



## ADMINISTRATIVE POLICY

<b>Policy Title</b>	Occupational Healthcare Surveillance
<b>Policy Subtitle/Subject</b>	Click or tap here to enter text.
<b>Responsible Executive(s) (RE)</b>	Sr. VP and COO, Patrick Norton
<b>Responsible Office(s) (RO)</b>	Enterprise Risk Services
<b>Primary Point of Contact from RO</b>	Executive Director of Risk
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<b>Date Proposed</b>	5/15/23
<b>Reviewed</b>	5/15/23
<b>Last Updated</b>	5/15/23
<b>Effective Date</b>	5/15/23

Permanent

Temporary

### 1.0 POLICY STATEMENT

It is the policy of Tulane University (Tulane) to provide information about occupational healthcare surveillance in a manner that is consistent with the regulations promulgated by federal, state, and municipal agencies. Tulane University supports and will strive to meet or exceed the objectives stated in the Occupational Safety and Health Administration (OSHA) and similar initiatives.

### 2.0 PURPOSE AND SCOPE

The purpose of this policy is to identify medical screening and surveillance requirements set forth by U.S. Department of Labor, Occupational Safety and Health Administration, 29 Code of Federal Regulations (CFR) Part 1910.

Medical surveillance is the systematic assessment of employees who are exposed to or expected to be exposed to occupational hazards. Employers undertake medical surveillance over time for both

individual workers and groups of workers. The goal of medical surveillance is to reduce occupational injury and illnesses of workers.

Medical surveillance is a comprehensive source of information for the employer. By conducting regular medical surveillance and analyzing the results, employers can identify work processes or worksite areas that have a potential of causing harm or injury to workers. The effectiveness of preventive strategies is evaluated by reviewing and analyzing medical surveillance of individual workers or groups of workers. Medical surveillance provides feedback for employee health concerns and issues related to the workplace.

### 3.0 APPLICABILITY OF THIS POLICY

This policy applies to personnel of Tulane University exposed to chemical, physical, and biological hazards that endanger worker health while at the workplace. Workers requiring respiratory protection must be provided medical surveillance. Medical surveillance is dependent upon exposure levels and the toxicity of the hazardous substance which the employee is exposed.

### 4.0 WEBSITE ADDRESS FOR THIS POLICY

<https://policy.tulane.edu/policy-library>

### 5.0 CONTACTS

Subject	Contact	Telephone	E-mail/Web Address
Clarification and General Information regarding Occupational Healthcare Surveillance at Tulane.	Office of Enterprise Risk Services	504-865-5653	oirm@tulane.edu

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## 7.0 DEFINITIONS

Compliance Needs Assessment (CNA) - Program owned by Enterprise Risk Services to aid in the determination of OSHA required training and medical surveillance programs. An employee must complete the CNA based on their occupational roles and responsibilities. The CNA is an electronic checklist that asks the user a series of questions. Based on the employee’s responses, it generates a personalized enrollment trajectory for the user. The CNA program is managed by Enterprise Risk Services. Note: The CNA is a tool and not meant to replace the knowledge/guidance of a supervisor. Instructions for completing the CNA are included in Appendix I.

Compliance Needs Assessment User - Employee who completes the CNA or the employee for whom the questions are recorded.

Tulane Living Well (TLW) Occupational Health Clinic - An occupational health clinic that focuses on the prevention, evaluation, treatment, and resolution of work-related injuries and is available to Tulane employees at no cost to the employee. Note: Differs from Tulane Living Well Clinic in location(s) and services rendered. Information regarding the Downtown TLW Occupational Health Clinic is included in Appendix II.

Best Management Practices (BMPs) for Occupational Health Services - A practice, or combination of practices, determined to be an effective and practicable for achieving superior outcomes. BMPs are not required by law.

