Approach to Completing a Safety Program Assessment

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AOA GENERAL

Agenda

- ✓ Why Care to Improve Safety Efforts
- ✓ CSU Systemwide Risk Management & EHS Audit
- ✓ Safety Program Assessment: Process to Uncover Gaps
- ✓ Good Practices to Prepare for the Audit
- ✓ Resources
- ✓ Q&A

Why Care About Your Safety Program

It’s the Right Thing to Do……..AND

There are Compliance Requirements

There are Legal Exposures

There are Reputational Outcomes

There are Operational Impacts

CAL/OSHA

- Cal/OSHA requires employers to provide a safe and healthy workplace
- This requires hazard assessment and controls to be implemented
- Cal/OSHA Standards require specific written programs, training, procedures and documentation to support the known or anticipated hazards.

Standards (California Code of Regulations):

- General Industry
- Construction
- Maritime
- Agriculture

Systemwide Risk Management & EHS Audit

CSU Environmental Health & Safety Teams

Each campus has an environmental health and safety director, and many have specialists.

Common program areas involve occupational safety, hazardous waste management, lab safety, EHS training, and environmental compliance.

The Environmental Health and Safety Policy designates EHS directors as the campus EHS Program Administrators.

They should mention in their written programs how Auxiliary organizations manage each program area.

Systemwide Occupational Safety Policies & Processes

- Environmental Health and Safety Policy
- Use of Risk and Safety Solutions lab safety software
- Annual reporting to Systemwide Risk Management
- Critical incident reporting
- EHS training through CSU Learn

CSU Environmental Health & Safety Policy

- 2009 Policy updated in 2019, 2024 & 2025
- Delegation to campus EHS Program Administrator
- Leadership responsibilities include “Auxiliaries”
- IIPP associated requirements
  - Written program/policy
  - Communications and implementation
  - Training
  - Program monitoring and maintenance,

CSU Auxiliary Organizations Policy

- President's "administrative compliance" responsibility
- "shall not operate outside the regulation and oversight of the university." (i.e., EHS Policy)
- Suspected challenges with Aux. safety programs?
  - Lack of SME
  - Lack of awareness of basic requirements
  - Separation or lack of collaboration with EHS
  - Confusion of safety responsibilities in joint activities/supervision between Aux. and Campus

Risk and Safety Solutions (RSS) Software

SRM purchased RSS in response to audit findings.

- Systemwide covered apps
  - **Hazard assessments**
  - Safety inspections
  - Chemical inventories
- Campuses get 3 free checklists
- Other apps offered at a discounted rate
- Campus and Systemwide analytics

Systemwide EHS Annual Report

Developed per audit findings

It is a program evaluation based on elements like those in the Safety Assessment: training, inspections, program updates, and other activities

Assesses intended outcomes like low injury rates and workers' compensation costs and better compliance

CSU Occupational Safety Audits

Common Findings	Systemwide Response
Employee and student training	EHS AG, SRM, and SLD are standardizing employee EHS training and adding students to CSU Learn.
Lab inspections	SRM provides a UC IT management application for this known as RSS.
Safety equipment inspections	This is a campus issue but the EHS AG, SRM, and facilities define HVAC requirements. This was audit-specific and would be good to include on routine inspections.
Hazard assessments	SRM provides a UC IT management application for this known as RSS.
Annual reporting	SRM developed a data collection reporting system and provides reporting back to the campuses and up the chain-of-command at the CO.

