

Injury and Illness Prevention Program (IIPP)

Responsible Administrator: Safety and Injury Prevention Division
Revised: March 2024

Summary: This section outlines the policy and procedures related to the Injury and Illness Prevention Program (IIPP) that is administered through the Environmental Health and Safety (EHS) 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 (UC Irvine) 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 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 and Safety (EHS), 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 and Safety (EHS)

- 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 (Safety Representative), within each work unit under their management is designated to partner with EHS 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 EHS, Supervisors are responsible for implementing the UC Irvine Injury and Illness Prevention Program. Supervisors implement the IIPP through the following actions:

- Identify a [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 EHS safety courses offered.

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 the IIPP.

3.5 Employee Responsibilities

The Safety on Site (SOS) program 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 EHS required training identified by the Safety Training Self-Assessment (STSA) in the [UC Learning Center](#) , including Safety Fundamentals, Laboratory Safety Fundamentals, or School of Medicine Annual Training.
- Know who is the designated 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 EHS.

3.6 Safety Representative (SR)

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

- Complete all EHS required training identified by the STSA in the [UC Learning Center](#) every three (3) years and for new employees.
- 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 EHS required training.

Conduct and/or coordinate work unit specific training for all employees in your work unit.

- 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 EHS.
- Keep informed about conditions that may impact your health and safety.

Participate in EHS [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 EHS 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:
 - [EHS 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 workplace hazards, including scheduled periodic inspections to identify unsafe conditions and work practices. EHS 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
- Workstation Ergonomic Evaluations
- Work Unit Inspection Tools
- Laboratory Safety Inspection Checklist
- Self-Inspections for Labs Checklist
- Title 19 Inspection Program

UC Irvine has developed a COVID-19 Prevention Plan ([Appendix A - University of California, Irvine 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.

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, EHS, 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. 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 EHS training courses can be found within [UC Learning Center](#).

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.

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.

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. EHS reviews online incident reports. Incident reports and EHS investigations are documented and filed with EHS 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 & Appendices

UC Irvine:

[Training Schedule and Registration](#)
[Report a Safety Concern/Near Miss](#)
[Report a Work-related Injury or Illness](#)

State Agencies:

[California Division of Occupational Safety and Health \(Cal/OSHA\)](#)
[California Environmental Protection Agency](#)
[California Air Resources Board](#)

Appendices:

[Appendix A - University of California, Irvine COVID-19 Prevention Plan](#)

Appendix A

University of California, Irvine COVID-19 Prevention Plan

Revised: March 2024

Summary: The University of California, Irvine’s COVID Prevention Plan addresses the Cal/OSHA emergency COVID-19 Prevention Regulation, 8CCR 3203.

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1. Identification and correction of COVID-19 hazards

The campus identifies and evaluates COVID-19 hazards and correction of hazards from submitted safety concerns from campus, including COVID-19 related whistleblower complaints. Leadership of these units are notified of hazards and unsafe behaviors and expected to resolve them by communication to unit employees. Repeated COVID-19 safety concerns are elevated to campus Senior Leadership.

Campus units working on campus during the first 16 months of the COVID-19 pandemic have submitted Return to Work plans and completed a [Risk Assessment, Protection, and Monitoring Plan](#). The submitted plan included a physical assessment of the workspace performed by EHS. Non-Research plans were submitted to the Campus Recovery Implementation Team (CRIT) for approval. Research plans were submitted to the Office of Research for approval. Starting July 1, 2021, units are instructed to complete a [COVID-19 Prevention Checklist](#), reviewing all of the information with their staff, and attesting to following COVID-19 control measures, taking COVID-19 Returning to Campus training, COVID-related information contained on the [UCI Working Well](#) website, and all current campus Executive Directives.

In addition to following the regulations set forth by Cal/OSHA, UCI frequently consults other regulatory agencies (i.e., California Department of Public Health (CDPH), Centers

for Disease Control (CDC), Orange County Health Care Authority (OCHCA)) for changes and guidance on COVID-19 related information. UCI also references the California State Guidance for Institutes of Higher Education document for additional information.

2. Investigation of COVID-19 positive cases, including communication to potentially exposed employees

Investigation of COVID-19 cases at UCI, including giving notice to all exposed employees within one business day to meet compliance with the Cal/OSHA COVID-19 Prevention Non-Emergency Regulations, follows the following process:

Positive or suspected COVID-19 case notifies UCI in one of several methods:

- a. Through the COVID-19 Intake Questionnaire, form available at: [Intake Questionnaire](#)
- b. By contacting the COVID-19 Response Center at covid19@uci.edu or (949) 824-9918
- c. By notifying their supervisor of their status

After the form is completed by the employee, notification is sent to Contact Tracing.

EHS assigns the positive case to an EHS representative for investigation, who determines and recommends control measures that should be taken in the workplace. Investigation questions are completed by EHS staff:

Employee Name:
Title:
Email:
Department:
Supervisor Name:
Supervisor Email:
Supervisor Phone:

Essential Worker: Critical worker identified under the department's continuity of operations plan whose work cannot be completed remotely for any duration of their work hours.

