

Injury and Illness Prevention Program (IIPP)

Responsible Administrator: Safety and Injury Prevention Division
Revised: November 2021

Summary: This section outlines the policy and procedures related to the Injury and Illness Prevention Program (IIPP) that is administered through the Environmental Health & Safety (EH&S) Department.

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1. Program Description

Per the California Code of Regulations, Title 8, Section 3203, UC Irvine has adopted an Injury and Illness Prevention Program (IIPP), which describes specific requirements for program responsibility, compliance, communications, hazard assessment, accident/exposure investigations, hazard correction, training, and recordkeeping. The University of California, Irvine (UCI) complies with Title 8 of the California Code of Regulations, Section 3203 strives to maintain a safe and healthful working environment, and has implemented this Injury and Illness Prevention Program (IIPP) for this purpose.

UCI's IIPP is posted on the Environmental Health and Safety website at www.ehs.uci.edu, under "Safety and Injury Prevention" and also under the "How Do I" drop down page. This document is posted for all UCI employees to access at any time.

2. Scope

The University of California, Irvine:

- Provides procedures for identifying and evaluating hazards and unsafe conditions;
- Develops procedures for correcting hazards and unsafe conditions;
- Communicates with employees regarding health and safety matters and how to report hazards;
- Provides employee training programs;
- Develops compliance strategies;
- Maintains documentation for health and safety programs; and Identifies a person or persons with authority and responsibility for implementing the program

3. Responsibilities

3.1 Program Administrator

The ultimate responsibility for providing resources towards the goal of effective policies regarding environmental health and safety issues rests with the Chancellor. General policies, which govern the activities and responsibilities of the Environmental Health and Safety program, are established under

the authority of the Chancellor. As designated by the Chancellor, the individual with responsibility for implementing the IIPP is the Executive Director of Environmental Health & Safety (EH&S), hereafter referred to as the Program Administrator. The Program Administrator has the authority to implement all provisions of this program. All University employees are responsible for supporting the program and for working safely and maintaining a safe and healthful work environment.

3.2 Environmental Health & Safety (EH&S)

- Provides consultation to all levels of UC Irvine staff and faculty regarding program compliance.
- Develops templates to assist Schools, Departments, and Work Units in implementing effective injury and illness prevention programs.
- Consults on issues of hazard identification and evaluation, procedures for correcting unsafe conditions, systems for communicating with employees, regularly scheduled safety meetings, employee training programs, compliance strategies, and recordkeeping.
- Provides centralized monitoring of campus-wide activities in the areas of environmental compliance, biological safety, chemical hygiene, emergency preparedness, fire safety, hazard communication, hazard identification, hazardous materials management, industrial hygiene, occupational safety, sanitation, and safety education and training.
- Maintains centralized environmental and employee exposure monitoring records, allowing employee access to records as directed by law.

3.3 Schools and Business Units - Associate Vice Chancellors, Deans, Directors, Department Chairs, and other managers are responsible for ensuring that:

- Individuals under their management have the authority to implement appropriate health and safety procedures, 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 UC Irvine health and safety practices, policies, and programs.
- A responsible person ([see SOS Representative - Section 2.6](#)), within each work unit under their management is designated to partner with EH&S to implement the work unit specific component of the IIPP.

3.3.1 Work unit - lowest level group of individuals that:

- Includes at least one of the following:
 - -Principal Investigator
 - -Academic Business Officer
 - -Director
 - -Manager/Supervisor
 - -Unit/Department Head
- Holds periodic meetings where safety is discussed.
- Includes people who work closely and perform similar work activities on a regular basis
- Has unique training needs in order to successfully implement unit specific procedures.

3.4 Supervisors

In partnership with EH&S, Supervisors are responsible for implementing the UC Irvine Injury and Illness Prevention Program. Supervisors implement the IIPP through the following actions:

- Identify an [SOS Safety Representative \(SR\)](#). This person may also be the PI or Supervisor.

- Ensure that work unit health and safety practices are communicated and understood through training and other programs.
- Ensure that health and safety practices are consistent throughout the work unit and that work unit specific training is provided.
- Include compliance with health and safety procedures as part of the annual performance evaluation.
- Encourage employees to report safety concerns without fear of reprisal.
- Report injuries promptly to [Workers' Compensation](#).
- Where appropriate, facilitate the implementation of:
 - [Hazard Identification Checklist](#)
 - Work unit specific staff training beyond the required EH&S safety courses offered.

