USC University of Southern California

Injury and Illness Prevention Program (IIPP)

Facilities Planning & Management

Updated April 4, 2022

USC Environmental Health & Safety

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1. About the IIPP

The Policy

In California, every organization with 10 or more employees is required to have a written Injury and Illness Prevention Program (IIPP) in place. Facilities Planning & Management (FPM) is committed to making this IIPP an effective tool for maintaining a safe and healthy work environment and ensuring full compliance with all applicable occupational safety and health regulations. This Injury and Illness Prevention Plan (IIPP) complies with the California Occupational Safety and Health Administration (Cal/OSHA) requirement to develop a written IIPP (CCR Title 8, Section 3203) and includes all the required elements of an IIPP.

FPM strives to continually improve our health and safety performance and to always perform our work in a professional, productive, safe, and high-quality manner. Safety is a daily commitment and investment in our organization. It is our vision that every employee understands their role and is fully engaged in maintaining a safe and healthy work environment. We have adopted a comprehensive plan to carry out that vision to achieve our goal of eliminating unsafe practices and conditions that may result in harm to people and/or the environment.

Further, it shall be the policy of FPM to promote excellence in our health and safety performance using these guiding principles:

- We give employees the authority to stop unsafe practices, to stop work if necessary, and to inform supervisors immediately without fear of reprisal when unsafe conditions are present.
- We comply with all applicable environmental, health, and safety regulations to ensure the safety of the public and that of our employees and partners.
- We strive to provide a workplace free from known and recognizable hazards.
- We take prompt action to correct or control unsafe conditions / work practices.
- We provide the necessary tools, equipment, and training for employees to perform their work in a safe manner.
- We promote safety awareness by implementing a Behavior-Based Safety Program.
- We investigate all significant incidents, conduct a root cause analysis, and communicate lessons learned to the employees.
- We continually improve our health and safety performance and evolve our safety culture.
- We integrate health and safety considerations into business planning, decision making, and daily activities.
- We maintain appropriate standards and procedures to address and support all phases of this policy, with periodic review to assure its effectiveness in meeting regulatory compliance.
- We operate under the philosophy that quality, safety, and productivity complement each other. To that end, compliance with the Health & Safety Program is always required.

Compliance

We are all responsible for using safe work practices, following applicable policies/procedures, and taking ownership of our roles as listed in the next section. To ensure to we comply with the rules and maintain a safe work environment, we must:

- Keep everyone informed of the IIPP.

- Evaluate safety performance.

- Recognize safe work practices (via performance evaluations or incentive programs).

- Provide training to employees whose safety performance is deficient.

- Take corrective action against those who do not comply with safe work practices.

2. Responsibilities

We all serve an important role in preventing injuries/illness and maintaining a safe, hazard free work environment. Therefore, this IIPP is most effective when we all take ownership of our responsibilities and implement all the elements properly.

Everyone fits into one of the categories of roles in this section. Please review your category so you fully understand your responsibilities and can take an active role in keeping yourself and the USC community safe.

Senior Administration and Leadership

USC's senior administration and leadership (referred to as **senior leadership** in the IIPP) is responsible for exemplifying their commitment to keeping USC a safe and healthful workplace by providing the support and guidance needed to keep injury and illness prevention a priority.

FPM Vice President

The FPM Vice President provides leadership and assumes overall responsibility to:

- Implement, maintain, and monitor the performance of the FPM Health and Safety (H&S) Program
- Provide appropriate financial and organizational resources to adequately support the FPM H&S program
- Implement, operate, review and update/correct the H&S Program
- Establish accountability and delegate authority for continual improvement of an effective H&S Program
- Integrate the H&S Program into all of FPM's business systems and processes

FPM Chief Safety Officer

As delegated by the FPM Vice President, the FPM Chief Safety Officer is the delegated IIPP administrator and is also responsible for the overall technical direction, management, and implementation for FPM's H&S Program. The FPM Chief Safety Officer reports to the Associate Vice President Controls, Finance, and Administration. Responsibilities of the Chief Safety Officer, working concurrently with the FPM health and safety team and the Human Resources business partners, include:

- Provide centralized monitoring of FPM's business operations related to implementation of the FPM H&S Program.
- Develop, plan, implement and sustain the FPM H&S Training Program, including but not limited to, managing the overall function and effective use of the organizational Learning Management System (LMS), including Trojan Learn.