Yes No

Represented Worker Yes No

Case Last Day On-Site:
Date of
Onset:
Description of Incident:
Potential Route of
Exposure: Supervisor
Response:

Check all control measures in place:

- Physical Distancing
- Signage
- Communications
- Barrier/Space Assessment
- Training
- Face Covering
- Other

Covid-19 Returning to
Campus Training Yes

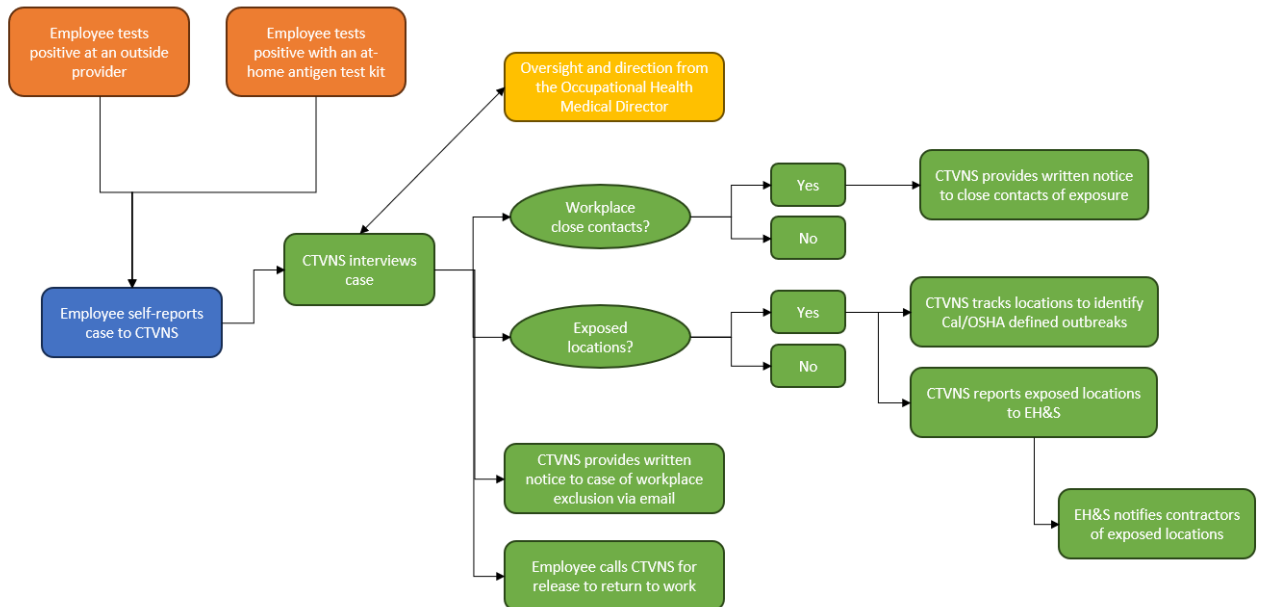
No

EHS Recommendations

- Physical Distancing
- Signage
- Communications
- Barrier/Space Assessment
- Training
- Face Covering
- Other

UCI Contact Tracing follows the attached flowchart after being notified of a positive COVID-19 case:

UCI COVID-19 Contact Tracing Staff & Faculty Flowchart



Written notification, required from the positive COVID-19 case which resulted in COVID-19 exposed workplace(s), applies to all campus non-healthcare workers including student employees, staff, faculty/academics, and employers of contractors is via daily email if there were previous positive cases. As a result of contact tracing investigations, Contact Tracing provides a list of exposed workplaces to Strategic Communications and maintains records for five years, according to UCOP policy.

Individual employee written notification for anyone who may have had a COVID-19 exposure applies to all campus employees. Communication is in the form of a written letter to employees deemed as having close contact to a positive COVID-19 case. Contact Tracing will maintain these records for five years based on UCOP policy.

Contact Tracing will use the process above for any employee who tests positive.

Contractor/Vendor Communication:

All contractors/vendors are notified via email about all locations where there may be a potential COVID-19 exposure. Contractors are instructed to contact Contact Tracing (contacttracing@uci.edu) or at (949) 824-2300 with the names of any UCI persons who may have been exposed by a contractor with a confirmed COVID-19 positive case. This information will contain the names of the affected individuals, infectious periods, and campus work locations. Contact Tracing will obtain the applicable information and identify any campus locations of potential COVID-19 exposure and these locations are included in the email sent to contractors/vendors.

3. COVID-19 Training

COVID-19 training content has been developed and is available in an online course for UCI campus employees: [Returning to Campus Training // Environmental Health & Safety // UCI](#)

Campus employees are required to take this training as directed by Cal/OSHA non-emergency standard for COVID-19.

