

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

Effective Date: APRIL 14, 2021

SOP Title: MEDICAL RESEARCH SERVICE SAFETY PROGRAM

SOP Number: SRS--001

SOP Version: .13

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1. **PURPOSE:** To establish a safety program within the Medical Research Service that provides for the protection of research personnel and compliance with relevant safety requirements.
2. **POLICY:** Medical Research Service will strive to provide a safe environment for employees, patients, and visitors by requiring and supporting the establishment and maintenance of an effective service safety policy.
3. **DEFINITIONS:**
 - a. **Employees** - This includes all VA employees (full-time, part-time, and without compensation) regardless of work site and non-VA employees who work on VA premises.
 - b. **SDS** - Safety Data Sheet. Informational sheet prepared by the manufacturer of a chemical which states physical and chemical properties of the chemical as well as handling, storage, and disposal procedures.
 - c. **NRC** – Nuclear Regulatory Commission
 - d. **RSC/CHO** – Research Safety Coordinator/Chemical Hygiene Officer
 - e. **RSO** – Radiation Safety Officer
 - f. **WOC** (Without Compensation) employee – An employee who is paid by any other source other than the VA, i.e. Case Western Reserve University, University Hospitals, etc or has a volunteer status.
 - g. **TJC** – The Joint Commission: The Joint Commission is a United States-based nonprofit tax-exempt 501 organization that accredits more than 20,000 health care organizations and programs in the United States.
4. **RESPONSIBILITIES:**
 - a. **ASSOCIATE CHIEF OF STAFF/RESEARCH (ACOS/RESEARCH):**
 - (1) The approving official for all policies and procedures relative to safety within Medical Research Service.
 - (2) Appoints the RSC/CHO.

(3) Establishes and maintains an active Medical Research Service Subcommittee on Research Safety. See Medical Center Policy 151-007 "Subcommittee on Research Safety" for information related to the SRS.

(4) Ensures that employees receive orientation and required safety-related training presented by the Facility Safety Office, RSC/CHO, RSO, their immediate supervisor, and other appropriate individuals.

(5) Reviews performance of safety responsibilities by supervisors.

(6) Provides appropriate disciplinary action when it is evident that safety and health standards are violated.

(7) Reports accidents, safety activities, and fire prevention activities that occur within the service at staff meetings.

b. INVESTIGATOR/SUPERVISOR:

(1) Informs the RSC/CHO and RSO (if appropriate) whenever a new employee starts work in the laboratory.

(2) Provides new employees with training on safe working practices, policies, and procedures appropriate for their laboratory and maintains documentation of this training.

(3) Ensures that new VA employees attend VA employee orientation; and all new employees attend Research Safety orientation and Radiation Safety orientation (if appropriate).

(4) Ensures that all employees complete required Talent Management System (VA web-based training, which includes safety-related coursework), Research Service Safety and Radiation Safety (if applicable) refresher training.

(5) Actively promotes and supports safety and fire prevention programs conducted at the facility.

(6) Ensures that employee work areas are free of unnecessary clutter.

(7) Ensures that any employee injured on the job receives first aid and/or emergency care.

(8) Ensures that any accident occurring within his/her laboratory or work area is investigated and a Report of Accident is submitted through the Employee Health Services ASISTS (Automated Safety Incident Software Tracking System).

(9) Provides light or alternative duty for injured employees, when possible.

(10) Follows up on the status of an injured employee and provides notification to Facility Safety Office.

(11) After an accident, takes corrective action to prevent a recurrence.

(12) Provides appropriate disciplinary action when it is evident that safety and health standards are violated.

(13) Identifies and corrects physical hazards and unsafe practices in his/her work area through periodic inspections.

(14) Reports unsafe conditions and practices to the RSC/CHO and initiates corrective action.

(15) Performs a Hazard Assessment of all areas and procedures in his/her laboratory and trains his/her employees in the hazards they will face and the personal protective equipment which must be employed to prevent injury and maintains documentation of this training.

(16) Provides personal protective equipment as needed and ensures that employees are trained in its use/maintenance and ensures that employees use personal protective equipment when required.

c. EMPLOYEE:

(1) Knows and complies with regulations and procedures set forth by the hospital, TJC, NRC, Medical Research Service, and his/her laboratory supervisor.

(2) Attends initial orientation provided by Personnel Service (VA employees only), the RSC/CHO, and the RSO (if applicable).

(3) Completes annual safety training required by the Facility Safety Office, the RSC/CHO (Medical Research Service), and the RSO (Office of the Director).

(4) Uses and maintains personal protective equipment when required.

(5) Keeps work areas free of unnecessary clutter.

(6) Promptly reports unsafe or unhealthy conditions to his/her supervisor.

(7) Promptly reports accidents to his/her supervisor.