- Maintain H&S records consistent with USC policy and regulatory mandates.
- Verify that periodic safety inspections are performed in compliance with regulatory requirements and assisting management staff in identifying unsafe or unhealthful conditions.
- Interpret existing or pending H&S legislation and recommend appropriate compliance strategies to FPM personnel.
- Investigate and evaluate all accidents that result in serious injury or fatality for FPM personnel/ projects, determine corrective actions required, and assisting in communicating and implementing corrective actions.
- Work with USC's Environmental Health & Safety Department, Human Resources business partners, FPM Safety Committee, Risk Management Department, Workers' Compensation Department Insurance Broker and Worker Compensation and Disability Department, and our Owner-controlled Insurance Program (OCIP) to determine effective methods of communications to minimize worker injury/illness losses.
- Act as the technical liaison for the FPM Health and Safety Committee.
- Address health & safety for FPM personnel, project sites, and in office environments, make recommendations, provide written guidance, and direct training, as appropriate.
- Conduct at least an annual review of this document and ensure the current version is available on the FPM website.

FPM Safety Team

Working concurrently with the FPM Chief Safety Officer, the FPM Safety Team assists in the overall planning, implementing, and sustaining of the activities and operations of the FPM H&S Program. The team focuses on FPM H&S initiatives, activities, and programs.

Additional key FPM Safety Team responsibilities include:

- Authorizing FPM H&S/training programs that comply with applicable regulatory requirements and are consistent with USC policy.
- Assists to verify that all H&S Program elements are implemented at the appropriate organizational level to help ensure FPM and its contractors maintain continual regulatory compliance.
- Assists in establishing H&S training requirements based on analysis of federal, state, and local regulatory requirements, and USC H&S program policy.
- Performs periodic reviews, evaluations, and modifications of applicable H&S program elements (e.g., standard operating procedures, templates, forms etc.).
- Supports, implements, and sustains the FPM safety culture and provides assistance to the FPM Chief Safety Officer related to management of applicable Behavior-Based Safety program elements (i.e., SAFE observations).
- Assists in the development of internal H&S audit processes to verify compliance with USC H&S program and regulatory agency requirements and facilitate the implementation of applicable corrective actions.
- Investigates and evaluates worker incidents (injuries, illnesses and/or vehicle incidents) and near-misses.
- Documents all investigative findings, producing an accident investigation report, and determining the appropriate corrective actions and the responsible person(s) for their implementation.
- Assists the FPM Chief Safety Officer with the technical liaison support for the FPM Health and Safety

Committee through on-going mentoring and written communication.

- Reviews and develops project-specific health and safety plans (HASPs).

Department Heads and Directors

Department heads and directors (referred to as **department heads** in the IIPP) have the primary responsibility for verifying the IIPP is in place to serve its purpose of keeping their staff safe. To accomplish this, department heads will:

- Verify communication of the IIPP to employees and visitors to implement the requirements of the IIPP.

- Verify individuals under their supervision have received training required by the IIPP.

- Work with the FPM H&S Team to implement and sustain injury prevention and safety programs.

- Include health and safety performance, consistent with the USC Contractor Safety Management Program requirements, when evaluating suppliers and contractors as applicable.

- Assist in maintaining the FPM business continuity, and disaster preparedness plans and providing clear responsibilities for all personnel to coordinate effectively with emergency responders.

- Report unsafe or unhealthy working conditions and non-compliant behavior with the program, ensure they are investigated, and appropriate corrections are made.

- Verify appropriate and timely action is taken in response to audits, incident investigations, safety suggestions made by the FPM Safety Team and/or Committee, and corrective improvement strategies derived from behavior-based observations.

- Verify appropriate representation of their respective work group is part of the FPM Safety Committee.

- Verify employees participate in the behavior-based safety program by achieving goals related to observations in the field or office.

- Verify applicable resources are provided to ensure effective implementation of the FPM H&S Program.

IIPP Administrator

The FPM Chief Safety Officer is FPM IIPP Administrator and has the overall responsibility for the continuing development and implementation of the FPM IIPP.

Office of Environmental Health & Safety

Visit the EH&S Website to learn more about EH&S services and programs.

The Office of Environmental Health and Safety (EH&S) is our partner in developing the IIPP and will maintain/update the IIPP template as necessary. Working collaboratively with EH&S, they serve as consultants in every aspect of keeping your unit a safe and healthful place to work. To accomplish this, EH&S will:

- Provide guidance and technical assistance in identifying, evaluating, and correcting safety and health hazards.

- Provide assistance to develop training and outreach materials.

- Perform classroom training and provide training assistance.

- Conduct/assist with inspections and accident/incident investigations as needed.

- Provide assistance to conduct industrial hygiene sampling.

- Provide assistance to develop written guides and policies (known as "written programs").

- Participate in emergency response as required.

- Provide assistance to analyze injury and illness data, monitor trends, and make recommendations as needed.

- Monitor compliance with regulatory requirements.