3.4.1 Laboratory Principal Investigators (PIs) / Lab Supervisors

Laboratory Principal Investigators and Laboratory Supervisors must satisfy the list of items on the [Principal Investigator's Checklist](#) to implement IIPP.

3.5 Employee Responsibilities

Safety On Site (SOS) has been developed by UC Irvine to ensure that employees implement and follow the Injury and Illness Prevention Program (IIPP). Employees are responsible for following the requirements of the IIPP through the following actions:

- Complete all EH&S required training identified by the Safety Training Self-Assessment (STSA) in the UC Learning Center (www.uclcl.uci.edu), including Safety Fundamentals, Laboratory Safety Fundamentals, or School of Medicine Annual Training.
- Know who is the designated SOS Safety Representative (SR) for your work unit.
- Participate in all work unit specific training recommended and/or coordinated by your designated SR.
- Ask your SR, supervisor or faculty when concerned about an unknown or hazardous situation or substance.
- [Report all unsafe conditions](#), practices, or equipment to your supervisor, SR, or to campus EH&S.

3.6 Safety Representative (SR)

SOS Safety Representatives are responsible for following the requirements of the Injury and Illness Prevention Program through the following actions:

- Complete all EH&S required training identified by the STSA in the UC Learning Center (www.uclcl.uci.edu)
- Complete the work unit specific [Hazard Identification Checklist](#) and ensure that identified hazards are corrected and addressed.
- Develop a [Standard Operating Procedure \(SOP\)](#) as necessary.
- Ensure work unit employees take their Safety Training Self-Assessment and take all EH&S required training.
- Conduct and/or coordinate [work unit specific training](#) for all employees in your work unit every three (3) years and for new employees.
- Maintain written records for work unit specific training using template.
- Conduct work unit inspections. (Recommended)

Qualifications of a Safety Representative:

- Competency in administrative work activities or area of research.

- Ability to communicate safety procedures.
- For SRs in laboratories, a background in chemical, biological, and/or radiological safety issues, where applicable.

3.7 Student Employees

Student employees are responsible for following the requirements of the Injury and Illness Prevention Program through the following actions:

- Ask your supervisor or faculty questions when concerned about an unknown or hazardous situation or substance.
- Report all unsafe conditions, practices, or equipment either to your supervisor or to [EH&S](#).
- Keep informed about conditions that may impact your health and safety.
- Participate in EH&S [training programs](#), as required.

4. Program Components

Communication

UC Irvine communicates with employees, faculty, and staff in a form readily understandable and accessible to all affected parties on matters pertaining to occupational safety and health, including provisions designed to encourage employees to inform their supervisor or EH&S of hazards at the worksite without fear of reprisal. University employees shall not suffer any type of reprimand, discipline, or punishment as a result of reporting a safety hazard or concern. UC Irvine uses various systems and methods to communicate or relay information on these matters, which include:

- [Training Programs](#)
- Regularly scheduled safety committee meetings
- Publications including:
 - [EH&S Programs Manual](#)
 - [UCI Emergency Procedures](#)
- Participation in [research compliance panels](#), and [anonymous and confidential hazard reporting](#)

Hazard Identification and Evaluation

UC Irvine has procedures for identifying and evaluating work place hazards, including scheduled periodic inspections to identify unsafe conditions and work practices. EH&S conducts periodic inspections of campus buildings and laboratories, including routine radiation safety and biological safety inspections.

Safety Representatives complete Hazard Assessments for their work unit.

The following tools are used to identify hazards and unsafe conditions in the work unit:

- [Hazard Identification Checklist](#)
- Work Station Ergonomic Evaluations
- Work Unit Inspection Tools
- Laboratory Safety Inspection Checklist
- Self-Inspections for Labs Checklist
- Building Survey Checklist

UC Irvine has a COVID-19 Prevention Plan that addresses all of the elements as set forth in the Cal/OSHA Emergency COVID-19 Prevention Regulation, 8 CCR 3205. Please refer to Appendix A.

Hazard Correction

Unsafe or unhealthful work conditions, practices, or procedures are corrected in a timely manner based on the severity of the hazards and available university funds. For serious hazards that are immediately dangerous to life or health, immediate action will be taken to mitigate the hazard. The Supervisor/Principal Investigator, department heads, EH&S, and all affected employees will be notified of the hazard. If the hazard cannot be immediately abated, all personnel will be removed from the affected area. Access to the area will be controlled until the safety of personnel can be assured.

Training and Instruction

Training is provided to each employee, including managers and supervisors, with regard to general safety procedures and to any hazards specific to an employee's job.