## 8.0 POLICY AND PROCEDURES

### 8.1 Requirements

OSHA provides extensive guidance to employers on how to identify hazards that negatively impact employee safety and health at work and the relevant levels of medical surveillance required. Medical Screening and Surveillance are covered under OSHA’s general industry standard Part 1910 – Occupational Safety and Health Standards. OSHA standards that provide details of specific hazards and related medical screening and surveillance requirements refer to OSHA’s Medical Screening and Surveillance page.

The following regulatory standards require occupational health surveillance:

- Employees exposed at or above the action level (29 CFR 1910.95 - Occupational Noise Exposure).

- Employees required to wear respiratory protection (29 CFR 1910.134 - Respiratory Protection).
- Employees exposed to asbestos at or above the permissible limit or excursion limit for 30 days/year; perform Class 1, 2, or 3 asbestos work for 30 days/year (29 CFR 1910.1001 - Asbestos).
- Employees exposed to lead (metallic or inorganic lead) at or above the action level for more than 30 days/year (29 CFR 1910.1025 - Lead).
- Employees potentially exposed to human blood or other potentially infectious materials (OPIM) (29 CFR 1910.1030 - Bloodborne Pathogens).
- Employees exposed to formaldehyde at or above the action level (defined as at or above 0.5 parts per million for an 8-hour day or 2 parts per million for 15 minutes) (29 CFR 1910.1048 - Formaldehyde).
- Medical consults and evaluations will be provided when an employee develops signs or symptoms associated with a chemical to which the employee may have been exposed in the laboratory; or when exposure monitoring reveals an exposure is routinely at or above the action level or PEL of an OSHA regulated substance; or whenever there is a likelihood that an employee was exposed as a result of an accidental spill or release (29 CFR 1910.1450 - Laboratory Standard).
- Employees working with animals and biological organisms require specialized medical surveillance due to the unique aspects and potential hazards of these constituents.
- Workplace use of the following known or suspected human carcinogens (29 CFR 1910.1003 – 13 Carcinogens):
  - 4-Nitrobiphenyl
  - Alpha-Naphthylamine
  - Methyl Chloromethyl Ether
  - 3,3 Dichlorobenzene (and its salt)
  - Bis-Chloromethyl Ether
  - Beta-Naphthylamine
  - Benzidine
  - 4-Aminodiphenyl
  - Ethyleneamine
  - Beta-Propiolactone
  - 2-Acetylamino Fluorine
  - 4-Dimethylaminoazobenzene-
  - N-Nitrosodimethylamine
- Workplace use of the following other hazardous substances:
  - Vinyl chloride exposures at or above the action level (0.5 parts per million as an 8-hour time-weighted average) (29 CFR 1910.1017).
  - Inorganic arsenic exposures at or above the action level (defined as 5 micrograms per cubic meter of air (5 µg/m<sup>3</sup>) an 8-hour time-weighted average) for at least 30 days/year (29 CFR 1910.1018).
  - Benzene exposures at above the action level (defined as 0.5 parts per million as an 8-hour time-weighted average) for greater than 30 days/year (29 CFR 1910.1028).
  - Acrylonitrile exposures at or above the action level (1 part per million as an 8-hour time-weighted average) (29 CFR 1910.1045).
  - Ethylene Oxide exposures at or above the action level (at or above 1 part per million for an 8-hour day or 5 parts per million for 15 minutes) for at least 30 days/year (29 CFR 1910.1047).
  - Methylenedianiline exposures greater than or equal to the action level (0.5 parts per million

- as an 8-hour time-weighted average) for 30 days/year (29 CFR 1910.1050).
- Cadmium exposures greater than or equal to the action level (2.5 micrograms per cubic meter of air (2.5 µg/m<sup>3</sup>) as an 8-hour time-weighted average) for 30 days/year (29 CFR 1910.1027).
- Organophosphate at any exposure level.
- Significant and prolonged use of mercury, chlorinated solvents, heavy metals, or other solids and liquids with chronic toxicity whereas: enclosure and local exhaust ventilation are not available or ineffective, prolonged glove contact is necessary and material is capable of rapid absorption through the skin, or oral ingestion is possible from contaminated surfaces and the material is a systemic poison.
- Radioactive material usage as determined by the Tulane Radiation Safety Program.
- Lasers - Class 3b and 4 as determined by the Tulane Radiation Safety Program.