Managers, Supervisors and Principal Investigators

Employees look to their managers and supervisors (referred to as **managers** in the IIPP) to exemplify safe and healthful practices encouraged by the IIPP. To maintain and fulfill the elements of the IIPP, managers will:

- Partner with the FPM Safety Team to develop the IIPP and implement relevant FPM H&S procedures.
- Verify employees are receiving their required H&S training as defined in the FPM H&S training matrix.
- Verify employees are assigned appropriate personal protective equipment (PPE) for their job function(s) and trained on the proper use and maintenance.
- Recommend and implement safety and health improvements.
- Assist in the development and implementation of safe work procedures and practices such as Standard Operating Procedures (SOP), Job Safety Analysis (JSA), etc.,
- Investigate accidents / incidents and implement corrective actions.
- Coordinate safety inspections with the FPM Safety Team.
- Immediately stop work that poses an imminent hazard.
- Immediately report serious injuries and verify employees report work-related injuries/illnesses and safety and health issues.
- Participate in Safety Committee activities as required.
- Model and enforce safe and healthy work practices.
- Take corrective action when employees do not comply with safe work practices.
- Maintain documentation of training, safety activities, inspections, and incident investigations as applicable.

FPM Project Managers (PMs)

Project Managers (PMs) are defined as anyone who procures a third-party to perform contract work. PMs play an important role in verifying project-specific health and safety elements are properly implemented, both before a project is proposed and after it is awarded:

- At the proposal stage, PMs, working with the FPM Safety Team, should evaluate which health and safety considerations, if any, are presented by a project. PMs are encouraged to consult with the FPM Chief Safety Officer regarding the decision whether to develop a Site-Specific Health and Safety Plan (SSHASP) and what elements might be necessary.

- When a new project requiring a SSHASP is awarded, the PM is responsible for seeing that an appropriate SSHASP is developed. If the PM lacks expertise in a given area, the PM should consult with

knowledgeable persons such as the FPM Safety Team.

- During project performance, the PM shall require all USC personnel and contractors to comply with the SSHASP and applicable regulations and to fulfill their safety responsibilities.
- The PM is also responsible for verifying that field personnel receive all necessary training, materials, and equipment necessary to safely complete the project scope; and that they have been included in the medical surveillance program (as appropriate). PMs are encouraged to periodically check on staff compliance with health and safety plan requirements.
- The PM shall verify that the applicable elements of the USC Contractor Safety Management Program are being implemented correctly.

Employees

Employees include full/part-time staff, student workers, volunteers, and contractors. They are responsible for knowing safety and health regulations for their duties and actively participating in safe work practices. Employees are encouraged to provide suggestions or comments on any part of the FPM H&S Program, without fear of reprisal. Employees are also encouraged to first discuss related questions with their immediate supervisor and/or the FPM Safety Team. If issues arise that cannot be addressed in this manner, the situation can be discussed with the FPM Chief Safety Officer.

Employees will:

- Use appropriate PPE as necessary.
- Learn about the potential hazards of assigned tasks and request more information as needed.
- Actively participate in all required safety and health training as defined in the FPM H&S Training Matrix.
- Comply with health and safety policy, signage, warnings, and directions.
- Report all unsafe conditions and accidents promptly to managers/supervisors.
- Report defective equipment and other hazards to their manager/supervisors.
- Participate in incident investigations and workplace safety inspections as required.
- Notify their manager/supervisor if unsure about receiving a type of training, medical examination, or other health and safety practice.
- Notify their manager/supervisor if unsure how to apply a health and safety requirement.
- Participate in the Behavior-Based Safety Program by making SAFE observations, correcting at-risk behavior, and encouraging safe behavior.

FPM Safety Committee

A formal safety committee structure is in place to govern FPM safety at USC.

The purpose of the Facilities Planning & Management (FPM) Safety Committee is to assist with the implementation, and management of the university health and safety program. This Committee will continually

support the effort to provide a safe and healthy environment for faculty, staff, students, and visitors. The Committee acts as the voice for the FPM organization as a forum where health and safety issues can be submitted, evaluated, and mitigated. The Committee will continually provide support for the development and implementation of best work practices for employees, safety communications, and applicable resources.

The FPM Safety Committee will provide recommendations to the FPM Chief Safety Officer, FPM leadership and/or other respective university departments for safety improvements based on issues presented at Committee meetings. The Committee will encourage representation and participation of all members to initiate, maintain, and improve safe practices and conditions within their respective work areas and throughout the various locations in which university functions are conducted.

Safety Coordinator or Safety

The Safety Committee will, at minimum, perform the following functions:

- Discuss safety at all levels of the university to create a Safety culture within the organization and apply the same message across the organization to be consistent.

- Encourage feedback from all members of the FPM units and the university community regarding safety related ideas, issues, along with possible solutions.

