

**VA NORTHEAST OHIO HEALTHCARE SYSTEM  
Louis Stokes Cleveland DVAMC  
Medical Research Service  
Subcommittee on Research Safety Policy**

**Effective Date: JULY 20, 2022**

**Policy Title: EMPLOYEE HAZARDS TRAINING BY SUPERVISOR**

**Policy Number: SRS--010**

**Policy Version: .10**

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1. **PURPOSE:** To document employee training in laboratory-specific hazards and the safety mechanisms in place.
2. **POLICY:** Supervisors will train each employee upon initial assignment and annually thereafter. Additional training will be presented every time a new chemical or piece of equipment is added to an employee's duties or when their duties change. Supervisors will maintain documentation of this training.
3. **DEFINITIONS:**
  - a. RSC/CHO - Research Safety Coordinator/ Chemical Hygiene Officer
  - b. Hazardous Chemical - chemicals that are listed with air contaminant upper limits in table Z-1 in OSHA regulation 1910.1000 "Air Contaminants", chemicals listed as toxic and hazardous substances in OSHA regulations 1910.1001-1050.
  - c. Extremely Hazardous Chemicals - chemicals listed in Ohio Revised Code Section 3750.02(B) (1) (a) (Ohio Administration Code 3750-20-30).
  - d. PPE - Personal Protective Equipment
  - e. MAXCOM Notebook - a notebook in each investigator's laboratory which contains a Hazardous Communication (HAZCOM) Plan, Chemical List, Safe Use Guides, Definitions, and Pictograms.
4. **RESPONSIBILITY:**
  - a. Associate Chief of Staff for Research (ACOS/Research):
    - (1) Informs each new investigator of their responsibility to perform supervisor training.
    - (2) Ensures that each investigator is knowledgeable in all areas for which they will be responsible for training their employees.
    - (3) In the event of supervisor noncompliance, identifies and takes corrective action while ensuring that employees receive appropriate training.
  - b. RSC/CHO:
    - (1) Assists supervisor in compiling training requirements.
    - (2) Assists supervisor in the documentation of training.

- (3) Examines laboratory training documentation at least annually to ensure compliance.
- (4) Reports potential non-compliance to the Subcommittee on Research Safety and Security.

c. Investigator:

- (1) Trains each employee in all hazards that they will likely face in their workplace (resulting from duties and/or location) as indicated in section 5.
- (2) Ensures that each employee attends all required training.
- (3) Provides additional training when an employee's environment or duties change. An Investigator may also require additional training due to procedural changes or on an "as needed" basis.
- (4) Maintains documentation of training.
- (5) If desired, appoints a Laboratory Supervisor to assume investigator's responsibilities for training other laboratory personnel. Ensures that the Laboratory Supervisor is knowledgeable in all areas for which they will be responsible for training employees and reviews this policy to ensure compliance.

d. Employee:

- (1) Attends required training.
- (2) Asks questions until they understand all hazards that they will likely face.
- (3) Avoids unnecessary exposure to hazardous situations.
- (4) Contacts RSC/CHO with any questions regarding training requirements or safety procedures.

5. PROCEDURE:

a. Upon an employee's initial assignment, the Principal Investigator or designated Laboratory Supervisor will provide training until the employee is proficient in applicable laboratory procedures to ensure chemical safety, biosafety, radiation, and physical safety measures are properly adhered to. This involves all hazards that they will face when performing their duties, and how to best minimize those hazards. Training will cover all health and physical hazards as listed on the Employee Confirmation of Laboratory Safety Training by Supervisor checklist.

- (1) Identify the employee's supervisor.
- (2) Identify the location of the laboratory MAXCOM Notebook.
- (3) Identify two fire escape routes from the laboratory.
- (4) Indicate the location of the nearest emergency equipment, i.e., the nearest fire extinguisher, fire alarm pull station, telephone for emergency use, eyewash station and emergency shower.

- (5) Identify the Biosafety level of the lab and review the associated required safety procedures associated with that level.
- (6) Review every procedure that they will be required to perform.
- (7) Review the list of hazardous/extremely hazardous chemicals that appear in the MAXCOM Notebook.
- (8) For each chemical the employee will work with, identify:
  - (a) The location of Safety Data Sheets (SDS), which are available in MAXCOM, located on the Louis Stokes Cleveland DVAMC home page, right column, MAXCOM tab.
  - (b) Physical characteristics.
  - (c) Physical hazards.
  - (d) Health hazards - route of entry, target organs.
  - (e) Proper handling/special precautions/steps to reduce exposure levels.
  - (f) Type and location of PPE required during use.
  - (g) Methods and observations used to detect the release of a chemical.
  - (h) Permissible exposure limit.
  - (i) Signs and symptoms of exposure.
  - (j) Monitoring of exposure.
  - (k) Proper storage.
  - (l) Proper disposal.
  - (m) Proper spill cleanup procedures.
- (9) For every piece of equipment, the employee will use, identify:
  - (a) Location of operating instructions.
  - (b) The hazards associated with the machine.
  - (c) Proper operating procedures – including the use of PPE.
- (10) For every protocol:
  - (a) Review all the steps in every protocol the employee will be performing.
  - (b) Answer fully all questions asked by the employee.
- (11) For every type of PPE:
  - (a) How it is to be worn.

