



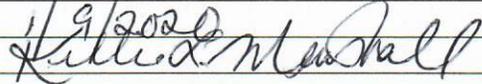
CALIFORNIA STATE UNIVERSITY
Stanislaus
ENGAGING · EMPOWERING · TRANSFORMING

Environmental Health and Safety Training Plan

*A Subsection of the Injury and Illness Prevention Program
Per California Code of Regulations Title 8 §3203*

PLAN REVIEW

This sheet should be completed each time the Health and Safety Training Program is reviewed and/or modified. The Director for Safety & Risk Management is responsible to review and update this plan annually or as needed per CSU Chancellor's Executive Order 1039.

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1.0 Regulatory Authority

California Code of Regulations, Title 8, Subchapter 4 and 7; California Code of Regulations, Title 8, Section 3203; CSU Occupational Health & Safety Policy (Executive Order 1039)

2.0 Administering Agency

California Division of Occupational Safety and Health, Department of Industrial relations (Cal/OSHA)

3.0 Background

The Occupational Safety and Health Act (OSHA) and similar regulatory agencies require Environmental Health and Safety (EHS) training at the workplace in many different circumstances. It gives employees an opportunity to learn their jobs properly, bring new ideas into the workplace, reinforce existing ideas and practices, and it helps to put the EHS Program into action.

Everyone at the University will benefit from health and safety training through fewer workplace injuries and illnesses, reduced stress, and higher morale. Productivity, profits, and competitiveness will increase as production costs per unit, turnover, and workers compensation rates lower.

4.0 Scope

This plan establishes the requirements for the EHS Training Plan at California State University Stanislaus. Training is one of the most important elements of a comprehensive EHS program. This plan applies to all employees of California State University Stanislaus including student assistants and in some cases volunteers. This does not include the general student population.

5.0 Policy

It is the policy of the University that all faculty, staff, student assistants, volunteers, and visitors who perform work at, or for the University, receive appropriate training necessary to protect their health and perform work in a safe and environmentally sound manner. This training must include information regarding job hazards, possible health effects, and required work practices and procedures. The EHS Training Plan has been designed to meet the requirements of federal, state, and local regulatory agencies.

The content of training sessions may vary, but each session whether provided by Safety & Risk Management (S&RM), other individual departments on campus, or outside vendors will work to perform these five University safety training requirements:

- Inform employees about any University standards, policies and procedures in regard to loss prevention, safety and health.
- Review the safe work procedures unique to that employee's job, and how these safe work procedures protect against risk and danger.
- When personal protective equipment (PPE) is required or necessary, and how to use and maintain the equipment in good condition.
- Learn what to do in case of emergencies occurring in the workplace.
- Provide direction on how to report hazards in the workplace.

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6.0 Objectives

The objectives of the EHS Training Plan are to:

- Identify all required and recommended environmental, health, and safety training
- Provide mechanisms to ensure that such training is completed
- Document all safety training
- Make training-related records and reports available to managers and regulatory agencies
- Provide a mechanism to ensure continuous improvement of the EHS Training Plan

7.0 Responsibilities

California State University Stanislaus will work to identify and eliminate hazards; if that is not feasible, training will be provided to prepare workers to protect themselves, if necessary, against any remaining hazards. If training can best address remaining health or safety hazards, appropriate training goals will be defined based on particular needs.

The University will commit available resources to ensure employees receive health and safety training during the following circumstances:

- Whenever a person is hired – general safety orientation including an overview of the University’s Injury and Illness Prevention Program and the importance of S&RM programs and procedures.
- Whenever an employee is given a new job assignment – during formal classroom training, and again when the supervisor provides specific task training. It is extremely important that supervisors emphasize safety during initial task assignment.
- Whenever new work procedures are introduced – during formal classroom training and supervisor on-the-job training.
- Whenever new equipment is installed – if new hazards are introduced.
- Whenever new substances are used – hazard communication requirements may apply.
- Whenever a new hazard is introduced or there has been an incident.