- Partner with university contractors to verify construction work environments meet university requirements.

- Serve as an advisory group for campus safety issues, providing suggestions and recommendations for resolution.

- Review selected employee injury reports as obtained from Environmental Health & Safety & Finance Human Resources. The committee determines if the causation of the injury was preventable, non-preventable, occupational hazard or other circumstance. They will also indicate the need for corrective action(s) and notify the appropriate Supervisor of the recommended actions by the Chief Safety Officer. Actions may include a workspace inspection, specialized employee training or other appropriate remedy in concurrence with regulatory (e.g., Cal/OSHA, etc.) and university Health and Safety program requirements.

- Review all FPM vehicle accidents for appropriate use of the vehicle, causation, and possible fault. Report findings to the Motor Pool Fleet Supervisor and the FPM Chief Safety Officer for resolution.

- Review injury, illness and near miss reporting to make recommendations for modification within the FPM Injury & Illness Prevention Program. Maintain and update FPM IIPP documents as needed.

- Provide supervisors with resources, communication, and training regarding safety. Receive feedback from all committee members and the FPM organization. Review concerns, develop recommendations and forward information to FPM Leadership.

The FPM Safety Committee meets monthly. Additionally, FPM conducts monthly departmental safety meetings based upon support from the FPM Safety Team.

3. IIPP Information

This IIPP supports the FPM Organization and all of the operating functions under the umbrella of FPM. The following identified persons are the points of contact under this program.

Unit Name	Facilities Management & Planning		
Unit Head/Title	Chris Toomey, VP	Email	ctoomey@usc.edu
IIPP Administrator	Gary Pons, CSO	Email	gpons@usc.edu

Buildings Occupied by This Unit

List all buildings occupied by your unit. For on-campus buildings, the building name is enough, but for off-campus buildings, please write the physical address. Do not include buildings used only for storage.

Building Name & Address (If off campus)	Department/Unit	Building Contact	Phone
CDF- 3434 S. Grand Ave.	UPC CCD and FMS	Gary Pons	213-740-1638
FPM- 3450 S. Vermont	UPC Landscape & Grounds	Pix Verendia	213-740-1006
HSC Grounds Shop 1433 Playground Street	HSC Landscape & Grounds	Sylvester Lucas	323-442-8020
SBA Soto Street Building Annex 2001 N. Soto St	HSC CCD	Carla Barry	213-500-6478
VBB Valley Boulevard Building 4351 Valley Blvd	HSC FMS	Mark Garcia-May Margarita Cardenas	323-442-8005 323-442-0003
UGW University Gateway 3335 S. Figueroa	REAM	David Cook	323-229-2581
UVO Village Lock Shop 3015 S. Hoover St Room 186	Lock Shop	Denise Conine	213-821-5922
ZMT - 3510 S. Vermont	Zones	Flo Langilotti	213-821-5733

Safety Committee

Areas performing high-hazard work or using hazardous materials or equipment may have a Safety Committee providing further support and governance in ensuring the health and safety of their team. See Section 2: Responsibilities – Safety Committees for additional information.

If your area has a safety committee, complete the information below. Contact EH&S if you have any questions.

Committee Name	Meeting Schedule
FPM- Safety Committee	Monthly

Chair	Section/Sub-unit
Pix Verendia*	Landscape & Grounds

Scribe	Section/Sub-unit
Angie Perassolo	Finance Human Resources

Member	Section/Sub-unit
Angela Christopher*	Environmental Health & Safety
Ana Zavaleta*	Finance Human Resources
Bianca Gonzalez*	Facilities Planning & Management Health and Safety
Chris Toomey	Facilities Planning & Management
Eric Johnson	Operations & Maintenance
Eyver Contreras*	HR Business Partner
Flo Ner*	Real Estate & Asset Management
Gary Pons	FPM Chief Safety Officer
Hector Puga*	Real Estate & Asset Management
Joe Back	Capital Construction Development
Jose Manrique	Facilities Planning & Management
Laurie Stone	Real Estate & Asset Management
Mark Mosley*	Engineering & Asset Renewal
Richard Navarro*	HSC Custodial Services
Rod Butterfield*	CCD Director
Shane Daywalt*	Preventative Maintenance
Sylvester Lucas*	HSC Landscape & Grounds
Wendy Kaszycki	Controls, Finance & Administration

*Voting Committee Member

4. Communication

Managers and Supervisors must communicate occupational hazards and appropriate protective measures in a manner readily understood by all employees (CCR Title 8, Section 3203), and all employees can inform their managers about workplace hazards without fear of reprisal.

This gives managers an opportunity to provide leadership, set the standard, and remain directly involved in regular safety interactions. This section provides examples of several effective ways for communicating safety topics.

> See Appendix B for additional communication resources.