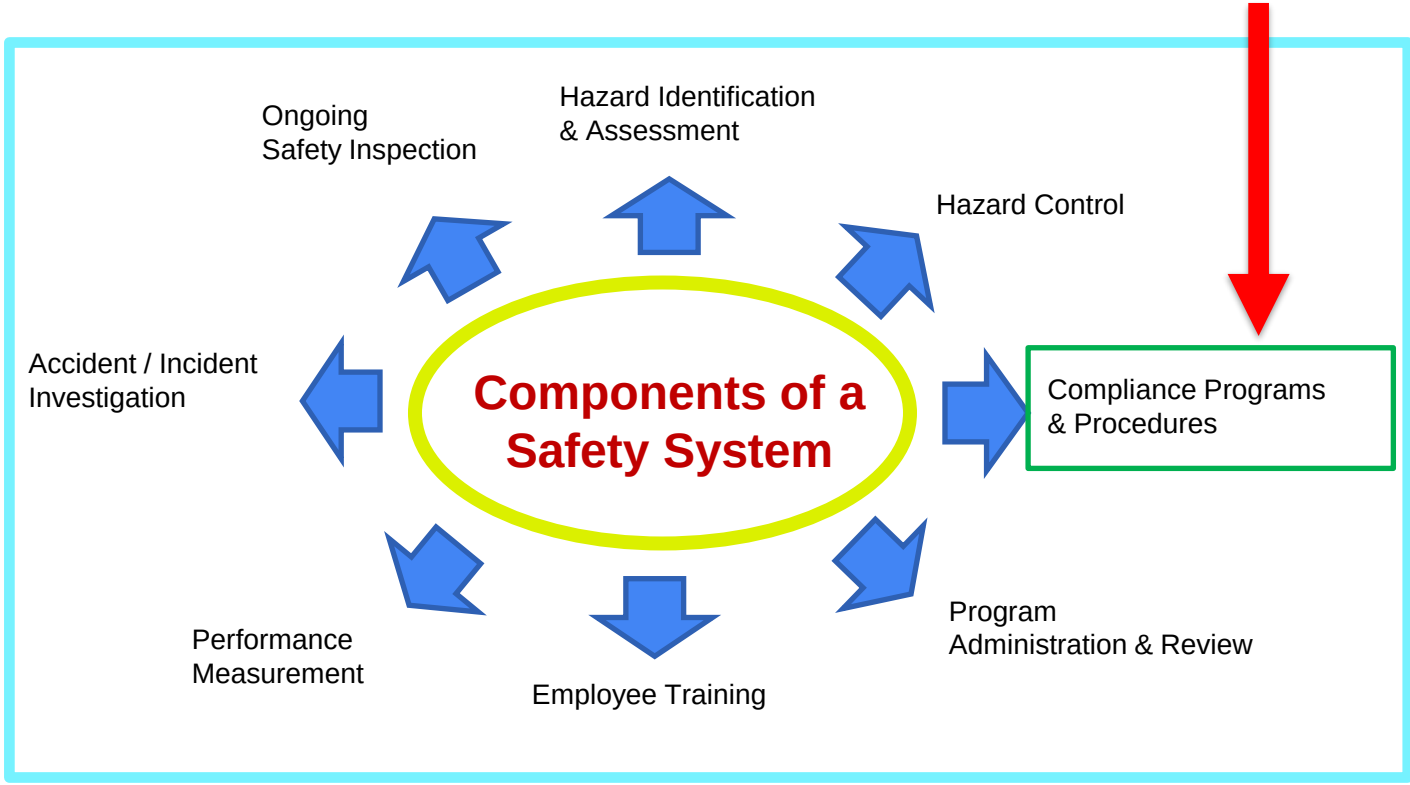
2019-20 CSU EHS Audits identified these as areas of focus. A&AS audited all 23 campuses for EHS. They followed State audits of four campuses and the Systemwide program with similar findings.

Safety Program Assessment:

Process & Outcomes

Safety System Details

Foundational to Safety Program Assessment

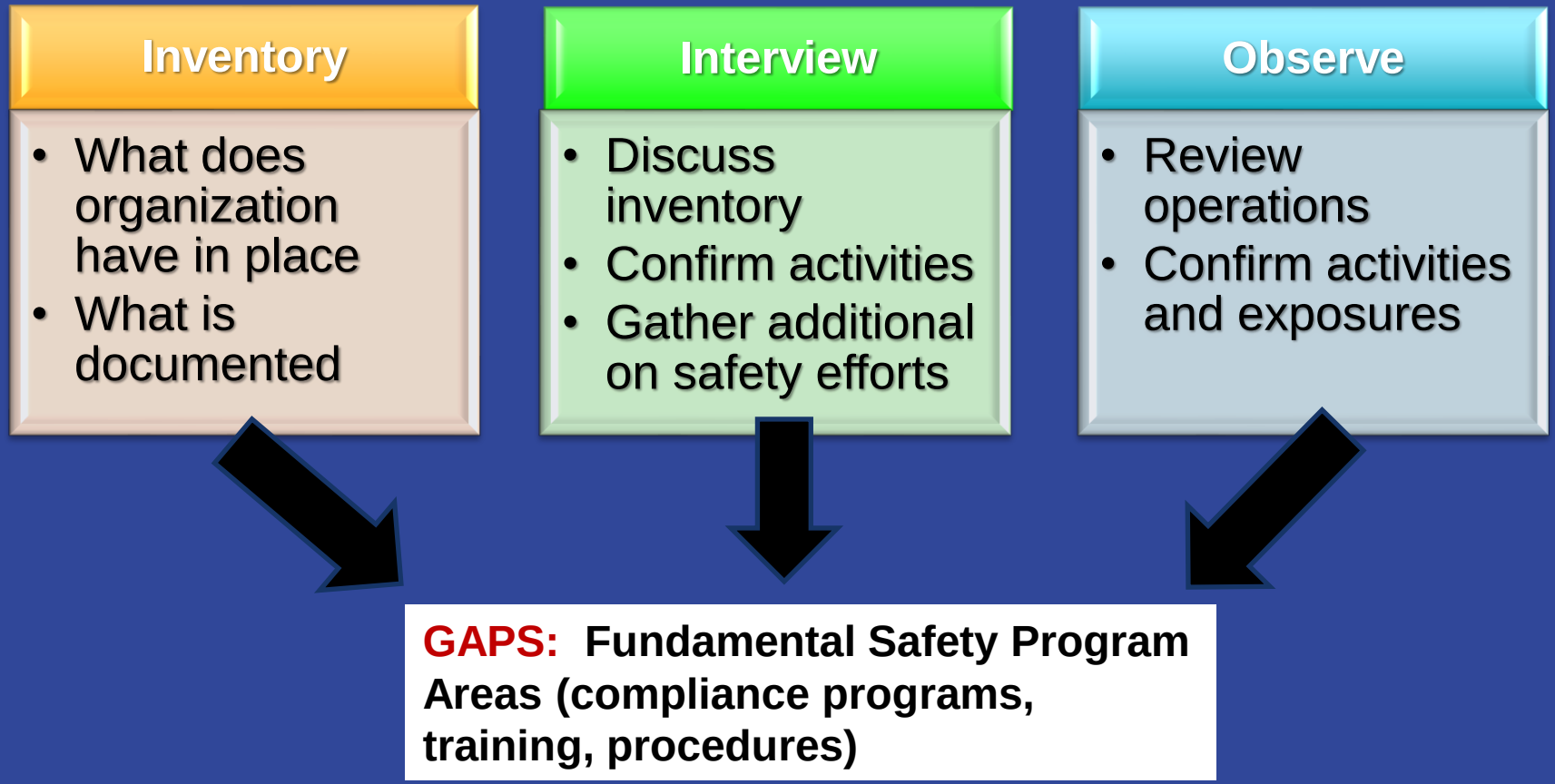


Management Commitment and Support

Why Make the Effort

- **Proactively identify gaps**
- **Involve employees in the safety improvement process**
- **Demonstrate management value of safety to the organization**
- **Identify gaps for resource prioritization**
- **Reduce surprises during audits or inspections**
- **Ensure continual safety program management**
- **Improve Understanding of Operational Exposures**

Process to Assess Safety Program Documentation



STEP #1: Collect Inventory

Inventory Goals

Collect feedback on:

- Written safety programs
- Required safety training
- Written Procedures: SOP, JHA/JSA

Completing an Inventory

Considerations Before Starting

Collect feedback to include:

1. Who is responsible for compliance safety programs?
   - ➢ Are programs managed centrally or at each department?
2. Who is accountable for determining required safety training?
   - ➢ Is there a safety training matrix in place by position?
3. Are written procedures: SOP, JHA/JSA, required and who is responsible to develop?
   - ➢ Much of this is equipment/procedure specific. Does each department have person documenting?