7.1 University Administration

University Administration will provide the necessary funds and scheduling time to ensure effective health and safety training is provided. This commitment will include paid work time for training and in the language that the worker understands.

To most effectively carry out their safety responsibilities, all employees must understand (1) their role in the plan, (2) the hazards and potential hazards that need to be prevented or controlled, and (3) the ways to protect themselves and others. University Administration will achieve these goals by:

- educating everyone on the natural and system consequences of their actions;
- educating all managers, supervisors and employees on their safety management system responsibilities;
- educating all employees about the specific hazards and control measures in their workplace;
- training all employees on hazard identification, analysis, reporting and control procedures; and

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- training all employees on safe work procedures and practices.

This training plan will focus on health and safety concerns that determine the best way to deal with a particular hazard. When a hazard is identified, we will first try to remove it entirely. If that is not feasible, we will then train workers to protect themselves, if necessary, against the remaining hazard. Once it is decided that a health and safety issue can best be addressed by training (or by another method combined with training), we will follow up by developing specific training goals based on those particular needs.

7.2 Safety and Risk Management (S&RM)

- Oversee the University's EHS Training Plan, including development, implementation, and evaluation of the plan.
- Provide consultative assistance on general safety training courses, provided by University departments, to meet regulatory requirements and injury and illness prevention needs.
- Maintain written documentation and database for all training courses provided by S&RM.
- Provide technical assistance to safety training course instructors and to management on their safety and job-specific training needs and plan.
- Review safety training courses to ensure proper qualifications of the trainer and training content.
- Assign the necessary required health and safety trainings through CSU Learn.
- Coordinate medical monitoring information in conjunction with training profile.
- Update and modify this plan, policies, and procedures that pertain to the Health and Safety of the University, as necessary.
- Ensure the EHS Training Plan is in full compliance with OSHA standards.

7.3 Deans, Directors, Department Chairs, Managers, and Supervisors

Deans, Directors, Department Chairs, Managers, and Supervisors will be given special training to help them in their leadership role. They will be taught to look for hidden hazards in the work under their supervision; insist on the maintenance of the physical protection in their areas; and reinforce employee hazard training through performance feedback and consistent enforcement when necessary.

They will commit necessary resources to ensure employees understand the responsibilities below and the reasons for them:

- Detecting and correcting hazards in their work areas before they result in injuries or illnesses
- Understand the hazards to which they may be exposed and how to prevent harm to themselves and others from exposure to these hazards.
- Providing physical resources and psychosocial support that promote safe work
- Providing performance feedback and effective recognition and discipline techniques
- Conducting on-the-job training

Deans, Directors, Department Chairs, Managers, and Supervisors are considered the primary safety trainers. They should understand their responsibilities within this EHS Training Plan. This may require classroom training and other forms of communication. Formal classroom training may not be necessary. The subject can be covered periodically as a part of regular management meetings provided by the Human Resources, S&RM, or by outside resources.

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Training will be provided in the following subject areas:

- the elements of the safety management system, and the positive impact the various processes within the system can have on academic objectives
- their responsibility to communicate the EHS Training Plan goals and objectives to their employees
- their role that includes making clear assignments of EHS Program responsibilities, providing authority and resources to carry out assigned tasks, and holding subordinate managers and supervisors accountable
- actively requiring compliance with mandatory EHS Program policies and rules and encouraging employee involvement in discretionary safety activities such as making suggestions and participation in the safety committee.

Training will emphasize the importance of visibly showing their commitment to the EHS program. They will be expected to set a good example by scrupulously following all the safety and health rules themselves.

It is the responsibility of the Deans, Directors, Department Chairs, Managers, and Supervisors to review their direct reports training record within CSU Learn and hold their direct reports accountable for completing the required training. Non-Compliance is reviewed by the University President on an annual basis and is reflected on their annual evaluation from the Chancellor's Office.

7.4 Faculty and Principal Investigators

Faculty and Principal Investigators are responsible for student safety training prior to any activity that has a potential for a safety concern (e.g. lab, field trip, internship, field study, etc.).