New Employee Orientation

At USC Facilities Planning and Management, we always strive to perform our work in a professional, productive, safe, and high-quality manner to continually improve our health and safety performance. Concern for the safety of our employees, faculty, and students is our greatest responsibility, along with safeguarding the general public and our clients' property. Safety is an integral part of how we do business, and we have adopted a comprehensive plan to carry out that philosophy. It is our goal to eliminate unsafe practices and conditions, and to have zero accidents and injuries. As part of the FPM new employee on-boarding process, each person will complete the FPM new employee health and safety orientation training through our Learning Management System (LMS) provider, Trojan Learn.

> Check out the USC Employee Gateway for new hire resources, USC policies, and guidelines.

Safety Meetings

Safety meetings offer an opportunity for employees and managers to discuss health and safety issues in a supportive environment. Bi-annual meetings are recommended for units with low hazard risks (e.g., offices, general spaces) and quarterly meetings for moderate to high-hazard risk areas (e.g., shops, laboratories, maintenance yards).

FPM holds monthly safety meetings.

You can conduct a short training session during a safety meeting, using the Site-Specific or Employee Training Record forms to document attendance. Also, here are some topics for discussion:

- Hazards encountered in the workplace and how to report safety concerns
- Hazard mitigation in progress (e.g., FMS work order, in-house repair)
- Summaries from safety committee meetings (departmental or oversight)

- [EH&S Fact Sheets](#) relevant to your unit
- [Safety Data Sheets (SDS)](#) on specific chemicals/hazardous materials used in daily operations
- Accidents and near misses, their resulting injuries or illnesses, steps to avoid recurrence, etc.
- The sections of the IIPP and everyone's roles and responsibilities
- May have EH&S attend a meeting for specialized training.

Other Communication Methods

Other informal methods of communication help to keep safety an open topic. These are ways you can bring safety into everyday conversation:

- Include safety concerns as a topic in general staff meetings
- Periodically post on eBoards, reminders of health and safety tips
- Post or distribute safety information such as:

    o [EH&S Fact Sheets](#)
    o [General Safety Fact Sheets](#)
    o [Safety Data Sheets](#)
    o [Safety Meeting Agenda Template](#)
    o [Standard Operating Procedures](#)
    o [CCD/FMS eBoards](#)
    o [HR Highlights email](#)

5. Hazard Identification & Assessment

Assessing and identifying hazards proactively enables us to correct the issue and provide training prior to the occurrence of injury, illness, or accident. At USC, we accomplish this by performing a combination of hazard assessments and safety inspections.

Assessments

FPM utilized one or more of several resources analyze and address workplace hazards.

Job Safety Analysis (JSA)

Any job duty with potential risks (anything from a paper cutter to a table saw) requires a Job Safety Analysis to be completed. Similarly, a High Hazard Operations Analysis can be used to aid the development of Standard Operation Procedures.

Workstation Ergonomics

An online ergonomic self-evaluation is available for all employees to complete, and if necessary, employees can request an appointment with the Occupational Therapy Department for an in-person assessment.

Shop Safety Risk Assessment (SSRA)

The Shop Safety Risk Assessment (SSRA) is similar to the LHAT but also includes machinery and physical hazards that a shop may face. All shops should complete an SSRA annually and retain a copy in your records.

FMS performs the following assessment(s): Building Walks and Job Safety Analysis (Basic and High Hazard)

Copies of these records are available at: Zones and FAMIS (Computerized Maintenance Management System)

Inspections

F P M completes workplace safety self-inspections on a regular basis, including supplemental inspections when you become aware of existing or new hazards. In addition, EH&S conducts regular inspections at non-academic shops, research facilities, teaching labs and other technical areas.

Offices

Use the Office Inspection Checklist at least once a year to detect and eliminate hazardous conditions in your office. Maintain a copy of the completed checklist in your IIPP or another centrally accessible location.

Copies of our completed Office Inspection Checklists are available in FAMIS

Non-Academic Shops

Non-academic shops can use the Shop Safety Inspection Checklist to detect and eliminate any existing hazardous conditions. EH&S will use the same form to conduct annual on-site inspections at all shops.

Copies of our completed Shop Safety Inspection Checklists are available in FAMIS.

Non-academic Shop Safety Inspection Checklists shall be completed by the FPM Shop Supervisor/Lead.

Additional Safety Inspections

The FPM Safety Team and/or the Office of EH&S may schedule additional inspections when the following occurs:

- New substances, processes, procedures, or equipment are introduced into the workplace and present new safety or health hazards.
- The manager is informed of previously unrecognized hazards.
- Construction projects lead by the Capital Construction Development (CCD), the Facilities Management Services (FMS), or the Real Estate and Asset Management (REAM) departments.

