Safety training is done locally, at each campus.
- Sometimes training is centralized through a campus safety manager, or it may be decentralized with some training organized at the departmental level.
- There does not exist a central electronic system that allows tracking of health and safety training for UW System employees.
- Supervisors vary in their vigilance in ensuring that employees have met training requirements.
- Campus safety departments are frequently staffed by one person and manage a broad array of responsibilities [see Attachment A].

This report provides a plan for responding to the audit. Recommendations fall into two categories: operational and cultural. The operational recommendations involve specific tasks and resources, and offer clear-cut alternatives for decision and action. The cultural recommendations will tend to require solutions that are long-term in scope, and include an accountability component that touches on areas much broader than workplace safety. This accountability component in particular will require leadership, participation, and buy-in across the campus organization.

The opinions of the UW System Risk Management Council were sought out and incorporated into this follow-up. The Risk Management Council consists of safety/risk managers from three campuses and the Office of Safety and Loss Prevention (OSLP), and provides the perspective of campus safety and risk managers on many important issues.

#### **REQUESTED ACTION**

For information only

## DISCUSSION

### Training Administration

#### **Review occupational health and safety training regulations to identify training needs.**

##### Key stakeholders

Campus occupational safety managers, risk managers, other environmental health & safety (EH&S) staff, first line supervisors, Office of Safety and Loss Prevention.

##### Plan outline

Occupational safety managers have reviewed regulations and identified general industry and other known training needs required by regulations and standards. [See Attachment B.] The Office of Safety and Loss Prevention at UW System Administration has processes in place to identify new general regulations in the environmental health and safety area that apply to general campus operations. Departments or campuses with highly specialized activities need to maintain or implement processes to identify new regulatory requirements applicable to their operations.

#### **Develop a plan to prioritize and meet training requirements.**

##### Key stakeholders

Key stakeholder is management, from academic and administrative departmental management down to first-line supervisors. Other stakeholders include campus safety managers.

##### Plan outline

As noted in the audit, UW System institutions have varying levels of health and safety training programs in operation. To implement a robust training program, UW System institutions would plan for the following:

- Identify the training needs for the campus, based on its personnel and programmatic health and safety exposures [see Attachment B for required and recommended training]
- Determine resources/budget to meet training needs
- Select the most efficient methods of delivery for each training and target audience
- Assess program effectiveness and correct deficiencies

#### **Assure that there are procedures in place to identify and refer employees to required training. Assure that all training is properly documented.**

Due to the complexity of the health and safety environment in higher education, UW System employees require individual training profiles to address their work exposures. The UW System institutions currently do not have an electronic system that allows development and tracking of individual training profiles. Successful training administration depends on the availability of an

integrated and comprehensive tracking system. This tracking system could be used in other program areas that need to track training for individual employees.

#### Key stakeholders

The human resources department and the information technology department are the key stakeholders. Other stakeholders include supervisors, employees, academic and administrative department management, and safety managers.

#### Plan outline

There are two phases to this issue.

1. Implement or develop a system that can address the training administration and tracking needs of the UW System.
2. Create and document a training profile for each current employee and job position, contingent on the development and implementation of a UW System training administration system.

### **Promoting a Safety-Oriented Culture**

**Promote a safety-oriented culture that seeks to exceed minimum standards outlined in health and safety regulations by: 1) promoting employee involvement in health and safety activities, and 2) developing supervisor accountability systems that promote workplace safety.**

According to Occupational Health and Safety Association (OSHA), a strong safety and health culture is the result of:

- Positive workplace attitudes
- Involvement and buy-in of all members of the workforce
- Mutual, meaningful, and measurable safety and health improvement goals
- Policies and procedures that serve as reference tools, rather than obscure rules
- Personnel training at all levels within the organization
- Responsibility and accountability throughout the organization

In 1994, the Board of Regents adopted by resolution the UW System Written Health and Safety Program Plan (See Attachment C) which incorporated many of the elements critical to promoting a safety oriented culture. These include:

- Written mission statement
- Written performance/accountability standards and objectives for managers and supervisors
- Recordkeeping
- Health and safety training and education
- Periodic health and safety inspections/surveys
- Accident investigations
- Worker's compensation claims management and return to work programs

The successful long term promotion of a safety oriented culture requires the creation of a solid foundation. This foundation should be based upon adherence to regulations, policy, and best practices for occupational health and safety.

#### Key Stakeholders

UW System Board of Regents, Campus and System Administration Senior Management are essential for the success of this component. Other stakeholders include academic and administrative department management, supervisors, union leadership, and employees.

#### Plan Outline

Convene a cross-functional team consisting of senior management from academic and business services to review and update the 1994 health and safety plan. The revised plan will serve as a road map toward a UW System safety oriented culture.

### **Systemwide Coordination**

#### **Establish a formal consortium or consortia for developing and delivering safety training.**

##### Key stakeholders

UW System Administration, UW System Risk Management Council, campus safety managers, and safety specialists.