All employees must complete required safety training as identified by the STSA in the UC Learning Center (www.uclc.uci.edu). The STSA identifies safety training based upon work environment and work activities. Results may include Safety Fundamentals, Laboratory Safety Fundamentals, or School of Medicine Annual Training. Training occurs:

- Upon the hiring of a new employee;
- When an employee is given a new job assignment for which training has not been provided; or
- When new substances, processes, procedures, or equipment that represent a new hazard are introduced.
- When recertification is due.

Training records for all EH&S training courses can be found at (www.uclc.uci.edu).

Recordkeeping

The University has taken the following steps to document and maintain the IIPP:

- All IIPP related documents are maintained a minimum of 10 years.
- Employee exposure records are maintained for at least 30 years.

5. Reporting Requirements

When an injury or illness occurs that is serious enough to require immediate medical treatment, notify University Police by calling 911 on a campus phone or (714) 456-6123 at the UC Irvine Medical Center.

6.1 Reporting. The [Online Incident Report](#) must be completed for all employee work-related injuries and illnesses within 24 hours of the incident. For additional information, please refer to the [Workers' Compensation](#) website.

6.2 Investigations. As part of completing the Online Incident Report, the employee and supervisor work together to determine the cause of the incident and to ensure that appropriate follow-up, hazard communication, and hazard correction has occurred. EH&S reviews online incident reports. Incident reports and EH&S investigations are documented and filed with EH&S and Workers' Compensation.

Additional Resources:

- [Report a Safety Concern](#)
- [Report a Work-related Injury or Illness](#)
- [Workers' Compensation](#)

- [UC Irvine Injuries & Medical Treatment](#)

6. References

UC Irvine:

[Training Schedule and Registration](#)

[Report a Safety Concern/Near Miss](#)

[Report a Work-related Injury or Illness](#)

[FAQs](#)

State Agencies:

[California Division of Occupational Safety and Health \(Cal/OSHA\)](#)

[California Environmental Protection Agency](#)

[California Air Resources Board](#)

Appendix A

Work Site Specific Plan (WSSP) as created by UCI's Campus Recovery Implementation Team (CRIT) Plan

UCI COVID-19 Resumption of In-Person Instruction/Operation Planning in Compliance with California's 9/30/2020 COVID-19 Industry Guidance: Institutions of Higher Education

Hal S. Stern, Interim Provost and Executive Vice Chancellor, has been designated as the person responsible for implementing UC Irvine's comprehensive COVID-19 prevention plan¹.

UCI utilizes [Executive Directives](#) to ensure consistent and timely direction from leadership. Executive Directives allow UCI to swiftly respond to the quickly changing COVID-19 landscape. Once an urgent need is identified, a panel of Campus Recovery Implementation Team (CRIT) members assist leadership to develop relevant Executive Directives for senior leadership to evaluate. Examples of issues calling for Executive Directives include: [student testing](#), [contact tracing](#), [face coverings](#), [travel](#), [daily symptom checking](#), [training](#), [invited guests/visitors](#), and [gatherings](#). UC/UCOP directives also address relevant issues including the [2020-21 flu vaccination requirement](#). UCI maintains a [Coronavirus Information Hub](#) and provides [daily updates](#) to keep the UCI community informed about the most recent relevant information and resources.

UCI's employees and students work and learn in a wide variety of diverse facilities with unique characteristics. To address this diversity of conditions, UCI's plan consists of seven component plans: 1) Instructional Activities; 2) Student Housing; 3) Student Life; 4) Athletics; 5) Lab Specific Research Ramp-up plans; 6) Unit Level Work-site plans; and 7) Curtailment of Operations. These plans are currently written to comply with *Red – Substantial – Tier 2* and *Purple – Widespread – Tier 1* guidance. As Orange County moves to a less restrictive tier (Orange or Yellow), the campus may determine that it is less disruptive to wait for a future academic quarter to implement any changes in campus guidance and operations. On the other hand, if the State issues more restrictive guidance for Orange County, the campus will immediately adjust plans and operations to comply with the guidance.

1) Instructional Activities

- Students will participate in remote instruction during the fall quarter with a handful of exceptions. See [here](#) for more information on undergraduate instruction and [here](#) for graduate instruction.
- Instructors and TAs are permitted to use campus offices and classrooms for remote teaching in coordination with an approved Unit Level Work-site Plan (see below). More details are available [here](#).
- Campus has put in place protocols for classroom cleaning and use, whether for in-person or remote instruction. Information is available [here](#).
- UCI has developed the following [Guiding Principles](#) and [Implementation Guidelines](#) for planning around remote and in-person instruction for undergraduate courses. For information about

¹ This addresses the requirement on page 5 of the State Guidance for IHE of 8/7/2020, under COVID-19 Prevention Plan, bullet #1, to establish a written plan and designate a person for the campus to implement the plan.

planning for remote and in-person instruction for graduate courses, please see [Graduate Curricular Plans](#).