Additionally, the FPM Safety Team and/or the Office of EH&S also conducts unannounced PPE compliance inspections where hazardous materials (e.g., shops, etc.) are used. The inspections are designed to encourage you to wear PPE as indicated by applicable hazard assessments.

6.   Hazard Reporting

We are all responsible for identifying and reporting workplace hazards. Regular assessment of work areas, tools and equipment help us develop situational awareness and allow us to identify potential hazards before an accident can occur. Additionally, if an incident does occur, knowing how to quickly report the incident and take appropriate action can save lives and minimize damage.

Hazard Reporting

Employees can report hazards to their manager, or directly to the FPM Safety Team using one of the methods below. Employees who report hazardous conditions and/or unsafe work practices in good faith will not be disciplined or subject to retaliation.

Ways to Report a Hazard

Employees may also contact the FPM Customer Resource Center (CRC) 24/7 for afterhours assistance when necessary. The CRC is responsible for processing work requests in response to facilities-related emergencies.

1. **UPC** (213) 740-6833
2. **HSC** (323) 442-8005

Incident Reporting

If there is an incident or emergency such as a fire, hazardous material spill, personal threat, or theft, immediately contact Department of Public Safety (DPS) or the appropriate emergency response agency if you are not within the DPS patrol areas. You should be prepared to provide the following information:

1. **Your Contact Info** (your name and call back number)
2. **Location** (building name and room number)
3. **Explanation** (give as much detail as possible about the emergency)

Please visit the FPM Health & Safety webpage for more information on incident reporting

📞	Call EH&S: 323-442-2200 (you can request to remain anonymous)
🖱️	Complete Online Safety Concern Form
🛡️	Use LiveSafe app on Android and iPhone

Serious Injury or Illness Reporting

For a work-related injury or illness that requires emergency response, follow the procedures on the Emergency Notification Protocol webpage, and post the 1-2-3 Serious Injury Reporting flier in your unit's common areas to familiarize your team with the process. Contact EH&S for printed copies of the poster.

> Employers who fail to report serious occupational injury or illness within 8-hours are subject to a $5,000 penalty.

Managers/supervisors, the FPM Chief Safety Officer, and the FPM HR Partner must immediately report these to EH&S so we may notify Cal/OSHA no longer than eight (8) hours after you learned about the death or serious injury/illness.

In our unit, the 1-2-3 Serious Injury Reporting Flier is posted at the following places:

1. **CDF on various Electronic Boards**
2. **FPM on Electronic Board**
3. **ZMT on Electronic Board**
4. **VBB on Electronic Board**
5. **HSC Landscape Shop**
6. **SBA Soto Street Building Annex**
7. **UVI The USC Village Lock Shop**
8. **UGB- Real Estate & Asset Management office**

Non-Serious Injury or Illness Reporting

Even if an injury or illness did not meet the requirements to report it to Cal/OSHA, the manager, FPM Safety Team, and other USC entities must be involved to ensure the ill/injured person receives the proper care and to determine how the incident could have been prevented. Review the Non-Emergency Injury and Illness Reporting Fact Sheet for the full process.

Near Misses

A near miss is an unplanned event that did not result in an accident, injury, illness, or damage, but had the potential to do so. Near miss incidents are often overlooked since no harm (injury, damage, or loss) resulted from them. However, near misses may be precursors to significant accidents/events that can result in serious injuries/losses. Recognizing and reporting near miss incidents to your department, FPM Safety Team, and EH&S can greatly improve worker safety to enhance your department's safety culture.

You can contact the FPM Safety Team directly to report a near miss or complete the Online Safety Concern Form.

7. Hazard Correction

Once a hazard is identified and reported, the FPM Safety Team, with applicable support form EH&S, will provide consultative support to determine how to correct the hazard to protect staff as soon as feasible. Our internal FPM team may also provide assistance in developing appropriate corrective actions.

Emergency Shutdown

Anyone who identifies a hazard or activity posing an **imminent hazard** must immediately stop the activity, notify their manager, and report it to DPS.

FPM Safety or EH&S has the authority to stop any such university activity. If the hazard cannot be immediately corrected without endangering employees or property, then the manager, FPM Safety, or EH&S will require all employees to evacuate from the area (with the exception of those that are knowledgeable, qualified, necessary, and equipped with proper safeguards to correct the condition). In such an event, FPM Safety, EH&S, or the manager will immediately notify the appropriate administrator.

> **Imminent hazard** is the likelihood of serious injury or death if not discontinued immediately.

Immediate Corrections

The person that identifies the hazard should take the following actions as appropriate:

- Stop observed unsafe work practices immediately.
- Tag unsafe equipment with proper signage and take out of service if safe to do so.
- Deny access to areas where a chemical spill or other safety hazards (e.g., electrical, fall, etc.) exist.
- Notify manager and the FPM Chief Safety Officer immediately.
- Create Work Orders as needed.