##### Plan outline

The consortium has been formed as a cooperative effort among UW System institutions, with no funding resources.

UW System Administration staff felt that guidance and general direction of the activities of the consortium would be best served with direction from campus safety managers. The UW System Risk Management Council is organized and well-suited for this task, and has agreed to provide this guidance function for consortium activities. Anticipated challenges for the consortium include: funding for development, delivery and training contractors, and long-term commitment of consortium representatives.

UW System Administration is meeting with Wisconsin Technical College System (WTCS) risk management staff to identify cooperative training and loss control efforts.

### **Summary**

The UW System Administration strongly supports the goals of these recommendations including convening a cross-functional team comprised of senior management to review and update the 1994 Board of Regents Written Health and Safety Plan. The UW System is committed to implementing these recommendations in as timely a fashion as funding and staffing resources allow.

The successful administration of occupational safety training will be achieved through the application of management attention, supported by the installation and proper use of an employee training database and reporting tool. Those two items are critical—with those in place, other key aspects such as supervisor and employee participation, or appropriate training content and delivery, can be readily managed. Cooperative efforts, such as the training consortium, might assist with specialty content, different delivery methods, or content variety.

The establishment and maintenance of a stronger safety culture within UW System campuses should have at its foundation a functional occupational safety and health program. Each campus will need to adopt a program and management procedures that work best for their campus. OSHA's Safety and Health Program Management Guidelines offer a framework of the most important program elements. Other universities that have achieved distinction for their safety and health programs can be used as models. These long term efforts will require a high degree of commitment that could be obtained through continued Board of Regents attention or policy.

#### **RELATED REGENT POLICIES**

None

## Attachment A — Typical scope of duties for campus occupational safety department

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### Background

Campus safety departments (often, this is one person) are frequently responsible for providing support services to the campuses in a variety of areas. Often these include risk management, occupational safety, environmental affairs, property/casualty and worker's compensation claims. At the UW System level, the Office of Safety and Loss Prevention (OSLP) provides support to the campuses in those areas.

Systemwide figures that illustrate program scope include:

- total insurable value of \$13 billion in property assets
- worker's compensation program covers 30,000 employees
- strives to ensure a safe learning environment for 170,000 students and countless visitors
- manage programs with annual premiums of:
  - \$4.8 million in worker's compensation,
  - \$4.4 million in property insurance and
  - \$2 million in general liability and medical malpractice premiums.

### Occupational Health & Safety and Environmental Affairs

Areas of employee safety and health, and environmental management are all driven by multiple and complex state and federal regulations. These regulations are overseen by a number of state and federal agencies.

For many functions, campus safety and environmental staff have primary responsibility for program management. For other functions, they provide consulting and technical expertise to campus departments.

Some functions that need to be managed include:

- employee training
- recordkeeping
- written programs
- safety inspections
- accident investigations
- industrial hygiene surveys
- safety equipment recommendations
- regulatory code assistance
- hazard prevention guidance

### Worker's Compensation Program

UW System is delegated by the State Department of Administration to manage worker's compensation cases. Campus staff coordinate injury reporting, facilitate supervisor involvement during claim investigations and initiate return to work options where appropriate. Campus and OSLP staff work closely on all claims to ensure their effective management. UW System adjusts about 1,200 claims each year.

### Liability Program

Campus staff have responsibility for liability program management, including but not limited to:

- contract review for insurance requirements
- development of master affiliation agreements for student internships
- tenant user liability programs for special events
- domestic and international health insurance for students
- liability protection for student academic pursuits
- student organizations
- driving and fleet issues
- sponsored camps and clinics

### Property Program

Campus staff, in conjunction with OSLP, manage and maintain the property inventory for UW System. This vast and complicated property program includes the asset management of buildings, contents including libraries and special collections, foreign property, and business interruption.

Attachment B — Required and Recommended Training Summary

**Required & Recommended Environmental Health and Safety Training Summary**

Note: The need for the following training should be determined by first conducting a job safety analysis.

Type of Activity/Training	Legal Authority (Regulation)*	Who Receives	How Often
Accident Prevention Signs/Tags <input type="checkbox"/>	<u>OSHA 1910.145(c)(1)(ii), (2)(ii) and (3)</u>	All employees <input type="checkbox"/>	Initial/Periodic <input type="checkbox"/>
Asbestos Awareness Course	<u>OSHA 1910.1001(j)(7)(iv)</u>	Maintenance/custodial employees who perform housekeeping operations in an area which contains ACM or PACM. General Industry work. Note 2 hour construction class (below) will satisfy this requirement.	Initial/Annual Refresher
Asbestos Two-Hour Class IV work related to construction activities.	<u>OSHA 1926.1101(k)(9)(vi) &amp; 40 CFR 763.92(a)(2)</u>	Maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste and debris resulting from Class I, II, and III construction activities.	Initial/Annual Refresher
Asbestos 16 Hour - Class III work related to construction activities.	<u>OSHA 1926.1101(k)(9)(v) &amp; 40 CFR 763.92(a)(2)</u>	Work by authorized and assigned Maintenance personnel related to repair and maintenance operations, where "ACM", including TSI and surfacing ACM and PACM, is likely to be disturbed.	Initial/Annual Refresher
Bloodborne Pathogens	OSHA <u>1910.1030(g)(2)</u>	Employees reasonably anticipated to have occupational exposure to blood or other potentially infectious materials (i.e. responders, custodians, etc).	Initial/Annual Refresher
Compressed Gases	OSHA <u>1910.101</u>	Employees who handle and work with compressed gases.	Initial/Periodic