- (b) What its limitations are.
  - (c) Its proper care and maintenance.
  - (d) Its useful life, e.g., until no longer functioning as designed.
  - (e) How to dispose of it.
- (12) Review personnel accident procedures.

b. Employee training or retraining is required when any of the following situations occur. Retraining must cover all parts of 5.a. - PROCEDURE that correspond to the change that has been made. Situations that require retraining:

- (1) A new chemical is introduced.
- (2) A new piece of equipment is introduced.
- (3) A new protocol is introduced.
- (4) A protocol is changed.
  - (a) No protocol may be changed verbally. Changes in protocol must be written.
  - (b) A change in one part of a protocol requires a complete review of the entire protocol.
- (5) The MAXCOM Notebook is moved to a new location.

c. Every instance of training and retraining must be documented. The Laboratory Biological Risk Assessment is used to document an employee's confirmation of supervisor training; RSF #142 is used to document employee initial training and all instances of retraining. All documentation must be maintained in the Laboratory MAXCOM Notebook. The documentation for a given protocol must be maintained until documentation for the revised version of the protocol is complete. All outdated documentation should be kept by the Principal Investigator or Laboratory Supervisor.

6. RESCISSIONS: Medical Research Safety Policy Employee Hazards Training by Supervisor. The rescission date of this policy is July 19, 2027.

7. FOLLOW UP: RSC/CHO

**EMPLOYEE CONFIRMATION OF LABORATORY SAFETY TRAINING BY SUPERVISOR**

Employee Name \_\_\_\_\_ Supervisor \_\_\_\_\_

Date	Supervisor Initials	Employee Initials	Subject
			Attend New Employee Safety Orientation or complete an on-line training provided by the Research Safety Coordinator.
			Identify the employee's supervisor
			Location of the MAXCOM Safety Notebook, which contains: <ol style="list-style-type: none"> <li>1. Chemical Hygiene Plan</li> <li>2. Hazard Communication Program</li> <li>3. Hazardous Agents Control Program</li> <li>4. Printed Chemical Inventory</li> <li>5. Laboratory Risk Assessment - Identify hazardous chemicals actively being used in the laboratory and sign-off to acknowledge understanding</li> <li>6. Standard Operating Procedures (if applicable) to specific laboratory.</li> </ol>
			Location of Safety Data Sheets (SDS): MAXCOM (which is located on the Cleveland VA Intranet Home Page: <a href="https://vaww.cleveland.va.gov/">https://vaww.cleveland.va.gov/</a> ). <ol style="list-style-type: none"> <li>1. Physical characteristics.</li> <li>2. Physical hazards.</li> <li>3. Health hazards - route of entry, target organs.</li> <li>4. Proper handling/special precautions/steps to reduce exposure levels.</li> <li>5. Type and location of PPE required during use.</li> <li>6. Methods and observations used to detect the release of a chemical.</li> <li>7. Permissible exposure limit.</li> <li>8. Signs and symptoms of exposure.</li> <li>9. Monitoring of exposure.</li> <li>10. Proper storage.</li> <li>11. Proper disposal.</li> <li>12. Proper spill cleanup procedures.</li> </ol>
			Location of Subcommittee on Research Safety and Security Policies (which are located on the Cleveland VA Research Website: <a href="https://www.clevelandvaresearch.org/srs-policies">https://www.clevelandvaresearch.org/srs-policies</a> )
			Identify the study and associated Research Protocol Safety Survey that you are assigned to and review the study and all associated hazards.
			Identify Biosafety Level of laboratory and review required lab practices to prevent exposure.
			Identify two emergency routes of exit from laboratory.
			Identify the nearest location of an Emergency Eyewash and Shower Station.
			Identify the nearest fire extinguisher.
			Identify the nearest fire alarm pull station.
			Identify location of nearest spill kits (chemical, infectious material, and mercury), as applicable as well as procedures to follow upon a spill.
			Identify emergency phone number, extension 2222.