Manager/Supervisor Responsibilities

If the hazard is something that the manager/supervisor can correct, it should be documented properly and corrected right away. If not, contact the FPM Safety Team for support.

Regardless of who has been contacted to develop a targeted corrective action plan, the manager should use the following techniques to prevent unsafe practices:

- Provide re-training or take corrective action if appropriate
- Reinforce and explain the necessity for PPE (e.g., respirators, gloves) and ensure availability
- Perform re-inspection of hazard
- Reinforce processes, guidelines and policies

Any manager/supervisor who becomes aware of a danger to the health or safety of an individual must promptly report the danger to the FPM Safety Team (see Section 6: Hazard Reporting) and to anyone who may be affected.

8. Training

Training is one of the most important elements of a health and safety program. Awareness and proper training regarding workplace hazards are the best way to prevent injuries, illnesses, and accidents.

Managers/supervisors, working concurrently with the FPM Safety Team, are responsible for verifying that their staff meet all training needs per Cal/OSHA requirements and USC guidelines, policies, and procedures.

Identify Training Needs

Use the following tools to determine what hazard or job-specific training may be needed:

- FPM Health and Safety Training Matrix Job descriptions
- Hazard assessments
- Job Safety Analysis (JSA)
- Cal/OSHA Training Requirements

Provide Training

Training must be given at various stages in an employee's career, including:

- New Employee Health and Safety Program Orientation (Upon hire)
- Continuous H&S safety training consistent with the FPM Health and Safety Training Matrix requirements
- When new hazards are introduced to existing duties
- When duties change
- When recertification is due
- When new or previously unrecognized hazards are identified
- As needed to reinforce past training topics or when near-misses occur
- For supervisors to familiarize themselves with safety and health hazards to which employees under their immediate direction and control may be exposed

Training Topics

Major topics include, but are not limited to:

- IIPP (when newly implemented or revised significantly)
- General Safety (i.e., fire safety, emergency preparedness)
- Hazard-Specific Training
- Hazard Communication
- Asbestos Awareness Training

Training Resources

FPM has implemented a computer-based Learning Management System (LMS) to provide and track employee training. Training progress is recorded by the LMS, which can be queried by managers and supervisors to facilitate effective tracking for their respective offices. The FPM health and safety training curricula is fully implemented on the LMS. The LMS allows employees some flexibility with respect to completing their H&S training within an established schedule.

Training requirements are summarized in **FPM Health and Safety Training Matrix (Appendix B)**. Training may include live presentations by qualified instructors, LMS computer-based training, or self-paced study. Some specialized training (asbestos training, initial HAZWOPER, etc.) may be conducted by third party organizations.

Refresher training may be required for some functions, for example working at a hazardous waste site (i.e., HAZWOPER, etc.). Training is also provided for new job tasks or when new hazards are introduced into a worker's environment.

Most training requires some type of testing or verification that employees understand the training. LMS training modules include examinations that students must pass to receive credit. Feedback from trained employees, in the form of evaluations, is used to improve course content and provide opportunities for employees to participate in the development and review of training sessions.

12-Months of Safety Talks

FPM Supervisors are required to provide employees with safety talks each month using the 12-months of safety materials. These materials are provided to Supervisors each month by the FPM Safety Team and should be distributed to all employees. Monthly safety materials are also shared on the electronic communication boards throughout FPM.

Criteria for Instructors

Instructors (whether internal or external) must have the academic credentials and instructional experience necessary for teaching the subject. If there is any question whether instructors are qualified to provide the necessary training, the corporate H&S team will be consulted before they can instruct USC personnel.

Training Records

Training records are kept for each employee who receives training, including:
- Employee's name
- Name and description of training topic
- Date and duration of training session
- Delivery method or instructor's name, with job title/organization if an outside vendor.
- Results of verification tests
- A copy and the expiration date of certificates or licenses obtained during training

Training records are maintained in the LMS where employees can view transcripts of their training and managers/supervisors can track the progress of employees. Each manager/supervisor has "view only" access to the LMS training records and will review it monthly for accuracy. Any inaccuracies will be communicated to the FPM Chief Safety Officer within the LMS for the duration of each applicable employee's employment plus 7-10 years.

