

Research Occupational Health and Safety Program Policy

PURPOSE:

The purpose of the University of Georgia (UGA) Research Occupational Health and Safety Program (R-OHSP) is to support research discoveries and instructional endeavors, through participant health and safety protection. This purpose is accomplished through timely risk assessment and provision of appropriate, high-quality health services.

AUTHORITY:

The R-OHSP is administered by the UGA Office of Research Integrity and Safety, with oversight by the Support Services Director. The National Research Council's *Occupational Health and Safety in the Care and Use of Research Animals*⁴ and the Center for Disease Control's (CDC) *Biosafety in Microbiological and Biomedical Laboratories*¹ are used to provide guidance and benchmarks for the UGA R-OHSP. The CDC's *2008 Human Rabies Prevention – Recommendations of the Advisory Committee on Immunization Practices*² is also used as a best-practice standard.

SCOPE:

The R-OHSP is open for enrollment to:

- Anyone on an Institutional Animal Care and Use Committee (IACUC) – approved Animal Use Protocol (AUP)
- Anyone on an Institutional Biosafety Committee (IBC) – approved protocol
- All UGA employees that have potential contact with human bloodborne pathogens, as a direct result of their research and/or instruction activity
- All animal husbandry employees that work for either PHS Assured units or non-PHS Assured units at UGA (e.g. Animal Health Research Center (AHRC), University Research Animal Resources (URAR), Nonhuman Primate Core (NPC), agricultural facilities)
- All persons who enter the NPC but who will have no direct contact with animals
- All members of UGA's IACUC or IBC
- All employees of the Office of Animal Care and Use, Office of Biosafety, Office of Human Subjects, Office of Research Safety and Office of Support Services who have potential contact with animals used in research and/or instruction, biohazards and/or hazardous chemicals
- Anyone entering a UGA research animal facility and having no direct animal contact (open to non-contact enrollment only)

Most recommended health services are provided to UGA participants free-of charge. Certain nonstandard, protocol specific services may be charged to the researchers' UGA department. Non-UGA

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participants, who are listed on an AUP or IBC Protocol can participate in the R-OHSP on a fee-for-service basis, if they do not have appropriate coverage at their home institution or with their private medical provider. Their charges will be billed to the sponsoring UGA department.

ENROLLMENT:

Participants are not enrolled in the R-OHSP until ALL recommended services have been completed and the laboratory records have been received or recommended services have been declined, as applicable.

Individuals who qualify for enrollment are identified in one of the following ways:

1. They are listed on an AUP.
2. They indicate on their Profiler, in the Professional Education Portal (PEP) that they intend to work with research animals.
3. They indicate on their Profiler, in PEP, that they intend to work with biohazards and/or human blood, body fluids, tissues or cells.
4. Their participation is requested by the Office of Biosafety, because they could potentially come into contact with biohazards (whether or not there will be a related IBC Protocol).
5. Their participation is requested by an authoritative source (e.g. Principal Investigator, Office of Human Subjects, Office of Biosafety) because they will have contact with human or nonhuman primate bloodborne pathogens, including substances with unknown infectious status (other potentially infectious materials (OPIM))
6. Their participation is requested by URAR administration because they are an employee, intern or volunteer, who will have contact with research animals.
7. Their participation is requested by AHRC administration because they are an employee or intern, who will have contact with research animals and/or biohazards.
8. Their participation is requested by the NPC Principal Investigator or their designee because they are an employee, intern or volunteer, who will work with research animals in the NPC.
9. Their participation is requested by the Office of Animal Care and Use because they have been identified as a UGA employee, intern or volunteer who has contact with animals that are used in UGA research or instruction at a UGA satellite animal facility.
10. Their participation is requested by the Office of Animal Care and Use, the Office of Biosafety, the Office of Human Subjects, or the Office of Support Services because they are an employee or intern who has potential contact with animals used in research and/or instruction or biohazards, including contact with bloodborne pathogens or OPIM.
11. Their participation is requested by the Office of Research Safety because they are an employee or intern who has potential contact with hazardous chemicals.
12. Their participation is requested by the NPC Principal Investigator or their designee because they will be entering the NPC, but will have no direct animal contact (e.g. vendor).
13. Their participation is requested by the Office of Animal Care, the Office of Biosafety or the Office of Research Safety because they serve on a compliance committee, where their participation may expose them to potential contact with animals used in research and/or instruction, biohazards and/or hazardous chemicals.