2) Student Housing

- All residence hall rooms will be single occupancy spaces
- Apartment spaces will be operated with occupancy of one student per bedroom, including third party operators
- Bathrooms and common areas will have reduced occupancy and support physical distancing
- Spaces will be held for isolation/quarantine
- Residential dining will serve to-go meals

3) Student Life

- Existing campus policies will be used in addition to Executive Directives for policy violations
- Incidents may be reported at the Academic Integrity & Student Conduct [website](#)
- A process for following up on student conduct policy violations and sanctioning has been established and will be shared with students
- All resource centers and student centered units will offer only virtual services and programming in the fall
- Student Government Student Media will continue to offer campus shuttle services on-campus only, a full assortment of student life programming virtually, and student media programs virtually and/or digitally
- FRESH Basic Needs Hub will remain open with modified hours to serve students struggling with basic needs
- Anteater Ambassador program will lead peer-to-peer education efforts
- Campus organizations will be advised to offer virtual interactions only and informed of group and individual repercussions if they fail to adhere to policy
- Various centers will offer self-care and mentoring opportunities virtually

4) Intercollegiate Athletics

Plans for Intercollegiate Athletics' return to physically distanced training, team practice, and competition *are continually evolving based on the latest information and guidance provided by the [NCAA Sport Sciences Institute Resocialization of Sport guidance](#)* and public health officials. Plans are both facility specific and sport specific and are subject to review utilizing the same on-campus approval process for all units.

5) Lab Specific Research Ramp-up Plans

Approval to engage in on-campus research activities will occur gradually, over an extended period of time, and in a carefully measured fashion consisting of four phases:

- Phase 1 – Critical (Essential) Research Activities
- Phase 2 – Research Activities That May Pose Lower Risk for Virus Transmission (current phase)
- Phase 3 – Research Activities That May Pose Higher Risk for Virus Transmission

- Phase 4 – Research Activities After End of Stay-at-Home Order

UC is currently in Phase 2 of the Research Ramp-up Plan. Lab-specific Phase 2 research plans are approved through the following process: <https://news.research.uci.edu/research-continuity/research-ramp-up/>

The Vice Chancellor for Research will inform the research community when UCI will move from one phase to the next, based on guidance from the State of California and Orange County and other relevant public health authorities.

6) Unit Level Work-site Plans

All units with employees working on-campus for any amount of time must have an approved Return to Work plan in place. This plan must include a site-specific analysis, documentation, and approval of the following:

- [Working Well Leader Checklist](#)
- [Physical Space Assessment](#)
- [Risk Assessment Form and Protection and Monitoring Plan](#) (distributed to unit employees and posted at the work-site)

Approval Process for Site-Specific Return to Work Plans

- Depending on the extent and complexity of the unit’s planned on-site operations, plans are approved through one of two routes (see [here](#) for details):
 - Approval Route #1: Significant Return – approved by Return Plan Review Committee. A significant return involves work that must be performed on site that:
 - Involves 30% or more of a unit’s employees returning to campus, or
 - In-person services offered to the general public, or
 - Significant interaction with other employees
 - Approval Route #2: Less Significant Return – approved by unit head (DEAN/VC/VP, AVC/AVP, etc.). This includes:
 - Units with employees who have an occasional, recurring need to come to campus
 - Units with continuing operations that never stopped during the COVID-19 campus closure (NOTE: large scale continuation plans may need to be approved through Route #1 – Significant Return).
- Under Approval Route #1: Significant Return, a subcommittee made up of personnel with varied backgrounds from CRIT evaluates the unit’s proposed plan. The subcommittee’s analysis includes a review of population density and its controls. There is a close discussion between the subcommittee and the units to ensure a sufficient level of understanding of current protocols and policies. Following approval of the unit’s plans, there is an expectation of self-monitoring and reporting to CRIT by the unit as necessary.
- The Campus Recovery Implementation Team (CRIT) keeps records of the submission and approval of all plans, regardless of whether they are approved through Route #1 or Route #2.
- CRIT consults with units approving plans through Route #2 and conducts post-audit reviews of these plans. CRIT may request modifications if deficiencies in these plans are identified.