Returning to Campus COVID-19 training content includes:

- What COVID-19 is, how it spreads and how to identify the symptoms;
- The importance of healthy hygiene practices, including but not limited to hand washing, and routine surface cleaning;
- The fact that particles containing the virus can travel more than six feet, especially indoor, so physical distancing, face coverings, increased ventilation indoors, and respiratory protection decrease the spread of COVID-19 but are most effective when used in combination.;
- Information on face coverings, process on providing respirators, and information on how to obtain a voluntary use respirator, commonly known as

- N95s, how to properly wear and perform a seal check, and that upon request, employees may obtain these around various locations on campus.
- UCI's Working Well program, which helps employees identify potential COVID-19 symptoms on a daily basis and provides guidance on seeking medical care;
- Who to contact in the event of a positive case;
- Websites and additional resources to help keep employees up to date on UCI's policies regarding COVID-19; and
- Supplemental modules for employees working in specific job functions at UCI.

For employees who have taken the COVID-19 Returning to Campus training prior to

June 30, 2021, supplemental information related to COVID-19 protection measures and controls was distributed via the EHS website: <https://ehs.uci.edu/>

Aerosol Transmissible Disease Training

Aerosol Transmissible Disease (ATD) training is available to any UCI employee who performs cleaning and disinfecting activities related to COVID-19 control measures. This training is conducted by EHS staff. ATD training and Bloodborne Pathogens (BBP) training is also provided to all Student Health Center employees. This training is conducted by EHS staff and is also available in UC Learning Center.

4. Face Coverings

A "compliant face covering" is defined as a surgical mask, a medical procedure mask, a respirator worn voluntarily, or a tightly woven fabric or non-woven material of at least two layers. Face coverings must not have visible holes or openings and must cover the nose and mouth. Face coverings do not include a scarf, ski mask, balaclava, bandana, turtleneck, collar, or single layer of fabric.

Regardless of vaccination status, UCI continues to provide face coverings and voluntary use respirators to all employees if requested. Voluntary use respirators, commonly known as N95s, are available to all employees upon request. The UCI Logistics Team has stocked face coverings for all UCI employees and EHS and Facilities Management distribute to campus departments, via several campus distribution locations, and as requested. Additionally, HR has created a process to evaluate medical accommodations and provides an alternate face covering that is non-restrictive.

Information on how to obtain a face covering or a voluntary use respirator is provided on EHS' webpage: [Face Coverings and Voluntary Use Respirators \(N95s\) // Environmental Health & Safety // UCI](#)

5. Engineering controls, administrative controls, and PPE

UCI implements COVID-19 control measures that follow the hierarchy of controls: engineering controls, administrative controls, and personal protective equipment (PPE).

Engineering controls currently in place:

- Facilities Management maintains campus buildings with appropriate Minimum Efficiency Reporting Value (MERV)-rated filter and maintains Heating Ventilation and Air Conditioning (HVAC) systems with the appropriate air changes per hour and replaces filters, as necessary.
- Plexiglass partitions and barriers are available upon request as a result of a minor or major outbreak.

Administrative controls currently in place:

- Hazard assessments have been conducted for all cleaning activities. Appropriate training and PPE recommendations have been shared with these departments.
- Proper handwashing information is provided to the campus community.
- For positive COVID-19 cases, decontamination is based on the last day the individual was on site and how long the space can be left unoccupied. UCI follows CDC recommendations on disinfection after a space was occupied by a COVID-19 positive individual.

PPE controls in place:

- Based on the hazard assessments conducted for cleaning activities, appropriate PPE has been recommended and has been provided to custodial employees. Disposable nitrile gloves and safety glasses are required to be worn when performing cleaning activities.

6. Keep potentially exposed employees away from the workplace

Positive employees are not allowed to return to work based on set criteria from the California Department of Public Health (CDPH).

A COVID-19 positive case may return to work when all of these conditions are met:

- At least 24 hours have passed since a fever of 100.4 or higher has resolved without the use of fever-reducing medications;
- COVID-19 symptoms are mild and improving

7. Multiple and major COVID-19 infections and outbreaks

Definitions (abbreviated and not exclusive):

- “COVID-19 case” is a person who has a confirmed positive case, is subject to an order to isolate, or has died as a result of COVID-19.
- “COVID-19 exposed workplace” is a worksite or work area location the COVID-19 case used or accessed during the high-risk exposure period.
- “COVID-19 exposure” means physical or close contact with a COVID-19

case (greater than or equal to 15 minutes cumulatively over a 24-hour period).

- “Minor Outbreak” means 3 or more employee cases in an exposed workplace within a 7-day rolling period and continues until there are 0 cases for 14 days. Epidemiology links are now included per CDPH guidance.
- “Major Outbreak” means 20 or more employee cases in an exposed workplace within a 30-day period and continues until there are 0 cases for 14 days.
- Hazard assessments have been conducted for all cleaning activities. Appropriate training and PPE recommendations have been shared with these departments.
- Proper handwashing information is provided to the campus community.
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PPE controls in place:

- Based on the hazard assessments conducted for cleaning activities, appropriate PPE has been recommended and has been provided to custodial employees. Disposable nitrile gloves and safety glasses are required to be worn when performing cleaning activities.

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