7.5 Employees

At a minimum, employees must know the general health and safety of the worksite, specific site hazards and the safe work practices needed to help control exposure, and the individual's role in all types of emergency situations.

Employees must know they are responsible for complying with all University safety policies and procedures, and that most accidents can be prevented by their safe work practices. They must be very familiar with any personal protective equipment required for their jobs. They must know what to do in case of emergencies.

Each employee needs to understand that they are not expected to start working a new assignment until they have been properly trained. If a job appears to be unsafe, they will report the situation to their supervisor.

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7.6 Students Assistants and Volunteers

Students and Volunteers who are employed by the University are also required to receive safety training when applicable to their jobs.

8.0 Training and Accountability

The safety and welfare of every individual on this campus is of utmost importance. To help insure that the health and safety policies and procedures are followed by everyone, normal disciplinary actions could be implemented against any individual (university employee or student) who disregards the safety of the campus community. The actions could include verbal or written reprimand and/or any other action up to and including termination or dismissal.

All employees shall adhere to healthy and safe work practices defined by established campus and departmental health and safety guidelines. Failure to do so may result in diminished performance evaluations and/or disciplinary action is implemented within authority and pursuant to collective bargaining unit agreements. Failure to comply with safe work practices may also lead to fines by Cal/OSHA, the EPA, and/or personal civil penalties.

9.0 Safety Training Plan

Completion of the required safety training courses ensures that all University personnel know basic employee procedures, the hazards associated with their jobs, understand the possible health and safety effects of exposure to those hazards, and know how to perform operations safely and in accordance with all environmental protection requirements. Some training requires a medical examination and approval before certification is issued (e.g. respirator training). Additional training and certification are required for work involving special hazards. These training courses are identified for each individual by their classification. S&RM will identify the necessary trainings required for each classification based on their job descriptions and assign the appropriate training through formal classroom training or CSU Learn, if applicable. Additional trainings may be assigned based on a job hazard analysis performed by employees and their supervisors.

9.1 New Employees

All new employees must:

- a. Complete New Employee Safety Orientation within the 90 days after starting work at the University. This orientation will include general safety information such as an overview of the IIPP, hazard communication, asbestos notification, defensive driver training, reporting campus hazards, emergency preparedness, and employee safety and responsibilities.
- b. While some trainings need to be completed within the first 90 days, other trainings are required to be completed within the first year of hire (e.g. IIPP).
- c. Receive basic site-specific safety information from their supervisor or other designated departmental personnel. This training shall include hazard specific safety training and procedural routines.

9.2 Student Assistants or Volunteers

All new student assistants or volunteers must receive basic site-specific safety information from their

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supervisor or other designated departmental personnel. This training shall include hazard specific safety training and procedural routines, if necessary.

9.3 Safety Training for Personnel at Off-Site Locations

All University employees working at off-site locations are required to conform to the five University safety training requirements. These requirements are identified by S&RM through the training matrix (See Appendix A). In some cases, facility or procedure-based safety training specific to the location will fulfill a University training requirement. For example, training connected with handling animals or working with youth, which covers specific procedures for an off-site facility, may be provided by the institution controlling the work space.

9.4 Refresher Training, Retraining or Recertification

Refresher training or recertification may be required by State and Federal regulations and CSU policy. Retraining is based on when an employee is given a new job assignment, new work procedures or hazards are introduced, new equipment is installed, new substances are used, or there has been an incident.

The following safety training classes have refresher requirements:

- Bloodborne Pathogens (Required annually)
- Defensive Driver (required every four years)
- Forklift/Power Lift Operations and Safety (required every three years)
- Hazard Communication (required every three years)
- Hazardous Materials Management (required annually)
- Hearing Conservation (required annually)
- Heat Illness Prevention (required annually)
- Respiratory Protection (required annually)

9.5 Tracking and Notification of Incomplete Training

CSU Learn has the ability to track and notify individuals of their training status. Employees will have 90 days to complete assigned courses. Notifications will be set to generate automatic reminder emails every day if not completed within the time allotted.