## 8.2 Responsibilities

To ensure compliance with regulatory requirements and with policies and procedures set forth at Tulane University, personnel shall act jointly with the Manager of Occupational Healthcare Surveillance, the Occupational Health Clinic and the Office of Enterprise Risk Services. This will allow the organization to identify occupational healthcare needs for the employees so they can receive applicable services. Specific responsibilities have been identified for each appointment below.

### 8.2.1 Responsibilities of Office of Enterprise Risk Services

The Office of Enterprise Risk Services (ERS) shall:

- Distribute Compliance Needs Assessment (CNA) to new employees via email based on lists provided by Human Resources.
- Review CNA results, in order to provide information to OEHS, supervisors, and employees on the requirements of the occupational health surveillance program.
- Encourage employees to self-identify any medical concerns involving occupational exposure risks.
- Evaluate this Occupational Healthcare Surveillance Plan routinely and update as needed.
- Identify trends in occupational health and collaborate with other departments to mitigate accordingly.

### 8.2.2 Responsibilities of TLW Occupational Health Clinic

The TLW Occupational Health Clinic shall:

- Upload information and forms received from CNA user/employee in the electronic health record database.
- Maintain files of employee medical clearance or restrictions.
- Schedule the appointments for occupational health services.
- Perform occupational services based on the need of the employee.
- Provide results/feedback to employee
- Contact ERS with any challenges rendering the service inefficacious.
- Encourage employees to self-identify any medical concerns involving occupational exposure risks.
- Refer employees to healthcare providers for specialized and/or follow-up needs.

### 8.2.3 Responsibilities of Employee

All Tulane University employees shall:

- Complete CNA (Instructions for completing the CNA are included in Appendix I).
- Complete all required forms with accurate information to TLW Occupational Health Clinic.
- Attend scheduled occupational healthcare appointment.
- Complete any assigned and recommended training assigned by the CNA and/or supervisors.
- Perform work-related tasks in a safe and compliant manner.
- Remain knowledgeable of risks associated with work tasks.
- Inform Occupational Healthcare Surveillance Manager of any changes to work duties so that they can be enrolled in training/programming if necessary.
- Notify ERS as soon as possible with definitive answer if the employee chooses “Not Sure” on any question during their CNA.
- Provide Safety Data Sheets to TLW Occupational Health Clinic regarding occupational exposures.
- Self-identify to TLW Occupational Health Clinic any medical concerns involving occupational exposure risks.

### 8.2.4 Responsibilities of Supervisor

All Tulane University supervisors shall:

- Review the recommended trainings and services.
- Remain knowledgeable of risks associated with work tasks of self and employees.
- Ensure their employees complete required training upon reporting to work and annually thereafter. Training is completed online through TULearn; general training can also be provided in-person by Tulane Office of Environmental, Health & Safety (OEHS) personnel.
- Ensure a complete list of trainings or healthcare surveillance is assigned to the employee.
- Respond to ERS with edits or approvals of the occupational healthcare surveillance and/or training program.
- Ensures employee completes all required training and healthcare surveillance.
- Review and update position descriptions prior to posting and hiring, to assure they accurately reflect the elements of the job including but not limited to potential exposures and hazards, personal protective equipment, and physical requirements.
- Encourage employees to self-identify any medical concerns involving occupational exposure risks.

### 8.2.5 Responsibilities of Office of Environmental, Health & Safety

OEHS shall:

- Provide general training and safety-related information that relate to Occupational Health.
- Maintain the policies, procedures, and programs that relate to Occupational Health and are housed on the Tulane OEHS website.
- Fit testing to employees in conjuncture with TLW Occupational Health Clinic.
- Investigate first reports of injury.
- Encourage employees to seek medical evaluation if necessary.
- Provide guidance and interpretations of Occupational Safety & Health Standards.