(8) Participates in safety promotions presented by the Facility Safety Office and the RSC/CHO as directed by his/her supervisor.

(9) Knows the emergency procedures for his/her immediate work area. This includes knowing the location of safety devices such as fire extinguishers, fire alarm pull-stations, fire doors, emergency eyewash stations and emergency showers. Knows and follows proper evacuation procedures.

d. RESEARCH SAFETY COORDINATOR/CHEMICAL HYGIENE OFFICER:

(1) Participates in training for Safety Coordinators.

(2) Tracks research safety training.

(3) Documents new employee attendance at a New Employee Safety Orientation presented by the RSC/CHO. Topics to be covered include: eating, drinking and hand washing requirements, hazard communication laws, the Chemical Hygiene Plan, Material Safety Data Sheets, personal protective equipment requirements, lockout/tagout, spill cleanup, hazardous waste disposal, infectious waste handling, sharps hazards, fire safety, and Emergency Disaster Procedures.

(4) Develops and revises training materials covering all areas of in-service training, especially those covering Safety Management, Fire Safety Management, Utility Management, Equipment Management, and Emergency Disaster Procedures.

(5) Maintains all training documentation.

(6) Follows the regulations of TJC, OSHA, and the NRC. The RSC acts on recommendations from the Environment of Care (EOC) Committee, Radiation Safety Committee, the Radiation Safety Officer, and the Facility Safety Office.

(7) Actively promotes and supports safety and fire prevention and security programs conducted at the facility.

(8) Ensures that any accident occurring within Research Service is investigated immediately by the appropriate supervisory personnel, and that the necessary forms are completed and forwarded correctly.

(9) Reports operational problems and/or violations noted by a Principal Investigator to the SRS for review.

(10) Recommends appropriate disciplinary action to the ACOS/Research when it is evident that safety and health standards are violated.

(11) Evaluates and revises the Medical Research Service Safety Program on an annual basis.

(12) Writes and submits an annual review to the Research and Development Committee regarding the Safety and Security of Medical Research Service.

(13) Coordinates semi-annual Medical Research Service chemical inventory updates, which is reviewed by the RSC/CHO, submitted to the SRS, and forwarded to the Facility Safety Office.

(14) Submits Safety Data Sheets (SDS) and New Chemical Request Forms for Medical Research Service to the Facility Safety Office. When approved, new chemicals and the associated SDS are downloaded into a web-based workplace chemical safety program (MAXCOM), which fully complies with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard [29CFR 1910.1200].

(15) Ensures that the safe use guides and Safety Data Sheets (SDS) for all hazardous and extremely hazardous chemicals are maintained in MaxCom and available to personnel.

(16) Coordinates weekly inspections of emergency eyewash and shower stations.

(17) Conducts Research Safety Subcommittee meetings. This includes preparing the agendas and minutes, maintaining documentation, and forwarding copies of the SRS-approved minutes to the Research and Development Committee for review.

(18) Coordinates a semi-annual inspection of the Medical Research Service and submits work orders for deficiencies noted. Reports individual laboratory deficiencies to the investigator by memorandum within ten working days of the date the violation was first reported.

e. MEDICAL RESEARCH SERVICE SUBCOMMITTEE ON RESEARCH SAFETY (SRS):

(1) Annually reviews/updates/approves the Medical Research Service Safety Training Manual, which includes the Chemical Hygiene Plan and Hazardous Agents Control Program. After being approved by the SRS, it is submitted to the Research and Development Committee.

(2) Ensures proper health surveillance and exposure monitoring of personnel.

(3) Reviews the transfer of all hazardous chemicals and reports approved transfers to the Associate Chief of Staff/Research.

(4) Reviews and approves SRS Policies.

(5) Reviews accident reports and employee complaints and suggestions. Makes recommendations to the Environment of Care Committee through the Facility Safety Office.

(6) Reviews semi-annual Medical Research Service laboratory inspections.

(7) Ensures that all deficiencies cited during safety inspections are properly abated.

(8) Operational problems and or violations are reported to/handled by the RSC within thirty days.

(9) See Medical Center Policy 151-007 "Subcommittee on Research Safety" for information related to the SRS.

(10) Reviews Research Protocol Safety Surveys (RPSS) and the associated Local Appendix for each protocol submitted through the Research and Development Committee.

f. CHAIRPERSON, SUBCOMMITTEE ON RESEARCH SAFETY:

(1) Oversees all Subcommittee on Research Safety activities.

(2) Works closely with the Research Safety Coordinator.

REFERENCES: VHA Handbook 1200.08.

5. RESCISSION: Medical Research Service Policy 001 Medical Research Service Safety Program dated April 14, 2021. The rescission date of this Subcommittee on Research Safety Policy is April 13, 2022.

7. FOLLOW-UP: RSC/CHO