Individuals who do not attend required formal classroom training will be scheduled to attend a make-up session.

10.0 Documentation and Recordkeeping

A recordkeeping system shall be used to control all records and documents so they are:

- Easy to retrieve and identify and are maintained in an orderly fashion
- Current, accurate, legible, and dated, and that the dates should include revision dates when appropriate
- Relevant/applicable and satisfy regulatory and/or legislative requirements
- Retained for a specified time period – Retention of records may be regulated by legislative or regulatory policies (See Appendix B)

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10.1 Document Control

Records of training are required to verify that training has been completed. Records may be requested by regulatory organizations or as documentation for audit purposes.

a. Training development records shall identify:

- Your target audience
- The learning objectives
- Sources used to develop your training materials
- The person(s) designing and developing the training materials
- The qualifications of that person or persons
- All training materials developed for a course
- Plans for evaluating the course and for continuing improvement of the course

b. Training delivery records shall include the following items:

- Date of training
- Location of training
- Duration of training
- Name and description of course
- Names of person(s) delivering training
- Qualification of that person(s)
- Delivery method used for training
- Trainees attending/participating
- Trainees who successfully completed the training, a signature of the trainee must be obtained to verify attendance and completion

10.2 Certificates of Completion

Certificates of completion shall be issued in accordance with recognized established standards, regulations, or industry protocols. Certificates for training shall not be issued unless the criteria for completion have been met by the trainee.

The certificate must include:

- Trainee's name
- Course title
- Date and hours of instruction (if applicable)
- Statement that trainee has successfully completed the course
- Name and address of the training provider
- Date the periodic refresher course is due (if required), or the completion expiration date
- The level of training or type of certificate awarded (if applicable)
- Any other information required by any related regulation
- Signature of the training provider

11.0 Training Plan Evaluation

An evaluation of the effectiveness of the training plan will be conducted periodically. Evaluation will help determine whether the training provided has achieved its goal of improving employee safety and performance. When carefully developed and carried out, the evaluation will highlight training plan strengths and identify areas of weakness that need change or improvement.

- Evaluation will include analysis of employee attendance at training sessions. Training will not work for an employee who does not show up. Absenteeism can signal a problem with the worker, but it can also indicate a weakness in training content and presentation.
- Comparison between pre-and post-training injury and accident rates overall. The periods of time being compared must be long enough to allow significant differences to emerge if training has made a difference.
- Determine whether the training provided has achieved its goal of improving employee safety performance. Evaluation will highlight training plan strengths and identify areas of weakness that need change or improvement.

12.0 Types of Training

Required regulatory-related training will be conducted according to guidelines detailed in OSHA Publication, 2254. Additional training is conducted as deemed appropriate. In general, safety training will be conducted on the following levels:

- **General Safety Education:** General safety information is communicated to employees. No measurement of knowledge, skills, and abilities (KSA's) are required.
- **Specific Safety Training:** Specific safety information and instruction on performing safe procedures and practices. KSA's are measured/tested. Employees must meet established criteria for KSA's to successfully complete the course.

12.1 Identifying Types of Training

Specific hazards that employees need to know about should be identified through a job hazard analysis, job safety analysis and/or change analysis (See Appendix C). Accident and injury records may reveal additional hazards and needs for training. Near-miss reports, report a safety concern, and employee suggestions may uncover still other hazards requiring employee training.

a. CSU Learn

CSU Learn is the California State University's (CSU) learning management system (LMS) for compliance, professional development and instructor led training. The CSU requires that employees take certain courses to comply with state and university requirements that are driven by federal law, state law or CSU policy.