Inventory Spreadsheet Example

Written Cal/OSHA Compliance Programs

Complete the spreadsheet for Department written safety programs

Program Name	Last Revision Date	Created or Revised By	Include all OSHA Required Items	Departments Covered
Ex. Hazard Communication	May, 2020	Jane Doe	Unknown	All Employees
Ex. Bloodborne Pathogens	October, 2022	Jane Doe	Yes	Supervisors

Inventory Spreadsheet Example

Required Safety Training

Complete the spreadsheet with Department Employee Safety Training Programs

Name of Training	Delivery Method (Classroom, Online)	Who provides training?	Length	Training & Retraining Frequency	Method used to confirm competence (ex. Test, Exercise, Observation)	Job positions required to completed	Tracking Process (how is training completion tracked)?
Example: Hazard Communication	Online	XYZ Training company	1 hour	Initial Assignment and annually	Test	All Employees	Keep completion form in department files
Example: CPR / First Aid	Classroom	American Red Cross	8 hours	Initial Assignment, every 2 years	Test and Observation	Supervisors	Use of HR system to track completion

Inventory Spreadsheet Example

Documented Safety Procedures

Complete the spreadsheet with Department Safety Procedure documents (ex. Job Hazard Assess, Standard Operating Procedure, Safe Work Practice)

Name of Document	Last Revised	Created by	Target Dept or Job Title for Use	Tracking process for use / training?
Example: Chainsaw Use SOP	5/1/2010	Facilities Dept. Supervisor	Grounds Dept - tree mainteance crew	Employees in tree maintenance crew and supervisor review SOP, and sign off on document once supervisor confirms employee competence. Supervisor sends to HR for records

STEP #2: Interview Department Team

Interview Goals

Collect feedback on:

a) Spreadsheet data submitted

Additional information to discuss and collect

a) Accountability & responsibility
b) Safety performance metrics
c) Work responsibilities
d) Additional safety efforts

Spreadsheet Discussion

Any clear items of question

- Ex. Why confined space training (20 min), but no procedures or written program?

Expected programs, procedures or training not seen

- Expect working at heights – no fall protection program or training

What On-The-Job Training is completed

- Are there documented procedures to support training?

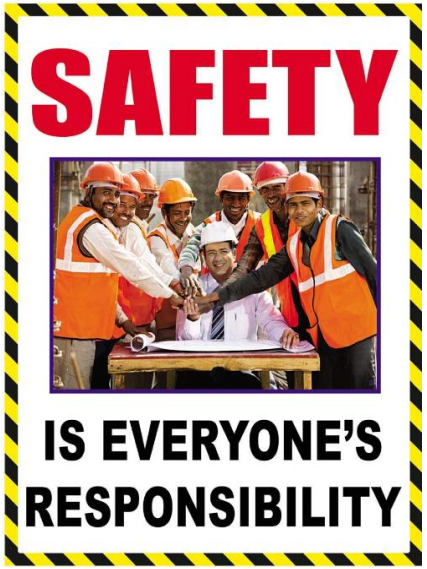
Additional Helpful Info

Safety Management Info

Collect feedback on:

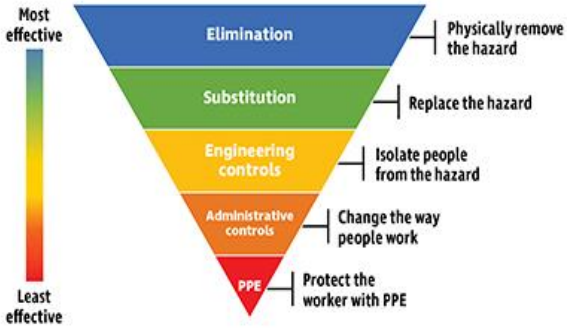
- Responsibilities for Safety
- How is Safety Measured
- Additional Safety Efforts

Responsibilities & Accountabilities



HAZARD RISK ASSESSMENT MATRIX

Frequency of Occurrence	Hazard Categories 1 Catastrophic	2 Critical	3 Serious	4 Minor
(A) Frequent	1A	2A	3A	4A
(B) Probable	1B	2B	3B	4B
(C) Occasional	1C	2C	3C	4C
(D) Remote	1D	2D	3D	4D
(E) Improbable	1E	2E	3E	4E



Leading Safety Indicators

(company logo)
Job Safety Analysis

Risk Assessment Code Matrix

Severity High to Low	Likelihood of occurrence A	B	C	D
I	1	1	2	4
II	1	2	3	4
III	2	3	4	5
IV	3	4	5	5

Task: Tripping Pipe in Hole

Required PPE: Hardhat, Safety toe Boots, Safety Glasses

Location

Date:

Reviewed by:

Tasks: Set up	Hazard:	RAC	Safety Precautions To Take:
Traveling block moving up derrick	Swinging blocks hitting sides of derrick.	1	Stabilize blocks and elevators. Do not put tongs on pipe too soon.
	Tong counterweight line getting hooked on blocks or elevators	2	Use spotter. Look up at load.