14. Their participation is requested by an animal facility supervisor or administrative official in URAR or the Office of Animal Care and Use because they will be entering, with escort, an animal facility as a visitor and will have no direct animal contact.

All individuals who wish to enroll in the R-OHSP, with the exception of 14 above, must have an active UGA MyID and password. For non-UGA personnel, the requesting department can assist with the creation of a UGA affiliate account, if necessary.

Individuals identified in 1-10 above, are assigned *Research Occupational Health Program Information* in PEP and they receive an automated notification of this assignment from the system. The individual should access this document and then read about the R-OHSP. They follow the embedded link to access the *Research Occupational Health Questionnaire*. They complete the questionnaire with information about their work and their personal health status. This questionnaire is then risk assessed by the R-OHSP Nurse, who communicates with the participant any recommendations on health services.

Individuals identified in 11 above, are assigned *Hazardous Materials Occupational Health Information* in PEP and they receive an automated notification of this assignment from the system. The individual should access this document and then read about working with hazardous materials. They follow the embedded link to access the *Hazardous Materials Occupational Health Questionnaire*. They complete the questionnaire with information about their work and their personal health status. This questionnaire is then risk assessed by the R-OHSP Nurse, who communicates with the participant any recommendations on health services.

Individuals identified in 12 above, are assigned *Primate Non-Contact Occupational Health Enrollment Information* in PEP and they receive an automated notification of this assignment from the system. The individual should access this document and then read about risks and expectation for entering the NPC. They follow the embedded link to access the *Primate Non-Contact Occupational Health Questionnaire*. They complete the questionnaire with information about their personal health status. This questionnaire is then risk assessed by the R-OHSP Nurse, who communicates with the participant any recommendations on health services.

Individuals identified in 13 above, are assigned the relevant type of enrollment information. They access this information and then subsequently access the embedded link to the relevant questionnaire. This questionnaire is then risk assessed by the R-OHSP Nurse, who communicates with the participant any recommendations on health services.

Individuals identified in 14 above, are provided a link to *UGA Medical Surveillance Information Sheet for Non-Contact Animal Exposure*, in Qualtrics. The individual should access this document and then read about the risk associated with entry into an animal facility. They must then enter their contact information and agree to accept the associated risks. This form will be kept on file by the R-OHSP.

Most individuals have the right to decline participation in the R-OHSP and they must do so on the *Research Occupational Health Questionnaire*. Participation in the program is strongly encouraged. Submission of this declined questionnaire is required in order to confirm that the individual was offered participation in the program. By declining occupational health coverage, individuals are absolving the institution from any damages that are the result of preventable occupational health exposures.

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Individuals have the right to change their mind and enroll in the program at any time, so long as they are still eligible for enrollment. The follow groups cannot work unless they are enrolled in the R-OHSP:

- URAR personnel
- AHRC Bioresources personnel
- Researchers working with A/BSL-3 agents
- Personnel working with macaque primates
- Researchers working with rabies, rabies infected animals, and specific wild species defined by the CDC as high-risk
- Personnel working with certain high-risk biohazards, as determined the IBC
- Personnel for whom their PI requires enrollment

Participants have the right to decline one or more recommended services. To do so, they must acknowledge a *Research Occupational Health Services Declination* form in PEP. If they are declining Hepatitis B protection, they must acknowledge a *Hepatitis B Protection Declination* form in PEP. By declining occupational health services, individuals are absolving the institution from any damages that were preventable through those services. Individuals have the right to seek previously declined services at any time, so long as they are still recommended based upon their risk assessment.

Participants are not enrolled in the R-OHSP until ALL recommended services have been completed and the laboratory records have been received or recommended services have been declined, as applicable.