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Type of Activity/Training	Legal Authority (Regulation)*	Who Receives	How Often
Confined Space Entry with basic first aid and adult cardiopulmonary resuscitation (AED training recommended inclusion).	OSHA <u>1910.146(q)</u>  WI Department of Commerce <u>32.29 and 32.29</u>	<ul style="list-style-type: none"> <li>• Authorized <u>permit required</u> confined space entrants/attendants, supervisors &amp; rescue personnel.</li> <li>• Note: Permit space rescuers require additional training and shall practice rescues annually. Note – Stevens Point Fire Department serves as UWSP rescue.</li> </ul>	Initial/ Periodic/
Cranes, Derricks. - Overhead and gantry cranes; Crawler locomotive and truck cranes.	OSHA <u>1910.178(l)</u> ; OSHA <u>1910.180(i)(5)(ii)</u>	Employees involved with crane/derrick operations. Operators of overhead and gantry cranes. Operators of cranes.	Initial/Periodic
DRIVER – 15 Passenger Van	State of WI, DOA and UWSA, UWSP Policy.	All drivers of 12/15 passenger vans.	Initial/Periodic
DRIVER – Defensive Driving	Available	Automobile drivers on UWSP business	Initial/Periodic
Electrical Safety	OSHA, <u>1910.332(b)(1)</u> <u>1910.269</u>	Blue collar supervisors, electrical and electronic engineers, electrical and electronic equipment assemblers, electrical and electronic technicians, electricians, industrial machine operators, material handling equipment operators, mechanics and repairers, painters, riggers and roustabouts, stationary engineers, and welders and any other employee working with electrical equipment	Initial/Periodic☐



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Type of Activity/Training	Legal Authority (Regulation)*	Who Receives	How Often
Emergency Action / Means of Egress / Fire Prevention (Emergency Management Plan)	OSHA <u>1910.38(a)(5)(i), (ii)(a) through (c) and (iii); 1910.38(b)(4)(i) and (ii)</u>	All employees.	Initial/Periodic
Ergonomics - office ergonomics, industrial ergonomics, lifting safety, body mechanics, etc.	Recommended - Not Required by Standard.	As applicable. Depending on position. Work with EHS to assist in assessing needs.	Initial/Periodic
Employee Rights/Responsibilities.	<u>WI State Statute 101.055</u>	All employees informed.	Upon Hire
Fall Protection - General Maintenance	<u>1910.23, 1910 Subpart D, 1910.132 (a), and, Section 5 (a)</u>	Individuals exposed to unprotected areas where there can be falls greater than four feet and those who would be required to wear fall protection equipment.	Initial/Periodic
Fall Protection - Construction Activities	<u>1926.503; 1926.501</u>	Individuals involved in construction activities exposed to falls greater than six feet. Those that would be required to wear fall protection equipment.	Initial/Periodic
Fire Extinguishers	OSHA <u>1910.157</u>	Designated employees. For designated individuals required/requested to utilize a fire extinguisher as part of their job.	Initial/Annual Refresher
Fire Extinguishing systems, employee alarm systems, fire detection systems.	OSHA <u>1910 Subpart L - Fire Protection</u>	For employees responsible for maintenance and/or repair of these systems (related to OSHA required systems).	Initial/Periodic
First Aid/Medical Services	<u>1910.151(b)</u>	In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid.	Initial/Annual Refresher

Attachment B — Required and Recommended Training Summary

Type of Activity/Training	Legal Authority (Regulation)*	Who Receives	How Often
First Aid/CPR/AED	Required in certain job descriptions.	As required by individual departments (i.e. Lifeguards, Security, Camp personnel, Protective Services, etc.).	Initial/Annual Refresher
Flammable /Combustible Liquids <input type="checkbox"/>	OSHA, <u>1910.106(b)(5)(vi)(v)(2) &amp; (3)</u>	Flammable liquid station operators and other applicable employees who work with flammable liquid tanks.	Initial/Periodic <input type="checkbox"/>
Formaldehyde <input type="checkbox"/>	OSHA, <u>1910.1048(n)</u>	All employees who are assigned to workplaces where there is exposure to formaldehyde participate in a training program, except that where the employer can show, using objective data, that employees are not exposed to formaldehyde at or above 0.1 ppm, the employer is not required to provide training.	Initial/Annual Refresher
Hazard Communication	OSHA, <u>1910.1200(h)</u>	All employees exposed to hazardous chemicals.	Initial/Periodic
Hazardous Material (DOT)	DOT, <u>49 CFR 172.704</u>	All HazMat Employees (those handling hazardous materials). Employees involved in the shipment or receiving of hazardous materials in transit.	Initial & Refresher every 3 years
Hazardous Material Emergency Release Response			
<ul style="list-style-type: none"> <li>HAZWOPER Awareness Level</li> </ul>	OSHA 1910.120 (g)	Individuals who are likely to witness or discover a hazardous substance release. THIS TRAINING IS COVERED IN EMERGENCY ACTION TRAINING and SPCC.	Initial/Annual Refresher