There are a number of EHS courses available through this online platform. To see a listing of these courses, visit <https://csyou.calstate.edu/Divisions-Orgs/HR/spd/compliance-training/Pages/Environmental-Health-and-Safety.aspx>

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b. Formal Classroom Training

Formal classroom training is structured and typically led by instructional designers and trainers in a classroom setting. Depending on the training requirements, some training courses require a Qualified Person to conduct training (e.g. Forklift training) while other training courses are taught by a Competent Person (e.g. Ladder Safety).

1. **Qualified Person:** A qualified person is a person designated by the employer; and by reason of training, experience, or instruction has demonstrated the ability to perform safely all assigned duties; and, when required is properly licensed in accordance with federal, state, or local laws and regulations.
2. **Competent Person:** A competent person is a person who is capable of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous, or dangerous to employees. The competent person has the authority to impose prompt corrective measures to eliminate these hazards.

c. On the Job Training (OJT)

OJT training relates principles and theories to work skills that are then taught and applied in the work environment. OJT is designed to reinforce formal classroom training. All new-hire employees require training to perform their jobs effectively. In this regard, OJT is an essential supplement to formal classroom training. OJT assignments may be provided concurrently with formal training to emphasize and complement material covered in formal training courses. Time allotted to accomplish OJT assignments should be compatible with the new-hire's current knowledge, skill, and experience levels. The employee's supervisor should assess the employee's ability to successfully complete OJT training.

1. **Contract workers:** Will receive training to recognize specific workplace hazards or potential hazards.
2. **Experienced workers:** Will be trained if the installation of new equipment changes their job in any way, or if process changes, create new hazards or increase previously existing hazards.
3. **All workers:** Will receive refresher training as necessary to keep them prepared for emergencies and alert them to ongoing housekeeping problems.

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Appendices

Appendix A: Training Matrix

Appendix B: Retention Schedule

Appendix C: Job Hazard Analysis

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Appendix A – Training Matrix

Safety Training Requirements
Asbestos/Asbestos Awareness (CSO, CCR 1529(k)(9)(B), 5208 (j)(7)(B)) Initial and Annual
Back Safety CCR 3203, Initial and every 3 years
Bloodborne Pathogen (CCR 5193(g)(2)) Initial and Annual
Boiler Safety (CCR 3202) Initial
Carcinogens-as listed (CCR 5209(e)(5)) Initial
Cardiopulmonary Resuscitation
Chain Saw (CCR 3203) Initial and every 3 years
Compressed Gas (CCR 3202, 3304, 2648) Initial and every 2 years
Confined Space (CCR 5157(g), 5158(c)(2)) Initial, Program Changes/Update, every 3 years
Defensive Driver Training (CO Policy) Once every four years
Domestic Violence Update (PC 13519(g)) Every 2 Years
Electrical Safety (CCR 2299-2974) Initial
Elevated Work (CCR 3298-3299, 3629) Initial
Elevating Work Platforms & Aerial Devices (CCR 3648(l)(7),(c) 3646 (c),3638(d)) Initial
Emergency Action Plan (CCR 3220(e)) Initial and Plan Update
Ergonomics (CCR 5110 (b)(3)) Initial and When standard is triggered
Eye Safety (CCR 3382)
Fall Protection (CCR 1671.1) Initial
Fire Extinguisher Training (CCR 6151(g)(1) & (2)) Initial and Annual
First Aid/First Aid&CPR (CCR 3439(b), 6251(d)(2),3400(b), 5157,5158,5193, 3421, 6052) -
First Aid-Construction (1512(b) & (d)) Initial and Updated
Flaggers (Traffic)/Traffic Control (CCR 1599(f) & (g)) Initial
Food Sanitation (H & S Code 113716(a))
Foot Safety (CCR 3385)
General Office Safety (CCR 3202) Initial
Hand Safety (CCR 3384)
Hazard Communication-GHS (CCR 5194(b)(1)) Initial, new chemical or process
Hazard Materials Spill (CCR 5194) Initial
Hazardous Waste Operations & Emergency Response (CCR 5192(E) & (q)(6)) Initial and A
Hazwoper (CCR 5194) Initially and as new chemicals are introduced
Hearing Conservation (CCR 5098(a)(4), 5097(d)(5)(A&B),5099(a)) Initial, Retraining, Annual
Heat Illness Prevention for Supervisors (CCR 3395) Initial and Annual
Heat Illness Prevention for Employees (CCR 3395) Initial and Annual
Industrial/Lift Trucks (Forklifts) & Tractors (CCR 3657(i), 3664(b), 3668) Initial, Annual, Observed Unsafe Operation, Post Accident, Equipment Change, Workplace Change and Operator Eval every 3 years
Injury & Illness Prevention Program (CCR T8,3203(a)(7), 1509(e)) Initial and Updated
Lab Safety (CCR 5191(f)(2)& CFR 1910, 1450) Initial, New Hazards, Refresher and every 3
Ladder Safety (CCR 3276(f)) Initial and Update
Laser Safety (CCR 3202) Initially
Lockout/Blockout (CCR 3314(j)) Initial and when updated, every 2 years
Perishable Skills (POST 1005(d)) Every 2 Years
Personal Protective Equipment (CCR 3380(c)) Initial/Update, every 2 years
Pesticide Safety (5194(h))
Pneumatic Nailers and Staplers (CSO 1704) Initially
Powered Industrial Trucks (CCR 3668) Initially and as needed
Racial Profiling (PC 13519.4) Every 5 Years
Respiratory Protection (CCR 5144(c) & (k), Appendix A and C) Initial and Annual
Scaffolds (1637(k)(1), 1658(g)) Initial
Silica Dust: Power tool work on concrete or masonry materials (CCR 1530.1(e1) &(e2)) In
Small Vehicle Safety - Once every four years
Standardized Emergency Management System (EO 1013, 1056) within one year of hire
Supervisory Safety (CCR 3203(a)(7)(F)) Initial and Change
Telecommunications (CLETS) Every 2 Years
Tree Work General (CCR 3420(b), 3421 (c), 3423(a), 3427) Initial
Welding & Cutting Safety-Hot Work (CCR 3203, 4794-4799, 4848(a), 1537(a)) Initial, every
Wheels or Rims - Servicing (CCR 3326(c)) Initial
Workplace Violence