Participants must submit an updated *Research Occupational Health Questionnaire* (or other applicable questionnaire) at least every 3 years, unless they have declined occupational health coverage. They should do so more often if they have any significant changes in the nature of their work or their personal health status. Failure to submit within three years will automatically unenroll the participant from the R-OHSP.

SERVICES:

Most occupational health services, including immunization, titers, testing and respiratory services, are provided through the R-OHSP Clinic, under the direct oversight of the R-OHSP Nurse. The R-OHSP Nurse operates under the authority of a contracted Occupational Health Physician. All services are administered via standing order from the physician. Any complications or unusual results are referred to the Occupational Health Physician at Piedmont Occupational Health Medicine, Piedmont Medical Center Emergency Room or the Athens Clarke County Health Department.

TRAINING:

Certain training requirements are mandated, as relevant, by the R-OSHP for enrollment. These include:

1. USG Bloodborne Pathogens Training for anyone working with human blood, body fluids, tissues or cells (including purchased cells that are not pre-screened for hepatitis B and human immunodeficiency virus)
2. Respiratory Protection Training for anyone who is mandated to use a tight fitting respirator.
3. PAPR Training for anyone who uses a powered air purifying respirator.

Trainings 1 and 2 can be found on PEP. Training 3 is administered by the Office of Biosafety upon request. These trainings do not represent all of required compliance trainings. They are the only

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three that directly impact R-OHSP enrollment.

The IACUC requires enrollment in the R-OHSP before any animal contact. Additionally, the IACUC requires that anyone who works with animals have relevant training in biosafety, zoonotic diseases, animal allergy risks, and effective use of personal protective equipment.^{3,5} They must also undergo training in handling and husbandry procedures for the species with which they work.^{3,5} Failure to comply these requirements can hinder AUP approval.

The IBC requires enrollment in the R-OHSP before any contact with biohazards. Additionally, the IBC requires documented lab-specific training on biohazard risk identification and mitigation. For certain groups, the Office of Biosafety requires online training for work with Biosafety Level 1 and Biosafety Level 2 organisms. Work with Biosafety Level 3 organisms requires an intensive training curriculum that is specific to the agent. Failure to comply these requirements can hinder IBC Protocol approval.

RESPONSIBILITIES:

Compliance Offices, the URAR Director and URAR administration are responsible for:

- Collaboration with the Principal Investigator and/or Supervisor to identify occupational health risks and determine strategies for mitigation.
- Identification and referral to the R-OHSP, within protocol review and outside of protocol review, of those groups and individuals that should be enrolled in the R-OHSP.
- Confirmation of R-OHSP compliance prior to protocol approval.
- Compliance oversight of laboratory and instructional spaces to help to ensure a safe working environment (primarily accomplished through the inspection process).
- Reporting of noncompliance to the relevant oversight committees and, as relevant, to the R-OHSP.
- Emergency response for occupational health incidents and referral to the R-OHSP as necessary.
- Timely communication with the R-OHSP on known occupational health incidents and/or near misses.

R-OHSP, including the Director, Nurse and contracted Physician are responsible for:

- Daily administration of the R-OHSP and R-OHSP Clinic.
- Adherence to responsibilities as outlined in the SOP RISSS-002: Occupational Health Processing⁵.
- Maintenance of professional licensure and certifications necessary to perform R-OHSP duties.
- Risk assessment and subsequent health services recommendations for R-OHSP participants.
- Communication with participants to inform and educate on occupational health risks and preventative health service recommendations.
- Availability for occupational health consultation, including cost-of-caring support, with referral to mental health services as necessary.
- Prompt communication with participants in the event of an occupational health exposure, including the provision of, or referral for, appropriate post-exposure health services.
- Collaboration with the compliance offices and URAR team on the identification of occupational health risks and strategies for mitigation, including but not limited to the occupational health review of high-risk protocols.

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- Timely communication with the relevant compliance offices and/or URAR team on known occupational health incidents.
- Confidential maintenance of employee health records, with access limited to program administrators or individuals with a clear work-related need to know.
- Limited and screened communication with participant supervisor to provide the information necessary for supervisor accountability but limited to minimal relevant information.
- Maintenance of Hepatitis B declination log.
- Maintenance of Sharps Injury log.
- Collaboration with administration for the proactive improvement of the R-OHSP.

