1. POLICY
   1. DiabetOmics believes that everyone benefits from a safe and healthful work environment. We are committed to maintaining an injury-free and illness-free workplace, and to complying with applicable laws and regulations governing workplace safety.
   2. To achieve this goal the company has adopted an Injury and Illness Prevention Program (IIPP). This program is everyone’s responsibility as we work together to identify and eliminate conditions and practices that reduce the benefits of a safe and healthful work environment.
   3. The IIPP is an overarching and extensive program that includes training, exposure control plan (ECP), chemical hygiene program (CHP), workplace violence, environmental safety policies, emergency procedures and accident investigations.
   4. The IIPP will be reviewed annually or whenever necessary to reflect changes in tasks, procedures, technology, medical devices, and new or revised job descriptions.
2. RESPONSIBILITIES
   1. All employees are expected to adhere to all IIPP policies, and to work conscientiously to implement and maintain the IIPP.
   2. Management is responsible for the leadership of the IIPP, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions. The Chemical Hygiene Committee members will function as Safety Officers.
   3. The Safety Officers have the authority and overall responsibility for implementing and maintaining the IIPP.
   4. Supervisors are responsible for ensuring that operations within their work area are performed with the utmost regard for the safety and health of all personnel involved, including themselves. They are expected to do everything within their control to assure a safe workplace in their area.
   5. Management and supervisors will ensure that employees understand the safety and health requirements before being assigned to duties exposing them to workplace hazards.
3. COMPLIANCE
   1. Management and supervisors are responsible for ensuring that company safety and health policies and procedures are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly.
   2. All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.
   3. Our system for ensuring that all employees comply with these practices includes:
      1. Informing employees of the provisions of our IIPP.
      2. Providing and documenting thorough training on all aspects of the IIPP.
      3. Providing re-training and/or disciplining employees who fail to follow safe work practices or who violate the company’s safety rules.
   4. Employee annual performance evaluations will reflect the adherence to safety practices. Non-compliance with safety policies and procedures will result in counseling, and continued non-compliance could lead to disciplinary action up to and including termination of employment.
4. COMMUNICATION
   1. DiabetOmics recognizes that open, two-way communication between management and staff on health and safety issues is essential to an injury-free and productive workplace. Management is responsible for communicating with all regular and temporary employees about occupational safety and health in a format readily understandable by all employees.
   2. Employees are encouraged to inform management of hazards at the worksite without fear of reprisal. Employees should complete the Hazard Report Form and submit to manager, safety officer or director.
   3. Our communication system includes the following:
      1. Newly hired employee orientation will include review of DiabetOmics IIPP and a discussion of safety and health policies and procedures that the employee is expected to follow.
      2. Employees are encouraged to make safety and training suggestions, either verbally or written, to their supervisor or DiabetOmics Laboratory Safety Officer. The Safety Officer will review notification and suggestions. No employee will be retaliated against for reporting hazards or making suggestions related to safety.
   4. Chemical Hygiene and Safety meetings will be quarterly. Meetings will focus on occupational accident and injury history and feedback from employee group.
5. TRAINING
   1. The goal of our safety-training program is to develop safe work habits and attitudes. All regular and temporary employees, including managers and supervisors, shall have training and instruction on general and job-specific safety and health practices. It is the responsibility of managers and supervisors to ensure that their employees are properly trained on the necessary safety issues. Training and instruction can be provided through an on-site safety meeting.
   2. Complete IIPP training will be provided and documented on hire and then annually, or more often when necessary. Training will be provided when tasks, where occupational exposure may occur, are initially assigned, and when changes or new tasks or procedures are instituted.
   3. DiabetOmics Laboratory workplace safety and health practices training includes, at a minimum, the following elements:
      1. A copy and explanation of the OSHA bloodborne pathogen standard.
      2. An explanation of our ECP and how to obtain a copy.
      3. An explanation of methods to recognize tasks and other activities that may involve exposure to blood and other potential infectious material (OPIM), including what constitutes an exposure incident.
      4. An explanation of the use and limitations of engineering controls, work practices, and personnel protective equipment (PPE).
      5. An explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE.
      6. An explanation of the basis for PPE selection.