Ongoing Monitoring and Plan Modifications:

- Once approved, unit level Plan Owners have the following responsibilities:
 - Coordinating with Facilities Management, Environmental Health & Safety, and the Logistical Support Team to implement site-specific modifications (signage, barriers, physical distancing markings, etc.) and supplies (face coverings, sanitizing supplies, etc.)
 - Monitoring and confirming compliance with plan
 - Reviewing approved plan every 30 days and submitting proposed changes through one of the two above approval routes. Proposed changes should not be implemented until they have been approved².

7) Curtailment of Operations³

UCI has created and implemented plans in compliance with guidelines from state, county, and health officials. These cover most situations related to the phased reopening of the campus for students, faculty, and staff. Given the dynamic nature of the COVID-19 pandemic, UCI's plans are flexible and will be revised based on new relevant guidance and situational awareness. The campus response will be developed and tailored to the specific factor or triggering event. Some potential factors or triggering events that may result in a campus response include:

- National Considerations
 - Supply chain issues
 - Start of 2nd / 3rd wave of infections
 - Travel restrictions
 - Political disruptions
- State Considerations
 - State mandated restrictions (i.e. Governor's Office guidance)
 - UC / CSU outbreaks
- County Considerations
 - State watch list metrics
 - Case rate
 - Testing positivity
 - Hospitalization rate
 - ICU bed availability
 - Ventilator availability
 - Change in hospitalization
 - Days on/off State monitoring watch list
 - Outbreaks at other local universities or colleges
 - Increase of influenza cases
- Campus Considerations
 - Number of students/faculty/staff in isolation and quarantine
 - Failure to comply with physical distancing policies

² This addresses page 5, bullet #4 of the State Guidance.

³ This section addresses #2 on page 6 of the State Guidance, bullet #3.

- COVID related death of a student, or staff, or faculty member
- Increased levels of employee absenteeism in areas essential to campus health and safety (Facilities, EH&S, UCIPD, Campus Housing, etc.)
- Substantial increase in positive tests among faculty, staff, or students
- Testing delays in excess of 48 hours for results
- Contact tracing identification of areas of concern
- Shortages in personal protective equipment or sanitization supplies that impact safe operations
- Identification of large clusters, or increasing cases of community transmission, in campus student or employee population
- Degradation of containment capabilities

Methods for Monitoring and Responding to Triggering Events

The campus has developed an internal dashboard that reviews data from symptom-checking, symptomatic tests, asymptomatic tests, isolation/quarantine (from our contact tracing team), county data, and social media information. A leadership team meets daily to review this information and determine appropriate responses.

Under the direction of this leadership team, a work group has developed general principles and scenarios regarding how to respond to clusters identified through contact tracing in various parts of campus (lab, dorm floor, etc.) at various levels of severity up to and including a scenario that requires stopping all in-person classes and asking employees and students to quarantine in place.

Designated COVID-19 Point of Contact⁴

We have established a [Coronavirus Resource Response Center](#) and a [Case Reporting Website](#) to report and track COVID-19 cases. The Center for Occupational & Environmental Health and Student Health Center conducts case tracking and follow up activities.

Factors to Consider:

Responses to triggering events should place the highest priority on the health and safety of faculty, staff, students, and the broader community. Additional factors that should be considered include:

- Business continuity risks
- Research continuity risks
- Academic continuity risks
- Reputational risks

Response plans will vary, depending on the scope of the triggering event.

- Site-specific Exposure/Curtailment
 - Units with a known COVID-19 exposure should consult with UCI's Center for Occupational and Environmental Health regarding necessary next steps. These may include:

⁴ This section addresses Designated COVID-19 Point of contact on p. 20 of the State Guidance, bullet #1.

- Temporary closure of specific facilities for deep cleaning.
 - Temporary relocation of work or instructional activities for non-exposed employees and students.
 - Heightened physical distancing, increased environmental cleaning, and reduced occupancy.
 - Modifications to Return to Work Plans (in coordination with CRIT).
 - Discontinuation of Return to Work Plans and reversion to earlier phases of operation (in coordination with CRIT).
- Larger Scale Closure/Curtailment of Operations
 - In the event of State, County, or UC guidance that further restricts on-campus operations on a larger scale, the Strategic Advisory Group will direct the Campus Recovery Implementation Team to recommend policies/procedures to ensure compliance with new guidance, potentially including:
 - Closure of residence halls or further reduction in residence hall population
 - Curtailment of non-essential research activity
 - Curtailment of faculty use of campus facilities for remote instructional purposes
 - Curtailment of some/all Return to Work Plans