Animal Care and Use Occupational Health Program (ACU-OHP)

I. Policy

It is the policy of California State University, Fullerton (CSUF) to protect personnel from occupational injuries and illnesses. The overall safety of faculty, staff, volunteers and students is the main focus of this program so as to not subject them to avoidable risks and/or accidental injury or illness. No person will be required to perform any task that would be considered unsafe or unreasonably hazardous.

To accomplish this, personnel who work in a laboratory or field setting having substantial contact with animals shall be provided with the proper materials, equipment, and training in accordance with federal and state requirements. This program also follows the guidelines set forth by the National Institutes of Health (NIH).

The purpose of this program is to establish a uniform set of guidelines for the handling and use of captive and wild animals at CSUF. This program will provide information regarding required health screenings, vaccinations, personal protective equipment, training, and mechanism for reporting injuries or illnesses.

This program will establish regulatory authority and responsibility of persons designated to implement and manage the program. It will assist in safeguarding the overall health and safety of personnel that may come in contact with laboratory and wild animals.

II. Authority

California Code of Regulations Title 8 sections 1510, 1511, and 3203 enforced by the California Occupational and Safety Health Agency (Cal/OSHA) provide guidelines for the general protection of personnel who work in laboratory animal facilities or have substantial animal contact.


III. Scope

The scope of the ACU-OHP at CSUF focuses specifically on all personnel (i.e., faculty, staff, students and volunteers) who use live vertebrate animals for research and instruction. Students enrolled in regular courses that involve periodic animal use but are not research-related will not formally be part of the program; students in these courses will complete
university waivers and receive training in safe and humane animal use by the course instructor. Animal use in such courses must still be approved by IACUC.

IV. Responsibilities

A. Environmental Health and Safety (EHS)

1. Develop and implement the ACU-OHP with consultation through the Institutional Animal Care and Use Committee (IACUC). Make the program available on the EHS website.

2. Designate an EHS representative to serve as a liaison to IACUC who will receive information on animal-use related occupational health hazards in IACUC protocol applications and be available for consultation and, as needed, participation in IACUC meetings.

3. Coordinate health risk assessments.

4. Maintain health risk assessment records and notify IACUC of personnel not in compliance with the ACU-OHP.

   a. EHS will coordinate timely review of medical questionnaires and communicate the results to IACUC to ensure that personnel listed on relevant protocols are in compliance prior to commencing work.

5. Provide assistance to individual faculty departments concerning implementation of the program.

6. Provide consultation and investigative action in the event of injury or illness.

7. Arrange for the disposal of animal carcasses and specimens.

8. Conduct exposure monitoring/risk assessment for personnel likely to become exposed to hazardous chemicals, infectious biological substances, radioactive materials or other hazards, including those directly related to the use of animals, the latter of which would be identified in question #9 (Human health and safety) of the CSUF Request for Approval of Animal Care and Use form.

B. The Institutional Animal Care and Use Committee (IACUC)

1. Forward “Yes” responses and any relevant information from Question #9 of the Protocol Application form to EHS for review, including the names of PIs, students, staff and volunteers who should submit Medical Health Questionnaires based on their direct exposure to live vertebrate animals, as well as a description of Job Duties completed by the PI. Email to safety@fullerton.edu or deliver to Occupational Safety and Health Specialist located at EHS Office, T-1475.
2. Provide EHS roster of personnel and their associated PIs/supervisors who are actively enrolled in the University’s ACU-OHP based on their involvement on approved IACUC protocols.

3. Consult with EHS on additional precautionary measures necessary for human health and safety in teaching and research involving live vertebrate animals.

4. Suspend a protocol if a serious violation of the protocol requirements, including risks to human health and safety resulting directly from animal use, occurs.

C. Principal Investigators (PIs)/Supervisors

1. Meet IACUC approval, documentation, and training requirements.

2. Develop protocols to mitigate animal-use related risks to the health and safety of personnel as identified in Question #9 of Protocol Application form.

3. Provide and document specialized training to personnel under their direction who work with animals.

4. Ensure this program is followed by affected employees, volunteers and students under their direction, including requiring timely completion of Medical Health Questionnaires and Job Duties forms as required by IACUC.

5. Relay reports of injuries (e.g., scratches, bites, abnormal illnesses, etc.) reported to them by employees, volunteers, and students to Risk Management/Total Wellness and EHS.

D. Director of Animal Care

1. Conduct inspections of work and animal housing areas and associated equipment to ensure compliance with CSUF’s Injury and Illness Prevention Program and to ensure that animal housing and use facilities remain secure and under appropriate restricted access.

2. Provide roster of personnel under their direct supervision who are enrolled in the University’s ACU-OHP.

3. Provide and document training to personnel under their direction, including reporting procedures for animal health and welfare concerns, and to other faculty and students seeking training for their animal-related research or teaching.

4. Ensure that this program is followed by personnel under their direction.

5. Report injuries (e.g., scratches, bites, abnormal illnesses, etc.) to Total Wellness and EHS.
6. Maintain training records for at least two years.

V. Program

A. Assessment of Potential Health Risks

1. PI or supervisor is to obtain Animal Handler Job Duty form at https://ehs.fullerton.edu, complete requested information and email back to safety@fullerton.edu. Alternatively, form can be sent via intra-campus mail or hand-delivered to EHS Office, T-1475.

2. Applicant/animal handler is to obtain Animal Handler Referral Form at https://ehs.fullerton.edu and complete requested information (highlighted). Completed referral form can be emailed to safety@fullerton.edu. Alternatively, form can be sent via intra-campus mail or hand-delivered to EHS Office, T-1475.