Principal Investigators and/or Supervisors are responsible for:

- Collaboration with the compliance offices and/or URAR administration to identify occupational health risks and determine strategies for mitigation, including the creation of standard operating procedures for work with, and disposal of, occupational hazards.
- Following relevant policies and standard operating procedures such as appropriate donning and doffing of PPE and identification of animals/labeling animal cages to which hazardous agents have been administered.
- Creation of emergency standard operating procedures and coordination of emergency response in the event of an occupational health incident or injury.
- Accurate submission of all protocols to relevant compliance offices, so that occupational risks can be adequately identified and mitigation strategies developed. Protocols should be amended and approved before work process changes begin, in order to assure that any new occupational risks are identified and any newly necessary mitigation strategies are developed.
- Provision of participant access to, and oversight of, subordinate's compliance with, all relevant protocols, policies, training requirements and standard operating procedures.
- Adherence to responsibilities as outlined in the SOP RISSS-002: Occupational Health Processing5
- Identification and referral to the R-OHSP of those individuals that should be enrolled in the R-OHSP and delay of assignment of risk-related job duties until participants are officially enrolled in the R-OHSP.
- Oversight of R-OHSP Policy compliance for subordinate employees, students, and visitors that they are sponsoring, including assisting with questionnaire details regarding the nature of known workplace hazards.
- Daily oversight of laboratory and instructional spaces to help to ensure a safe working environment.
- Respectful support of subordinate and peer mental health issues, including cost-of-caring, and referral to appropriate support services, including the R-OHSP.
- Respect of employee health record confidentiality and limitation of information requests to details that are necessary for oversight of the work.
- Reporting of noncompliance to the relevant oversight committees and compliance offices and, as relevant, to the R-OHSP.
- Emergency response for occupational health incidents and participant referral to the relevant compliance offices and the R-OHSP, as necessary.

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- Timely communication with the compliance offices, URAR administration and the R-OHSP on known occupational health incidents, including all needle sticks (even clean).
- In the event of an occupational incident or injury, adherence to all UGA Workers' Compensation business processes and prompt submission of any necessary Workers' Compensation paperwork for the support of employee injuries, regardless of whether or not medical services were procured.

Participants are responsible for:

- Adherence to all relevant protocols, policies, training requirements, and standard operating procedures, including responsibilities as outlined in the SOP RISSS-002: Occupational Health Processing⁵.
- Accurate submission of R-OHSP questionnaire, including confirmation of job duties with supervisor. Resubmission of questionnaire at least every three years, or in the event of substantive changes to job duties or personal health status.
- Delay of risk-related work until active enrollment in the R-OHSP.
- Prompt communication with the R-OHSP on requests for action or information.
- Verification of any occupational health documents loaded to personal PEP SNAPSHOT Occupational Health folder.
- Daily conduct of job duties in such a manner as to help to ensure a safe working environment for everyone.
- Proactive questioning and reporting of any concerns regarding occupational safety in the workplace.
- Timely communication with the Principal Investigator, supervisor, compliance offices, URAR administration and/or R-OHSP on known occupational health incidents, including all needle sticks (even clean sticks and/or near misses).
- In the event of an occupational incident or injury, adherence to all UGA Workers' Compensation business processes, including supervisor notification, and prompt submission of any necessary Workers' Compensation paperwork, regardless of whether or not medical services were procured.

REFERENCES:

[Biosafety in Microbiological and Biomedical Laboratories, 5th ed.](#), Centers for Disease Control, 2009

[Center for Disease Control 2008 Human Rabies Prevention – Recommendation of the Advisory Committee on Immunization Practices](#)

[Guide for the Care and Use of Laboratory Animals, 8th ed.](#), National Research Council, 2011

[Occupational Health and Safety in the Care and Use of Research Animals](#), National Research Council, 1997

[Public Health Service Policy on the Humane Care and Use of Laboratory Animals](#), Office of Laboratory Animal Welfare, National Institutes of Health, 2015

SOP RISSS-002: Occupational Health Processing – available in PEP upon request

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