      7. Information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine will be offered free of charge.
      8. Information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM.
      9. An explanation of the procedure to follow if an accident or exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available.
      10. Information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident.
      11. Chemical hygiene plan.
      12. How to read labels and SDSs to obtain hazard information.
      13. Location of SDS file.
   4. Documentation of training will be maintained in employee files.
6. HAZARD ASSESSMENT AND CORRECTION
   1. Hazard assessment is the heart of an effective IIPP. DiabetOmics Laboratory hazard control procedures are:
      1. Identify hazards that exist or may develop in the workplace.
      2. Describe how to correct these hazards; and
      3. Initiate steps to prevent their recurrence.
      4. Report all potential and existing hazards to Manager or Safety Officer by completing and submitting Hazard Report Form.
   2. Periodic safety inspections to identify and evaluate workplace hazards shall be performed by the Safety Officer according to the following schedule:
      1. On implementation of IIPP.
      2. When new substances, processes, procedures or equipment that present potential new hazards are introduced into our workplace.
      3. When new, previously unidentified hazards are recognized.
      4. When occupational injuries and illnesses occur.
      5. When employees are hired/reassigned to processes, operations, or tasks for which a hazard evaluation has not been previously conducted.
      6. Whenever workplace conditions warrant an inspection.
      7. Document inspection using Safety Inspection Checklist.
   3. Hazard correction
      1. Unsafe or unhealthy work conditions, practices, or procedures shall be corrected in a timely manner based on the severity of the hazards.
      2. When an imminent hazard exists that cannot be immediately corrected without endangering employee(s) and/or property, the appropriate management will remove all exposed employees from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided and use the necessary protection.
      3. Excessive noise needs to be monitored if employees are having to raise their voices to be heard.
      4. Document action taken to correct hazard on Hazard Report Form.
7. ACCIDENT/EXPOSURE INVESTIGATIONS
   1. A thorough and properly completed accident investigation is necessary to obtain facts. The investigation should focus on causes and hazards. Analysis of what happened and why it happened is aimed at determining how it can be prevented in the future.
   2. Reporting and recordkeeping.
      1. Employees are responsible for reporting all work place injury, illness and near misses by completing the Employee’s Report of Injury Form.
      2. This form is submitted to the manager, who will then initiate an investigation into the cause. Manager will document investigation using both the Supervisor’s Accident Investigation Form and the Incident Investigation Report.
      3. Record each injury/illness on OSHA Log of Occupational Work Related Injuries (OSHA Form 300) according to its instructions.
      4. Manager will annually review and certify the OSHA Form 300 and post the Summary of Work-Related Injuries and Illnesses (Form 300A) no later than February 1st and keep it posted where employees can see it until April 30th.
      5. OSHA Forms 300 and 300A are maintained for five years.
      6. All workplace fatalities must be reported to OSHA within eight hours and work-related in-patient hospitalizations, amputations, or losses of an eye within 24 hours.
      7. In addition to OSHA’s Recordkeeping Requirements (29 CFR 1904), all percutaneous injuries from contaminated sharps are also recorded in a Sharps Injury Log. This log is reviewed as part of the annual IIPP program evaluation and maintained for at least five years following the end of the calendar year covered. All incidences must include at least:
         1. Date of the injury.
         2. Type and brand of the device involved.
         3. Work area where the incident occurred.
         4. Explanation of how the incident occurred.
   3. Procedures for investigating workplace accidents and hazardous substance exposure include:
      1. Interviewing injured employees and witnesses.
      2. Examining the workplace for factors associated with the event.
      3. Determining the cause of the event.
      4. Taking corrective action to prevent the event for reoccurring.
      5. Recording the findings and corrective action taken.

**PROCEDURE NAME:** Injury and Illness Prevention Program

**FILE NAME/LOCATION:** davinci > lab > research and clinical community > CLIA > procedures and policies > safety

**BACKUP FILE LOCATION:**

**HARD COPY LOCATION:** Clinical Laboratory Safety Manual

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| --- | --- | --- | --- | --- |
| Authored | Type of Change | Version | Validation | Reviewed/Approved |
| Moana Montes  4/8/2011 | New procedure | A | Steve Kazmierczak, PhD  4/8/2011 | Steve Kazmierczak, PhD  4/8/2011 |
| Catherine Brooks  1/5/2016 | Revised – consolidated multiple safety policies | B | Steve Kazmierczak, PhD  1/26/2016 | Steve Kazmierczak, PhD  1/26/2016 |
| Catherine Brooks  4/13/2016 | Removed CHP as it is now a stand alone policy | C |  | Steve Kazmierczak, PhD  4/13/2016 |
| Catherine Brooks  4/18/16 | Restructured IIPP into multiple policies | D |  | Steve Kazmierczak, PhD  4/26/2016 |
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