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Appendix B – Retention Schedule

The following table contains an excerpt from the larger Stanislaus State Records Retention Schedule. Only documents relevant to training records are included below.

**California State University
RECORDS/INFORMATION RETENTION AND DISPOSITION SCHEDULE**

Record Series Identifier	Record Series Name								
3.0	ENVIRONMENTAL HEALTH & SAFETY								
Record Identifier	Record Title	Custodian of Records	Record Value: O - Operational F - Fiscal L - Legal H - Historical V - Vital					Retention Source Authority	Retention Period
			O	F	L	H	V		
3.20	CPR Training Records		X					CSU Best Practice	1 year
3.21	Defensive Driver Training				X			SAM MM07-05 CSU Use of University and Private Vehicles Policy Guidelines pp4-5	4 years
3.22	First Aid training records				X			29 CFR 1910.1030	3 years
3.23	Hazardous waste training records				X			CCR Title 22 §66264.16 (e)	As long as employee remains at the facility or for three years following departure.
3.24	Employee training records, excluding hazardous waste training records		X					CCR Title 8	3 years
3.25	Student training records		X					CSU Best Practice	3 years

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Appendix C – Job Hazard Analysis

 Stanislaus State <small>SAFETY AND RISK MANAGEMENT</small>		Injury & Illness Prevention Program Job Hazard/Safety Analysis	
		<small>One University Circle, Turlock, California 95382 Phone: 209-867-3037 • www.csustan.edu/srm/ehs</small>	
Task #:		Date:	
Picture of task/equipment:		Task:	
		Department:	
		Person(s) performing the task:	
		Analyzed by:	
		Reviewed by:	
		Duration:	
Required PPE:			
Required/Recommended Trainings:			
STEPS	HAZARDS	CONTROLS	
		•	
		•	
		•	