

**University of Texas at San Antonio  
Office of Environmental Health, Safety and Risk Management**

**Occupational Health Management Plan**

i. Review and Signature Page

This Occupational Health Program has been reviewed for regulatory compliance and best management practices by the undersigned individuals and is hereby adopted for use and compliance by all employees at The University of Texas at San Antonio (UTSA).

PRINTED NAME	SIGNATURE	TITLE	DATE
J. Brian Moroney	Signature on file	Director, EHSRM	7/13/2015
Kristee Phelps	Signature on file	Occupational Health & Wellness Manager	7/13/2015
Rebecca Stenberg	Signature on file	Occupational Health Coordinator	7/14/2015

Original: 7/01/2015

ii. Table of Contents

i. REVIEW AND SIGNATURE PAGE ..... 2

ii. TABLE OF CONTENTS..... 3

iii. EMERGENCY PROCEDURES AND CONTACT INFORMATION ..... 4

I. OVERVIEW ..... 5

II. SCOPE ..... 5

III. PERIODIC REVIEWS..... 5

IV. RESPONSIBILITIES..... 6

V. OHP COMPONENTS/REQUIREMENTS..... 7

VI. ENROLLMENT STATUS..... 9

### iii. Emergency Procedures and Contact Information

#### I. Reporting a Work Related Injury

Any occupational exposure, injury, illness, animal bite or scratch, needle stick, allergic reaction, accident, etc., must be reported immediately to UTSA supervisor. Incidents requiring immediate treatment should be referred to an urgent care clinic or the hospital emergency room as appropriate. For specific information on the process for reporting a UTSA work related injury, please refer to the WCI manual on the EHSRM website.

#### II. Contact Information

For more information about the WCI plan, contact:

Primary:

Randy Spencer  
Worker's Compensation Office  
Risk & Life Safety Analyst  
SFB 1.104C  
210-458-8178  
[randy.spencer@utsa.edu](mailto:randy.spencer@utsa.edu)

Alternate:

John DeLaHunt  
Risk and Life Safety Manager  
SFB 1.104B  
210-458-4420  
[john.delahunt@utsa.edu](mailto:john.delahunt@utsa.edu)

Alternate:

J. Brian Moroney  
Director, EHSRM  
SFA 1.102A  
210-458-5250  
[brian.moroney@utsa.edu](mailto:brian.moroney@utsa.edu)

For more information about the Occupational Health Program and its implementation, contact:

Primary:

Rebecca Stenberg  
Occupational Health Coordinator  
BRG 1.102  
210-458-5304  
210-458-4038  
[Rebecca.stenberg@utsa.edu](mailto:Rebecca.stenberg@utsa.edu)

Alternate:

Kristee Phelps  
Occupational Health &  
Wellness Manager  
SFB 1.104D  
210-458-6102  
[Kristee.phelps@utsa.edu](mailto:Kristee.phelps@utsa.edu)

## I. Overview

The University of Texas at San Antonio (UTSA) is committed to establishing and maintaining an Occupational Health Program (OHP or Program when referring to animal care and use) that eliminates or reduces existing or potential hazards in the workplace.

The UTSA Occupational Health Program (OHP) provides oversight, management, and mitigation of health risks to university personnel who are exposed to animals, their viable tissues, body fluids, or wastes, and employees exposed to certain biological, chemical, and physical hazards. The OHP in place is consistent with federal, state, and local regulations and is an essential part of the overall program of animal care and use (CFR 1984a, b, c; DHHS 2009; PHS 2002).

For the purposes of services offered to animal handlers under this program, the term “employee” shall include students and volunteers where appropriate. A separate but equal program exists for students/volunteers. Anywhere student or volunteer program coverage is mentioned in this document, it will be arranged by Laboratory Animal Resources Center (LARC) personnel under a separate contract with a third party administrator. Students/volunteers are seen for occupational health medical services at the same physical location as employees, which is the Employee Occupational Health and Wellness Center.

## II. Scope

This plan applies to all faculty and staff at The University of Texas at San Antonio with occupational risks, as identified by Environmental Health, Safety and Risk Management (EHSRM). Such risks may include work with hazardous biological, chemical, and physical agents including employees who work with laboratory animals. The program also applies to students and volunteers involved with animal research AND listed on an Institutional Animal Care and Use Committee (IACUC) protocol.

## III. Periodic Review

### A. REVIEW PERIOD

This plan shall be reviewed periodically but at least every three years or more often as needed to incorporate regulatory changes or review of new procedures.