## 8.2.6 Responsibilities of Department

The employee's Department shall:

- Ensure their employees complete required training upon reporting to work and annually thereafter. Training is completed online through TULearn; general training can also be provided in-person by OEHS personnel.
- Ensure that employees are knowledgeable of the risks associated with handling hazardous materials in their work areas and emergency response procedures.
- Ensure that work practices are performed in a safe manner.
- Maintain site-specific Standard Operating Procedures (SOPs) for handling any hazardous materials present in a workspace.
- Assume responsibility for costs associated with occupational healthcare surveillance services that are rendered best management practices.
- Review and update position descriptions prior to posting and hiring, to assure they accurately reflect the elements of the job including but not limited to potential exposures and hazards, personal protective equipment, and physical requirements.
- Encourage employees to self-identify any medical concerns involving occupational exposure risks.

## 8.3 TLW Occupational Health Services and Regulatory Requirements

The Tulane Living Well Occupational Health Clinic provides regulated services in the table below.

Service	Regulation	Tulane Policy
Workplace Injuries	<a href="#">29 CFR 1904.35</a> - Recording and Reporting Occupational Injuries and Illnesses	<a href="#">Tulane Workers' Compensation website - Steps for Reporting an Injury</a>
Annual Risk Assessment and History Forms (RAHF)	<a href="#">Guide for the Care and Use of Laboratory Animals</a>	<a href="#">Tulane University Animal Handler Health Surveillance Program</a>  <a href="#">Tulane University Animal Handling Safety Website</a>

<p>Post Exposure Monitoring</p>	<p><a href="#">29 CFR 1910.1030</a> - Bloodborne Pathogens</p> <p><a href="#">1910.1018(n)</a> - Arsenic</p> <p><a href="#">1910.1028(i)</a> - Benzene</p> <p><a href="#">1910.1051(k)</a> - 1,3-Butadiene</p> <p><a href="#">1910.1027(l)</a> - Cadmium</p> <p><a href="#">1910.1003-1016(g)</a> - Carcinogens (Suspect)</p> <p><a href="#">1910.1026(k)</a> - Chromium (VI)</p> <p><a href="#">1910.1044(m)</a> - 1,2-dibromo-3-chloropropane</p> <p><a href="#">1910.1047(i)</a> - Ethylene Oxide</p> <p><a href="#">1910.1048(l)</a> - Formaldehyde</p> <p><a href="#">1910.1450(g)</a> - Hazardous Chemicals in Laboratories</p> <p><a href="#">1910.1025(j)</a> - Lead</p> <p><a href="#">1910.1052(j)</a> - Methylene Chloride</p> <p><a href="#">1910.1050(m)</a> - Methylenedianiline</p> <p><a href="#">1910.1017(k)</a> - Vinyl Chloride</p>	<p><a href="#">Tulane Worker' Compensation website - Steps for Reporting an Injury</a></p> <p><a href="#">Tulane Bloodborne Pathogen Exposure Control Plan</a></p>
<p>Tuberculosis (TB) Risk Assessment and Testing</p>	<p>U.S. Centers for Disease Control and Prevention – <a href="#">TB Screening and Testing of Health Care Personnel</a></p> <p>OSHA - <a href="#">Tuberculosis</a></p>	<p>TLW Occupational Health TB Surveillance Protocol – available upon request from <a href="mailto:tlwochealth@tulane.edu">tlwochealth@tulane.edu</a></p> <p>TNPRC Policy – available upon request from <a href="mailto:tnprcnurse@tulane.edu">tnprcnurse@tulane.edu</a></p>
<p>Vaccinations</p>	<p><a href="#">29 CFR 1910.1030</a> - Bloodborne Pathogens</p>	<p><a href="#">Tulane Human Resources COVID-19 Vaccination Policy</a></p> <p><a href="#">Campus Health Immunization Policy</a></p> <p>Note: Vaccinations will be determined by the CNA and TLW Occupational Health Clinic utilizing CDC recommendations for healthcare providers – <a href="https://www.immunize.org/catg.d/p2017.pdf">https://www.immunize.org/catg.d/p2017.pdf</a></p>
<p>Vision</p>	<p>ANSI -Z 136.1-2014 - American National Standard for Safe Use of Lasers</p>	<p>Note: Service is also a best practice for the individuals who will be driving Tulane-owned vehicles.</p>