STEP #3: Operational Walkthrough

Orientation to activities, equipment and storage

Confirm expected hazards based on spreadsheet and interview:

- Orientation to the Operation and Tasks
- Focus on equipment, storage and chemical use

Goal: To identify gaps in inventory/interview and note any unexpected observations.

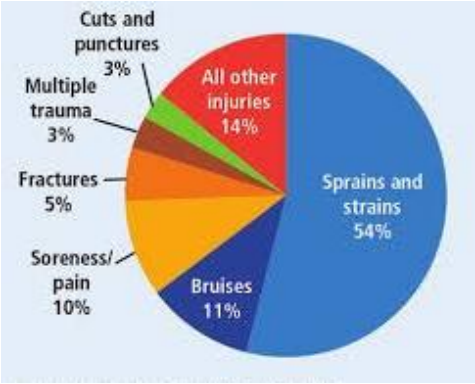
Orientation Walkthrough

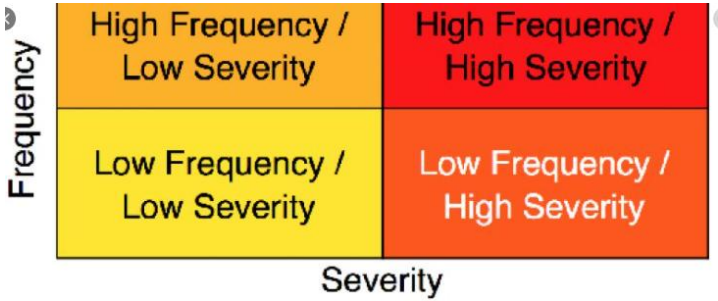
- ✓ **Goal is to relate spreadsheet and interview information to visual observations**
- ✓ **If interview did not include a work activity (ex. interview indicated no working at height, however during walkthrough of shop – a boom lift is observed), note to determine if needing to be addressed in gap analysis**
- ✓ **Observations of work activities, work areas and hazards**

What to do with results of assessment

- Use results + operational knowledge to prioritize gaps
- Near term priorities
- Anticipate resources
- Use data for discussion with management
- Establish an improvement plan
- Determine metrics (Org, Dept., Individual)

Prioritize Improvement Efforts





Establish a Safety Improvement Plan

Management Commitment

- Value of improvement to organization
- Near and longer-term objectives
- Accountability
- Performance Management (leading and lagging)
- Resources anticipated

Establish Tactical Plans

- Clearly defined deliverables
- Timelines for completion
- Ownership
- Regular review and inspection
- Regular reporting to management on status

Good Practices to Prepare for the CSU Safety Audit

2026 AOA
ANNUAL CONFERENCE

Preparing for a CSU Occupational Safety Audit

Contact your EHS office and ask for collaboration.

Start with your IIPP.

- Does the IIPP assign responsibilities? Are folks with these assignments aware?
- Review each IIPP element. Are you doing these? Is anything missing?
- Identify what might be your most hazardous operations. Are there safety procedures? Are affected persons aware?
- **What safety training do you assign?**
- **What sort of written programs do you have?**
- **What sort of safety procedures do you have?**

Review incidents

- Do you see patterns, like more injuries proportionately for a certain operation?
- Are trends improving or are there more injuries and incidents?
- What measures can you implement to prevent injuries that are affecting your unit?

Resources

Resources to Assist

1. Alliant Risk Control Team: riskcontrol@alliant.com
   - NOTE: Alliant Risk Control focused engagement
2. CSURMA website: https://csurma.org/
   - Employee & Visitor Safety Resources
   - Property Protection Resources
   - Compliance written program templates
3. Campus EHS Director
4. Systemwide Risk Management
5. Cal/OSHA Required Safety Training Matrix

AUXILIARY ORGANIZATIONS ASSOCIATION

THE NEXT ERA OF AUXILIARIES
SHAPING TOMORROW

THANK YOU!