3. The Job Duty form is initially reviewed by EHS and then entire packet (Job Duty form and Referral Form) are forwarded to the University’s Occupational Health Provider (OHP) for evaluation. OHP will then contact applicant directly with a list of forms to be submitted back to OHP via secure website. Medical clearance or work restrictions identified by OHP are initially sent to EHS Office, and then forwarded to the appropriate PI or supervisor and IACUC Coordinator.

   a. If the OHP requires additional health evaluations, vaccinations, or treatments before clearing the applicant, OHP shall notify EHS. The EHS Office will forward additional services request to PI or supervisor.

4. PI or supervisor is to review applicant’s/animal handler’s work restriction report (if applicable) and must determine if restrictions can be reasonably accommodated. If not, then contact Human Resources for additional guidance.

   a. At no point is the applicant/animal handler required to divulge to PI, supervisor or any party other than the OHP of specific medical information that is the basis for precluding exposure to/handling of animals.

B. Vaccinations

Animal Handlers are required to be current (i.e., received within the last ten years) on their tetanus vaccination.

C. Training
An ongoing training program shall be provided that ensures all personnel working with animals are made aware of the hazards associated with such work. Principal Investigators and the Director of Animal Care shall ensure all personnel working with such animals undergo training that, at a minimum, covers the following information:

1. Hazards associated with working with animals.
2. Proper personal protective equipment.
4. Incident reporting - bites, scratches, and unusual illnesses.
5. Record keeping.

D. Personal Protective Equipment (PPE)

The PI or supervisor is responsible for arranging for personal protective equipment. The user shall ensure this equipment is properly maintained and cleaned as necessary to ensure proper function of this equipment. Storage of this equipment shall be in a designated area. Proper PPE may include such items as safety clothing, eye protection, hand and foot protection, and respiratory protection.

The level of PPE required for animal handling is dependent on the degree of hazard present and shall be determined by the PI or supervisor with the assistance of the Director of Animal Care and EHS, if needed.

Personnel required to use a respirator must be enrolled in the University’s Respiratory Protection Program. Contact EHS at x7233 to begin the enrollment process.

E. Personal Hygiene and Housekeeping

The following personal hygiene issues apply to all workers exposed to live animals and associated materials:

1. No food or drink, smoking, or applying of cosmetics is allowed where animals are used or housed.

2. No animals shall be kept overnight anywhere except in designated animal rooms or as approved by IACUC and the Director of Animal Care.

3. Gloves shall be worn at all times when handling animals on campus.
4. All procedures are carefully performed to minimize the creation of aerosols or splatters of infectious materials and waste, such as the utilization of a Biosafety Cabinet (BSC).

5. In order to decrease the risk of contaminating street clothes and spreading contamination, laboratory coats shall be worn when working with animals on campus. All work surfaces shall be decontaminated daily and after any spill of animal-related material.

6. Hand washing shall be done prior to leaving the laboratory for any reason.

7. Hand-to-mouth infections must be guarded against by practicing safe handling techniques.

F. Injury and Illness Post-Incident Procedures and Reporting

PIs and supervisors should familiarize themselves with the procedures described in the CSUF Injury and Illness Prevention Program (IIPP), which can be accessed at https://ehs.fullerton.edu/programs/safety.php. Departmental IIPPs overlap with the campus-wide Occupational Safety program with regard to: responsibilities, inspection procedures, training, corrective actions, communication and injury/illness reporting.

1. Post-Incident Procedures (On Campus)
   a. For minor injuries including cuts, bites, and scratches, wash the wound with running water and apply first aid as necessary. Report injury to PI or supervisor immediately for additional guidance, which may include evaluation by the University’s OHP.

   b. For a life-threatening emergency, dial 911. Your call is re-directed to the University Police who will perform a medical assessment to determine whether an ambulance or paramedic should be sent to your location.

2. Post-Incident Procedures (In the Field)
   a. Personnel should be knowledgeable regarding the proper methods and tools for handling animals in their natural environments. It is the PI or supervisor’s responsibility to train personnel on safe handling and emergency procedures to be instituted when working in non-laboratory environments. First aid measures, evacuation plan, and contact numbers for relevant medical professionals should be developed into a written protocol.

3. Reporting Injury or Illness
a. The PI or supervisor is to begin the incident reporting process by obtaining an Employee / Volunteer Injury / Illness Report or Student / Visitor Injury / Illness Report form, depending on their classification at https://ehs.fullerton.edu/forms/.

b. Part 1 of the form is to be completed by the injured/ill personnel (if able).

c. Part 2 of the form is to be completed by PI or supervisor (within 24 hours of knowledge of the incident).

d. Completed form is to be distributed to Risk Management/Total Wellness (CP-700), a copy sent to EHS (T-1475) and retain a copy for the department.

G. Hazardous Agents, Risk Assessments and Exposure Monitoring

1. As part of IACUC review, IACUC will notify the EHS Office of protocol applications that may pose particular biosafety, chemical or radiation hazards that are directly related to the use of vertebrate animals (i.e., response to the second part of Question #9 of Protocol Application form). EHS will also evaluate Animal Handler Job Duties forms for potential health hazards. Based on this information, EHS will review the proposed methods and assess if any risk of personnel exposure is evident and will make recommendations on the protocol to minimize exposures. This information will also assist EHS in identifying hazardous activities that require approval from the various Campus safety committees (e.g., Institutional Biosafety Committee, Radiation Safety Committee, etc.)

2. Main hazardous agents of animal work include:
   a. Zoonoses – diseases resulting from infectious agents of animals that can be transmitted to and cause infection in humans.
   b. Allergies – hypersensitivities caused by protein allergens released from animal dander, fur, feathers or secretions.
   c. Physical injuries – caused by bites, scratches, kicks or other actions of animals during handling.

Responsible Executive: Vice President for Administration and Finance
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