### B. REVIEW PARTICIPATION AND LEADERSHIP

EHSRM will lead the review process with input from other campus areas such as:

1) UTSA Lab Animal Resource Center (LARC). Special attention will be requested from the UTSA veterinarian to assure needs/requirements of Association for the Assessment and Accreditation of Laboratory Animal Care International (AAALAC) are fully included in the program.

2) IACUC Committee Chair may have the option of participating in the review.

## IV. Responsibilities

### A. ENROLLEE RESPONSIBILITY

Mandatory enrollment for certain job functions ensures that UTSA follows certain state and federal regulatory requirements. The individuals with identified hazards that require OHP enrollment are listed below and further defined on the OHP website: <http://utsa.edu/safety/>.

Depending upon the occupational exposure, an employee may also be required to complete related safety facilities training prior to working with hazardous materials or being allowed access to high-risk work areas.

For employees who work with laboratory animals, the requirements of this program are based on the guidelines in the 2011 NIH Guide for the Care and Use of Laboratory Animals. All individuals listed on an animal study protocol must initiate the OHP enrollment process prior to IACUC submission. OHP clearance/enrollment can be completed concurrently with the IACUC review approval process. However, official IACUC approval cannot be given unless the OHP enrollment requirements are met. Principle Investigators (PIs) and research staff are to complete the following forms to initiate and maintain enrollment:

- Risk assessment form (initial AND annual update)
- Hepatitis B vaccine disclosure form (mandatory)
- Animal allergy questionnaire

Further services may be determined to be necessary by OHP to obtain clearance/enrollment. For additional information on the required forms for OHP enrollment, please see the EHSRM website <http://utsa.edu/safety/#/occupational>

### B. OPERATIONAL RESPONSIBILITIES

EHSRM will:

- Develop and manage the OHP consistent with federal, state, and local regulations
- Review federal guidelines and integrate changes into the UTSA program
- Coordinate with the appropriate division Coordinator / Safety Specialist to perform a Job Hazard Assessment
- Report/track employees in the OHP as required.
- Monitor the requirements for personnel with substantial animal contact
- Provide oversight of the IACUC Occupational Health Subcommittee
- Serve as liaison between Occupational Medicine Provider and the IACUC

Contracted Occupational Medical Service Provider will:

- Provide physical examinations and medical direction
- Provide medical directives to include administration of appropriate immunizations, lab work, and other medical tests as needed such as PFT's and respiratory fit testing
- Provide consultation to determine risks associated with hazards
- Review medical records (provide medical approvals and clearances to work)
- Serve as medical director for AED program for UTSA, managed by EHSRM
- Provide a registered nurse per the contract schedule to assist with service delivery

Principal Investigators, Supervisors, and/or other responsible individuals will:

- Ensure all individuals working in areas with occupational exposure are enrolled and participating fully in the OHP
- Ensure all students, consultants, and visitors participating in direct care of animals or their viable tissues, body fluids, or wastes, and their living quarters, are participating in this program
- Inform OHP of their employees who will begin working in areas with occupational health risks this program addresses and those who no longer work in those areas
- Ensure that any employee who develops signs or symptoms associated with an occupational exposure are provided an opportunity to receive appropriate medical care
- Work with EHSRM to identify and implement engineering/administrative controls and work practices to reduce the potential for exposure to hazards

## V. Occupational Health Program Components/Requirements

### A. PERSONNEL ENROLLMENT REQUIREMENT

Mandatory Enrollment in the UTSA OHP is required for the following risk groups (employees who work in areas that are at a high risk of contact with certain chemicals, biological agents, radiation and/or animals and/or certain physical hazards):

- BSL-3 / ABSL-3 High Containment Lab Personnel
- Bus and other certain drivers requiring a commercial driver's license (CDL)
- Hazmat Team
- Student Health Services Staff
- Respirator Users
- Employees covered under the Bloodborne Pathogens Exposure Control Program
- Animal Handlers\*\*
- Child Development Center (childcare workers)

\*\*All individuals listed on a research or teaching Animal Use protocol and any individual through their employment who has contact with or exposure to live animals are required to enroll in the OHP prior to beginning their work or contact with animals

## B. REQUIREMENTS FOR ENROLLMENT

Employees must provide certain information to allow prudent medical surveillance of occupational health risks in the workplace. This information includes, but is not limited to:

- Risk Assessment (initial enrollment)
- Vaccination History (initial enrollment)
- Hepatitis B Disclosure Form (initial enrollment)
- Completed Allergy Questionnaire (required for animal handlers only)
- Annual Update Questionnaire (within 13 months of initial enrollment)
- Respiratory Questionnaire (those with mandatory respirator use)
- Health Assessment (optional)

## C. MEDICAL SURVEILLANCE

EHSRM Coordinators / Safety Specialists with knowledge in relevant disciplines, identify potential hazards in the work environment, conduct critical assessments of the associated risks, and develop procedures to manage risks. The OHP operates under a premise of medical surveillance, which allows the program's Licensed Health Care Professional/Provider (LHCP) to assess an employee's health risks through medical and work histories, physical assessment and biological testing to establish a baseline in order to monitor future health as it relates to their potential exposures to occupational hazards.

Medical services provided by the OHP include but are not limited to:

- Physical exams (pre-placement and periodic)
- Medical evaluations for Hazmat team, BSL-3, and certain other research team members
- Immunizations and serologies when necessary
- Pulmonary function tests
- Respiratory fit training and testing
- Lab animal allergy education
- Species specific training with diseases communicable animals to humans
- Training/education for immune compromised individuals and precautions for females
- TB screening upon hire and periodically for Child Development Center employees and per protocol requirements for research faculty/staff



- TB screening for all Student Health Services staff, per the CDC Guidelines for Preventing the Transmission of *Mycobacterium tuberculosis* In Health-Care settings, 2005
- Hazmat and BSL-3 exit evaluations as requested
- “Fitness for Duty” evaluations to include BSL-3 suitability assessments, Hazmat evaluations, and others designated by the occupational health coordinator

Vaccination is recommended if research is to be conducted on infectious diseases for which effective vaccines are available. The OHP ensures that the risks associated with animal work are identified and reduced to minimal and acceptable levels. The OHP involves coordination between the researcher (Investigator), IACUC, EHSRM, and the occupational health program clinical component.

#### D. OCCUPATIONAL EXPOSURES

EHSRM has evaluated the medical surveillance needs of job classifications throughout UTSA. At a minimum, UTSA provides medical surveillance and/or service for the following types of hazards/exposures:

- Animal Handling risks (including animal living quarters, viable tissues, body fluids, or wastes)
- Bloodborne pathogens exposures
- Vaccine preventable occupational related illnesses
- Commercial Driver Fitness Determination medical exam, Department of Transportation
- Respiratory Exposures (animal allergens, chemicals, dusts, or biological agents)
- Noise Exposure

#### E. CONFIDENTIALITY

All information that employees provide to the OHP is protected from unauthorized or indiscriminate release of personal health information. Medical records are maintained in a confidential manner. Confidentiality and other medical and legal factors must be considered in the context of appropriate federal, state, and local regulations.

### VI. Enrollment Status

The OHP has different levels of enrollment/involvement. Individual participation may vary depending on UTSA employment status and potential level of risk.

#### A. ACTIVE

- Employees who have provided some, but not all, initial enrollment information are active in the program.
- Non-UTSA research personnel who have provided a “letter of equivalency” from their employer and have completed UTSA risk assessment are active in the UTSA program

- Non-UTSA personnel unaffiliated/community members, serving on the IACUC shall be covered under the UTSA Occupational Health Program

#### B. ENROLLED

- Employees who have provided all initial enrollment information are fully enrolled in the program
- Volunteers who have provided all completed initial enrollment information and who are set up as a Volunteer (POI) with Human Resources

#### C. MEDICAL APPROVAL OR CLEARANCE TO WORK

- OHP medical services staff provide medical approval or clearance to work for enrolled employees
- Medical approval is based on enrollment information and the medical staff's knowledge of the occupational health risks the OHP is designed to mitigate
- Approvals expire at the end of the calendar month of issue, not less than one year after issuance
- Animal handlers receive clearance to work in the vivarium once enrollment requirements are met
- Renewal of approvals may require additional updated medical information from enrolled employees

#### D. MEDICAL HOLD

- Enrolled employees with prior medical approval, who, per occupational physician review of current temporary medical conditions, are not approved to work in areas where their medical condition places them at increased risk of exposure or infection.
- Examples of this category level may include employees receiving radiation therapy or using immuno-suppressant drugs as part of ongoing therapy.

#### E. INACTIVE

- Employees who no longer have job duties that include exposure to work areas with occupational health risks mitigated by this program are inactive in the program.
- Employees whose initial need for vaccination(s) has been completed and they no longer require medical surveillance
- Employees who have left UTSA
- Employee records are kept for term of employment plus thirty years