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Type of Activity/Training	Legal Authority (Regulation)*	Who Receives	How Often
<ul style="list-style-type: none"> <li>HAZWOPER First responder operations level.</li> </ul>	OSHA 1910.120 (g)	Individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release or clean it up.	Initial/Annual Refresher
<ul style="list-style-type: none"> <li>HAZWOPER Hazardous materials technician.</li> </ul>	OSHA 1910.120 (g)	Personnel expected to respond to uncontrolled emergency spills. Hazardous materials technicians are individuals who respond to releases or potential releases for the purpose of stopping the release. Nuisance spills, minor releases, etc. which are not emergencies should be handled under Hazard Communication training.	Initial/Annual Refresher
<ul style="list-style-type: none"> <li>HAZWOPER Hazardous materials specialist.</li> </ul>	OSHA 1910.120 (g)	Hazardous materials specialists are individuals who respond with and provide support to hazardous materials technicians.	Initial/Annual Refresher
<ul style="list-style-type: none"> <li>HAZWOPER On scene incident commander.</li> </ul>	OSHA 1910.120 (g)	Incident commanders, who will assume control of the incident scene beyond the first responder awareness level.	Initial/Annual Refresher
Hazardous Waste ☐	EPA / WI DNR, <u>NR 664</u> (via NR 662 )	Employees involved in the generation, accumulation, storage, spill response, handling, labeling, shipping, or management of any hazardous waste.	Initial/Annual Refresher
Hoists – material & personnel and elevators ☐	OSHA, <u>1926 Subpart N</u> ☐	Affected employees using this equipment.	Initial/Periodic

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Type of Activity/Training	Legal Authority (Regulation)*	Who Receives	How Often
Laundry Machines	OSHA 1910.264(d)(1)(v)	Laundry Machine operators - Employees shall be properly instructed as to the hazards of their work and be instructed in safe practices, by bulletins, printed rules, and verbal instructions.	Initial/Periodic
Lead Awareness	OSHA 1910.1025(l)(1)(i)	Employees who may have potential for lead exposure such as maintenance custodial individuals. Note: exposure above lead action level requires further training, but is not applicable at UWSP.	Initial/Periodic
Lead Construction/Remodeling Activities	OSHA 1926.62(l)	Individuals involved in construction activities where lead could be disturbed or individuals removing incidental amounts of lead. Note: exposure above lead action level requires further training, but is not applicable at UWSP.	Initial/Annual Refresher
Liquefied Petroleum (LP) Gases	OSHA 1910.110(b)(16)	Individuals using/handling LPG tanks.	Initial/Periodic
Lockout/Tagout Authorized	1910.147(c)(7)(i)(A)	A person who locks out or tags out machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes an authorized employee when that employee's duties include performing servicing or maintenance covered under this section.	Initial/Periodic
Lockout/Tagout Affected	OSHA 1910.147(c)(7)(i)(B)	An employee whose job requires him/her to operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed.	Initial/Periodic
Lockout/Tagout Awareness	OSHA 1910.147(c)(7)(i)(C)	All employees. Conducted in NEO Safety Training	Initial

Attachment B — Required and Recommended Training Summary

Type of Activity/Training	Legal Authority (Regulation)*	Who Receives	How Often
Logging Operations	OSHA 1910.266(i)(1) and (2)(i) through (iv); (3)(i) through (vi); (4) and (5)(i) through (iv); (6) and (7)(i) through (iii); (8) and (9)	All employees involved in covered logging operations.	Initial/Periodic
New Employee Safety Training and Department Specific Safety Procedures	Covers various standards and includes various EHS training topics	All Employees. Includes awareness level training on many of the topics list in this spreadsheet, such as Hazard Communication, Emergency Action, LOTO Awareness, BBP Awareness, CSE Awareness, Fire Extinguisher, PPE, Accident Reporting, etc.	Initial
Occupational Exposure to Hazardous Chemicals in Labs	1910.1450(f)	All employees who work with hazardous chemicals in laboratory settings	Initial/Periodic
Occupational Noise Exposure	1910.95(k) & 1910.95(i)(4)	All employees who are exposed to noise at or above an 8-hour time-weighted average of 85 decibels.	Initial/Annual Refresher
Occupational Noise Exposure Awareness	Recommended – Not required by standard.	Recommended for Maintenance/Custodial and others in higher noise level work areas.	Initial
Personal Protective Equipment	OSHA, 1910.132(f)(1)(i) through (v); (2), (3)(i) through (iii) and (4)	All employees required to wear any personal protection equipment. Note: certain types of PPE have specific training requirements, i.e. respirators.	Prior to Initial Use / Periodic.
Powered Industrial Trucks	OSHA 1910.178(l)	Operators of powered industrial trucks (i.e. forklifts, other)	Initial/Three Year Evaluation/Periodic and/or if the operator is in an accident or changes occur in the workplace or type of truck used.