- Many other resources are available to our FPM team in meeting training requirements: Trojan Learn
- EH&S Fact Sheets
- Safety Data Sheets
- FPM Monthly Safety Message

Training Documentation

Although health and safety training may be provided online, in a classroom, or a meeting setting, they should always be provided at no cost during the employee's normal working hours and shall be documented on a form that includes:

- Employee Name, ID Number, and Signature
- Department
- Date
- Instructor Name
- Subject Outline

9. Recordkeeping

Cal/OSHA regulations require that records for occupational injuries and illnesses, medical surveillance, exposure monitoring, inspections, training, and other safety activities be maintained for specific periods of time. Records must be kept in employee personnel files or general department files following University guidelines and must be produced when requested by Cal/OSHA Compliance Officers. In addition, personnel from the FPM Safety Team and/or EH&S may review these records during routine inspections.

Good recordkeeping is essential for all FPM groups, including the FPM Safety Committee. Various records, (e.g training records) shall be kept in a centralized location and housed with Human Resources to ensure they are readily available for review.

Recordkeeping Timelines

What	Where	How Long
Safety inspection forms	On file by department	5 years
Hazard identification forms	On file by department	5 years
Incident investigations	On file by department	5 years
Safety meeting agendas	On file by department	5 years
Employee training records	On file by department	Length of employment
Employee exposure records	On file by department	30 years (or duration of employment if greater than 30 years)
Employee medical records*	On file by department	30 years (or duration of employment if greater than 30 years)

Access to employee medical records will be limited in accordance with University policies, state and federal guidelines.

In our unit, the following people know where these records are kept:

Name	Contact Info
HR – Manager's Report of Incident, Training	213-740-2374
FPM Safety Committee	Committee Chair or Scribe

A. Forms & Templates

Samples of all forms and templates referenced in the IIPP are available here. Go to tiny.cc/usc-iipp or click on the links below to download copies for use.

Assessment

Job Safety Analysis Form	tiny.cc/usc-jsa
Office Safety Inspection Form	tiny.cc/inspections
Online Ergonomic Self-Evaluation	srm.usc.edu/rmcsapps/ergoselfevalsys
Vehicle Inspection Checklist	tiny.cc/usc-vehicle-inspect-check
Slip/Trip/Fall Checklist	tiny.cc/slips-trips-falls
High Hazard Operations Analysis Form	tiny.cc/usc-hh-ops-analysis-form
Standard Operating Procedures (SOP) Template	tiny.cc/usc-sop-template
PPE Inspection Checklist	tiny.cc/usc-ppe-inspect-checklist
Shop Safety Inspection Checklist	tiny.cc/usc-shop-inspect-check
Shop Safety Risk Assessment (SSRA)	tiny.cc/usc-ssra-form

Reporting

Workers' Compensation Form	tiny.cc/usc-wc-claim-form
Manager's Incident Report	tiny.cc/usc-mgr-report-incident
Volunteer Injury or Illness Report	tiny.cc/Volunteerreport
Report a Safety Concern Online Form	tiny.cc/usc-report-safety-concern
Incident Investigation Form	tiny.cc/inspections

Others

FPM Health and Safety Training Matrix	tiny.cc/training-matrix
Safety Meeting Agenda Template	tiny.cc/usc-safety-mtg-mts
Safety Committee Charter Template	tiny.cc/usc-saf-cmte-charter-tml
Site-Specific Training Record Form	tiny.cc/usc-site-training-record
Employee Training Record	tiny.cc/usc-ee-training-record

B. Training & Communication Resources

Links to all the training and communication resources referenced in the IIPP are available here. Go to tiny.cc/usc-iipp or click on the links below to view the sites or download copies for use.

Job-Specific

FPM H&S Training Schedule (LMS)	tiny.cc/usc-ehs-training
EH&S Fact Sheets	tiny.cc/usc-ehs-fact-sheets
Safe Lifting/Back Injury Prevention	tiny.cc/lifting-back
Cal/OSHA Training Requirements	www.dir.ca.gov/dosh/dosh_publications/trainingreq.htm
Hazard Communication and Awareness	tiny.cc/usc-hazcom
National Safety Council Safety Training	tiny.cc/usc-nsc-training
State Fund Safety Resource Center	tiny.cc/usc-state-fund-training

General Safety

Trojan Learn	trojanlearn.usc.edu
Fire Safety	tiny.cc/usc-fire-safety
Evacuation Procedures	tiny.cc/usc-evac-procedures
Emergency Planning	tiny.cc/usc-emergency-prep
Disaster Preparedness	tiny.cc/usc-bcp
Safety Fact Sheets	tiny.cc/usc-safety-fact-sheets
Injury & Emergency Reporting	tiny.cc/injury-reporting

References

FPM Guide to Services	tiny.cc/guide-to-services
USC PPE Program	tiny.cc/usc-ppe-standard
UPC Emergency Plan	tiny.cc/bcp
HSC Emergency Plan	tiny.cc/bcp
USC Business Continuity	tiny.cc/usc-bcp- FPM BCP