Pulmonary Function Test	<a href="#">1910.1001</a> – Asbestos <a href="#">1910.1028(i)</a> - Benzene <a href="#">1910.1027(l)</a> - Cadmium <a href="#">1910.1048(l)</a> - Formaldehyde <a href="#">1910.134(e)</a> © - Respiratory Protection	Not applicable
Respirator Fit Testing	<a href="#">29 CFR 1910.134</a> – Respiratory protection	<a href="#">Tulane OEHS Website – Respiratory Protection</a>
Audiogram	<a href="#">29 CFR 1910.95</a> – Occupational noise exposure	<a href="#">Tulane OEHS Website – Noise and Hearing Conservation</a>

Medical related questionnaires and evaluations are confidential and completed during the employee's normal working hours or at a time and place convenient to the employee. Employees are provided an opportunity to discuss any uncertainties or concerns regarding the questionnaires with medical professionals.

#### 8.4 TNPRC Occupational Health Services and Requirements

The following requirements are required for employees working at the TNPRC:

- Clear TB surveillance current within 6 months
- Proof of measles immunity-
  - Record of 2 vaccinations
  - Titer results as proof immunity
- Negative COVID test (in line with University requirements)
- Respiratory Protection Program Clearance (if wearing a N95 or PAPR)
- Annual medical questionnaire clearance (for the Select Agent program and as part of the Essential Employee requirements)
- TNPRC Onboard training

Employees shall contact [TNPRCNURSE@tulane.edu](mailto:TNPRCNURSE@tulane.edu) for the medical questionnaire and TNPRC onboarding.

#### 8.5 Exposure Incidents and Injury Reporting

In the event of a personal injury or illness which can include, but is not limited to:

- Slips, trip, and falls;
- Cuts, abrasions;
- Sprains/strains (back, knee, wrist, etc.);
- Repetitive stress injuries;
- Bloodborne pathogen exposures (e.g., needle sticks, blood splash);
- Animal bites;
- Non-human primate exposures;
- Chemical exposures;
- Laser exposures; and

- Radiation exposures

An employee shall immediately inform their supervisor. The employee or supervisor shall report the incident to 855-433-9938. A triage nurse will direct the employee to the appropriate actions. Instructions for reporting an exposure incident or an injury are included in Appendix III.

## 8.6 Training

Workplace safety training is available to all faculty and staff and shall be renewed as prescribed by the corresponding regulatory requirements. Safety training program information can be obtained via the Tulane OEHS website: <https://risk.tulane.edu/ehs/training>.

Examples of applicable training subject matter that may be required are:

- Hazard Communication;
- Laboratory Safety;
- Respiratory Protection;
- Hearing Conservation;
- Personal Protective Equipment; and
- Bloodborne Pathogens.

## 9.0 CONSEQUENCE OF VIOLATING THE POLICY

Violation of this policy may result in disciplinary action, up to and including termination.

For consequences of violating the policy refer to the Faculty and Staff handbooks found at [policy.tulane.edu](http://policy.tulane.edu).

### APPENDIX I

Instructions on How to Complete Compliance Needs Assessment

### APPENDIX II

TLW Occupational Health Clinic and Hours of Operation

### APPENDIX III

Instructions for Reporting an Exposure Incident or an Injury

## **Occupational Healthcare Surveillance Policy**

### **Appendix I - Instructions on How to Complete Compliance Needs Assessment**

## **Occupational Healthcare Surveillance Policy**

### **Appendix II - TLW Occupational Health Clinic and Hours of Operation**

## **Occupational Healthcare Surveillance Policy**

### **Appendix III - Instructions for Reporting an Exposure Incident or an Injury**