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Type of Activity/Training	Legal Authority (Regulation)*	Who Receives	How Often
Powered Platforms, Aerial Lifts (Bucket Lifts), Vehicle Mounted Work Platforms.			
<ul style="list-style-type: none"> <li>Powered platforms for building maintenance</li> </ul>	1910.66(i)(1) & Appendix C	Operators of powered platforms	Initial/Periodic
<ul style="list-style-type: none"> <li>Vehicle-mounted elevating &amp; rotating work platforms. Aerial Lifts. Bucket Lifts</li> </ul>	1910.67(c)(2)(ii)	Operators of powered platforms/Ariel lifts	Initial/Periodic
<ul style="list-style-type: none"> <li>Manlifts.</li> </ul>	1910.68(b)(1)	Operators of manlifts	Initial/Periodic
Powered Tools	Recommended. Possibly <u>General Duty Clause, Section 5(a)(1) OSH Act</u>	All employees who work with powered tools	Initial/Refresher
Radiation, Ionizing	<u>1910.1096(f)(3)(viii) &amp; 1910.1096(i)(2)</u>	Employees working in any area where ionizing radiation exposure levels are present above set levels.	Initial/Periodic
Radiation Workers (NRC)	NRC 10 CFR 19.12	Apply to all persons who receive, possess, use, or transfer material licensed by the Nuclear Regulatory Commission	Initial/Periodic
Respiratory Protection	OSHA, <u>1910.134(k)</u>	Individuals wearing an air purifying respirator, supplied air respirator, or self-contained apparatus.	Initial/Annual Refresher
Respiratory Protection - Voluntary Filtering Face Piece (Dust Mask) Use	OSHA <u>1910.134(c)(2)(ii)</u> <u>1910.134 appendix D</u>	Individuals voluntarily wearing a filtering facepiece (non-mandatory/below PEL use)	Initial/Periodic

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Type of Activity/Training	Legal Authority (Regulation)*	Who Receives	How Often
Scaffolding	OSHA <u>1926.454(a)(1); (5) and (b)(1) through (4) and (c)(1)</u>	All employees who work on scaffolds. Each employee who performs work while on a scaffold in a construction related activity. Individuals using scaffolds for general maintenance should also receive appropriate training. This also includes individuals working scissor lifts.	Initial/Periodic
Servicing of Single and Multi-Piece Rim Wheels	OSHA, <u>1910.177(c)</u>	Employees servicing Multi-Piece and Single-Piece Rim Wheels	Initial/Periodic
Spill Prevention, Control, and Countermeasures	<u>40 CFR 112 &amp; WI's Spill Law 292.11</u> ; 40 CFR 112.7(f)	Employees handling oil (including used vegetable oil). Discharge Prevention Briefings	Initial / Annual Refresher
Supervisory EHS Overview Training	Recommended - Not Required by Standard.	For UWSP Supervisors to provide them overview of Environmental Health and Safety requirements related to their position and responsibilities. Including accident investigation/reporting, OSHA requirements, EPA/DNR requirements, Worker Compensation, etc.	Initial
Telecommunications	<u>1910.268</u>	For employees that work directly on "telecommunications centers" and at telecommunications "field installations"	Initial/Periodic

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Type of Activity/Training	Legal Authority (Regulation)*	Who Receives	How Often
Toxic and Hazardous Substances	OSHA <u>1910 Subpart Z - Toxic and Hazardous Substances</u>	Individuals exposed to various specific hazardous substances listed in 1910 Subpart Z (i.e. Formaldehyde, Inorganic arsenic, etc) above the set action level or PEL. Note: certain items may be already listed above (i.e. BBP). The remaining items in 1910 Subpart Z will depend on the extent a listed substance is used in a specific area. Need to determine on case-by-case basis. Review with EHS as needed.	Initial/Annual or Quarterly (for some). Review with EHS to determine applicability.
Trenching/Excavations	OSHA <u>1926.650, 1926.651, 1926.652</u>	Individuals working in trenching/excavations or supervising, designing this work.	Initial/Periodic
Ventilation (Personal Protection, Open Surface Tanks)	OSHA, <u>1910.94</u> □	Employees working around open surface tanks.	Initial/Periodic
Welding, Cutting, Brazing	OSHA, <u>1910 Subpart Q: 1910.252(a)(2)(xiii)(C); 1910.253(a)(4); 1910.254(a)(3); 1910.255(a)(3)</u>	All employees who perform welding/cutting operations	Initial/Periodic
Working and Walking Surfaces	OSHA, <u>1910 Subpart D</u>	All exposed workers. Dependent on position. No specific training requirements in Subpart D, however recommended ladder safety, others as applicable to position.	Initial/Periodic Change in worksite/equipment



## Attachment B — Required and Recommended Training Summary

Type of Activity/Training	Legal Authority (Regulation)*	Who Receives	How Often
General Safety training issues not covered above, but would be viewed as a general duty to provide (i.e. trained in use of powered tool, specific department hazards, etc.), that are specific to an individual position.	<u>General Duty Clause, Section 5(a)(1) OSH Act</u>	As applicable	<b>As applicable.</b>

### Notes:

1. The above are typical training requirements, however not all safety and environmental training topics are listed. Individual jobs may require additional and/or more specific training. Basic safety training for all tasks must be an integrated aspect of department's everyday operations. Contact the campus safety department for assistance in determining training requirements. A job safety analysis should be performed to assist with this assessment.
2. Training in the "How Often" Column which is in **bold** print is required by the Standard (as listed).
3. The term **periodic training** generally means refresher training that is needed when job procedures/policy, equipment, processes, chemicals, hazards, duties, responsibilities, or other aspects affecting the safety of the job/employee change or it is determined employees are deficient in the understanding/skill level required for the job and thus employees must be updated. Periodic training may also be requested by the supervisor or directed by management. Supervisors must be reviewing their need for periodic training and ensuring their employees receive it appropriately.
4. Annual refresher training is training that is a **REQUIRED** annual (or as stated frequency) event per the listed standard. This is done in order to maintain the understanding/skill level required by most performance-based standards. The refresher does not need to necessarily be the full class, but a review of the basics and necessary updates.
5. Recommended training, such as ergonomics and material handling, should be conducted periodically to help reduce injuries and increase efficiency. Supervisors may work with the safety department to determine proper course offerings or customize as necessary.
6. Supervisors are responsible for ensuring their employees are trained in all applicable topics and for maintaining training documentation for their employees.
7. It is critical that all training be documented with name of course, content, instructor, date, and signature of attendees.

### References:

1. OSHA - <http://www.osha.gov/Publications/osh2254.pdf>
2. [Wisconsin Department of Risk Management](#).

**Attachment C**

**UNIVERSITY OF WISCONSIN SYSTEM  
WRITTEN HEALTH AND SAFETY PROGRAM**

## **UNIVERSITY OF WISCONSIN SYSTEM WRITTEN HEALTH AND SAFETY PROGRAM**

### **EXECUTIVE SUMMARY**

#### **BACKGROUND**

The University of Wisconsin System has had a long-standing commitment to provide a healthy and safe working environment for its faculty, staff and students. The respective functions of environmental health and safety, risk management and workers compensation claims management have been operational for a number of years at many of the campuses and in System Administration. Recently, these functions at the System Administration level have been consolidated into one office of "Safety and Loss Prevention" to enable us to undertake a more proactive program to address our responsibilities and reduce our costs.

Our efforts in this arena were reinforced when in July of 1993, Governor Thompson issued Executive Order #194 which requires a written Health and Safety Program Plan be prepared by each agency, campus and institution. This order encouraged and reaffirmed the direction of UW System efforts in loss prevention.

The attached written program is an extension of work already underway to preserve and protect UW System resources. It identifies 13 work activities which parallel the elements required in Executive Order 194 and represents a composite of those initiatives deemed necessary to enhance our progress in achieving an effective loss prevention program.

As with any continuous quality improvement process, our written program and future initiatives must necessarily be dynamic. The inevitable adoption of new regulatory standards, rising medical and claims costs, and shrinking resources will compel us to evaluate innovative approaches through the strategic planning process to address these challenges. The elements addressed in the written program will serve as a benchmark by which we can measure our progress and adjust priorities accordingly to meet the needs of our customers.

#### **REQUESTED ACTION**

Approval of Resolution I.3.H. adopting the University of Wisconsin System's written health and safety program, developed in response to the Governor's Executive Order #194.

## **DISCUSSION AND RECOMMENDATIONS**

### **Resolution I.3.H.: Adoption of the University of Wisconsin System's Written Health and Safety Program Plan**

Adoption of the Written Health and Safety Program Plan, by approval of Resolution I.3.H., would provide for the following:

- Continued support for campus autonomy to manage loss prevention programs at the local level.
- Campus alliance with System Administration staff to provide for coordination of loss prevention initiatives.
- On-going technical consultation to guide campus staff in their efforts to maintain health, safety and environmental compliance.

### **RELATED REGENT POLICIES**

There are no formal Board of Regents policies relating directly to this subject.

## **UNIVERSITY OF WISCONSIN SYSTEM WRITTEN HEALTH AND SAFETY PROGRAM**

### **INTRODUCTION**

The following "Written Health and Safety Program" was developed in response to the Governor's Executive Order #194, which is attached in Appendix I.

This Program provides the outline for complying with the Executive Order which mandates that each campus must develop and promulgate a comprehensive written health and safety program and action plans. UW System Administration negotiated with the Department of Administration (DOA) to accept this written program on behalf of all campuses to serve as a guide for further developments. Each campus is charged with developing and implementing specific action plans based on its priorities.

### **PROGRAM ELEMENTS**

There are thirteen required elements contained in the nine-point executive order. This program identifies each of those required elements and describes the initial steps taken to address them. This program should be regarded as an evolutionary process that will be refined continuously as program elements are further developed.

#### **PROGRAM ELEMENT I:           *Mission Statement***

It is the goal of the UW System to provide a safe and healthful higher education environment for faculty, staff, students, and persons utilizing UW System programs and using UW System facilities.

We strive to meet this goal with:

- proactive loss prevention, health, safety, and environmental management;
- quality claims management;
- protection of UW System assets.

No job or course of academic study is so important and no request so urgent that one cannot take time to perform that function safely and in compliance with overall environmental regulation.

Throughout the UW System, the respective functions of Worker's Compensation, Environmental and Occupational Health and Safety, and Risk Management should coordinate to provide comprehensive technical and responsive service.

Faculty, management, and supervisors are responsible for demonstrating leadership in developing proper attitudes toward environmental health and safety, and providing necessary resources to conduct activities safely and ensure environmental compliance.

Employees and students are responsible for the continuous practice of safety while performing their duties. This requires cooperation with all aspects of environmental health, safety, and risk management

policies and guidelines.

**PROGRAM ELEMENT II.      *Written performance/accountability standards and objectives for managers and supervisors to reduce occupational injuries and illnesses and enhance workplace health and safety***

- A.      Where campuses have their action plans underway, professional outside consultation is being brought in to conduct supervisor safety training.
- B.      UW System Administration staff have requested that DOA staff take a leadership role on behalf of all state agencies in working with the Department of Employment Relations to incorporate safety responsibilities in supervisory training and position descriptions. With that as a foundation, UW System Administration staff can develop a framework within which UW System institutions can achieve this goal.

**PROGRAM ELEMENT III.      *Recordkeeping for Safety and Health Compliance Activities and Programs***

- A.      The UW System Administration Office of Safety and Loss Prevention staff coordinate the development and maintenance of policy manuals (Environmental Health and Safety, Risk Management, and Worker's Compensation) which address specific regulatory areas. All required records and reports are identified and described in those manuals.
- B.      DOA's Worker's Compensation Computer System will satisfy agency requirements for OSHA 200 compliance.
- C.      UW System Environmental Health and Safety staff meet regularly with Department of Industry, Labor and Human Relations staff to keep current with their regulations, inspection priorities, and to convey consistent interpretations to UW System campuses and institutions.
- D.      Compliance activity priorities are based on various factors including safety data trends or rates of citations indicating areas that need attention.

**PROGRAM ELEMENT IV.      *Designated Agency Health and Safety Coordinators***

- A.      The UW System Administration has designated its Environmental Health and Safety Manager (EH&S) as the agency-level coordinator.
- B.      Each UW System Institution has designated an EH&S Manager and an Occupational Safety Manager. In most cases, these responsibilities are assigned to the same individual. The names are available upon request.

**PROGRAM ELEMENT V.      *Establish Health and Safety Committees***

- A.      The UW System Administration has developed a comprehensive Environmental Health and Safety Manual to provide policy and technical guidance. Section I.B. of that manual includes an extensive description of the mission, make-up, function and goals of campus Environmental Health and Safety Committees.

- B. Each institution is responsible for establishing its own Health and Safety Committee. System Administration staff will assist with those efforts upon request.

**PROGRAM ELEMENT VI.      *Written Work Rules and Safe Work Practices***

- A. Each campus is responsible for developing its own standard operating procedures/work rules which conform to UW System policy, regulations and health and safety action plans as required by the Governor's Executive Order #194.
- B. All UW System employees have a responsibility to consider safety a high priority. Those in management and supervisory positions should use their authority and leadership skills to develop department-wide support for employee safety and health.
- C. UW System employees are responsible for their own safety and health as well as the safety and health of their co-workers.
- D. Personal protection equipment is provided to employees, along with instructions and training regarding their proper use.
- E. Back power training programs have been initiated to demonstrate proper exercise and lifting and moving techniques.

**PROGRAM ELEMENT VII.      *Health and Safety Training and Education***

- A. UW System Administration's Office of Safety and Loss Prevention staff develop training aids and instructional materials, and plan and sponsor Systemwide conferences for EH&S and Occupational Safety staff, Risk Management, and Workers Compensation staff.
- B. UW System Administration's Office of Safety and Loss Prevention conducts topical training according to current program initiatives, and as requested by institutions. Specialized training consultants are brought in as needed to provide program-specific training.
- C. The *UW System Environmental Health and Safety Manual* serves as the policy and technical guidance for the Environmental/Occupational Health and Safety program. There are numerous instructions, guides and training programs contained in the manual.
- D. UW System Administration EH&S staff have provided and/or coordinated training to campus staff in a variety of areas including but not limited to: Right-to-Know, Hazardous Waste Management, Spill Response, Chemical Safety Practices, Machine Guarding, Accident Analysis/Investigations, Ergonomics, and Bloodborne Pathogens.

**PROGRAM ELEMENT VIII.      *Establish a procedure for conducting periodic health and safety inspections/surveys***

- A. UW System Administration EH&S staff arrange for loss control inspections to be conducted by outside consultants and funded by DOA. These audits are conducted at each four- and two-year campus every two years. Each campus is, within a specific timeframe, responsible for following up on deficiencies noted.
- B. UW System Administration EH&S staff conduct management reviews of varying scope, based on needs identified by the campus EH&S Manager. Reports include recommended solutions.

- C. UW System Administration EH&S staff work with campus counterparts to remedy deficiencies found in both types of audits as well as regulatory (DILHR, DNR) inspection follow-up.

**PROGRAM ELEMENT IX.        *Minimize the risk of occupational injuries and illnesses by the use of recommended loss prevention and control techniques***

- A. UW System Administration EH&S staff use an analysis of the findings of contractor loss control inspections, EH&S Management Reviews, regulatory inspections, and other sources of loss or risk information, to determine priorities and address issues.
- B. UW System Administration staff will make every effort to use the following hierarchy to eliminate and control identified job hazards:
  - 1. Engineering controls: e.g., flammable storage cabinets, eye wash stations, improved ventilation systems, fume hood and fire extinguisher inspections.
  - 2. Procedural and administrative controls: e.g., substitution of less toxic materials, hepatitis vaccinations.
  - 3. Personal protective equipment: e.g., respiratory protection, safety glasses/goggles, hearing protection, gloves, etc.
- C. The UW System Administration Office of Safety and Loss Prevention staff will continue to serve as staff to the campuses and pursue funding sources for safety and loss prevention activities. Examples include the UW System Uninsured Loss Fund, the Rank Fund, DOA's Safety Training and Equipment fund.

**PROGRAM ELEMENT X.        *Promote health and safety awareness and safe work practices***

- A. UW System Administration EH&S staff produce a quarterly Environmental Health and Safety newsletter to keep campus staff current on EH&S topics.
- B. UW System Administration EH&S staff produce topical brochures (e.g. Art Hazards, Compressed Gas Cylinders, Fume Hood Safety, etc.).
- C. UW System Administration EH&S staff maintain a training resources library of videos and literature that are made available on a loan basis, free of charge.
- D. UW System Administration Office of Safety and Loss Prevention staff conduct ad hoc meetings and teleconferencing for regulatory updating and compliance strategy development.

**PROGRAM ELEMENT XI.        *Accident Investigation and Reporting Procedures***

- A. The accident report form has been modified and incorporated into a comprehensive computerized Worker's Compensation data system with detailed instructions for completing it. The development of this data base will enhance uniform reporting and recordkeeping and stimulate prompt attention to accidents and their causes.



- B. All accidents involving UW System employees require some degree of analysis to correct deficiencies which might cause recurrence. Accident analysis is used to establish relevant facts surrounding the accident; collect opinions of those present regarding the accident's cause; and determine how to prevent future accidents.
- C. Each campus's Occupational Safety manager has been offered training in accident analysis, through the Annual UW System Occupational Safety training session and also via consultants specializing in this field.

**PROGRAM ELEMENT XII.      *Worker's Compensation Claims Management***

- A. The UW System provides Worker's Compensation coverage to employees who have incurred work related injuries or illnesses. This coverage includes partial wage replacement and full payment of reasonable medical and rehabilitation costs. In case of death, Workers' Compensation benefits are paid to the employee's dependents.
- B. The UW System has recently converted to a new Worker's Compensation claims management data system. It is anticipated that this system will facilitate our claims management process, and produce more reliable data.
- C. UW System Administration has reassigned staff to provide a full-time claims management supervisor.
- D. UW System Administration claim's staff will engage the services of consultants to provide medical case management which include utilization review, medical bill auditing, and rehabilitation services.
- E. Specific claims management responsibilities may be decentralized as campuses develop expertise in various Worker's Compensation areas.
- F. The UW System Administration will provide training to campus Worker's Compensation staff.

**PROGRAM ELEMENT XIII.      *Promote the early return to work of injured employees using transitional work assignments and other rehabilitation strategies***

- A. The UW System will work with the Human Resources Staff, Department of Employment Relations, and unions to promote early return to work programs within legal, financial and medical constraints.
- B. UW System Administration staff have initiated a Job Safety Analysis pilot project through the Department of Administration. When completed, the job safety analyses will be used to consider the feasibility of an individual's ability to be returned to work in a job which does not compromise his/her healing process and does bring the individual into a productive status with his or her university.