

# POLICY ON SAFETY TRAINING

**Date:** December 16, 2014

**Supersedes:** SS.104 "Fire Safety Training" dated 5/20/02

## I. PURPOSE

New York Medical College (NYMC) is fully committed to protecting the environment and maintaining a safe and healthy campus and workplace in accordance with all applicable federal, state and local regulations. A primary means to achieve this goal is through safety training; while safety training plays a significant role in keeping everyone safe, it is particularly important for those who may work in areas where hazards are present or hazardous conditions may occur.

## II. POLICY

All NYMC faculty, staff, students, volunteers, space licensees and contractors must complete mandatory safety training classes as determined by their job classification. This policy identifies minimum training requirements. Needs assessments may identify additional safety training required for specific hazardous work activities.

## III. SCOPE

This policy applies to all NYMC faculty, staff, students, volunteers, space licensees and contractors.

## IV. DEFINITIONS

*Annual:* For the purpose of determining when retraining is required, annual means within the past 365 days.

*Training Needs Assessment:* Assessment of the training requirements for an individual based upon (1) risk of hazards present in work activities, (2) his/her educational and professional background, (3) all regulatory requirements for training.

*Worker:* For purposes of this policy, a worker is an individual who actively performs work functions in a laboratory/technical area or who may encounter hazardous materials within the scope of performing his or her assigned duties. A "worker" may be a faculty member, staff, contractor, space licensee, student, volunteer, or a visitor/visiting scholar.

## V. PROCEDURES

- A. **New Employee Orientation.** All individuals working on the NYMC campus (regardless of their employment status) must take the appropriate "New

Employee Orientation” course provides by Environmental Health & Safety (EH&S) before they can receive NYMC ID badges. Security may not issue an ID badge without documentation that the individual has completed the required training.

1. **Laboratory Workers.** Before any laboratory worker is granted a NYMC ID badge and/or unescorted access to laboratory/technical areas, they must successfully complete the “New Employee Orientation for Laboratory Workers” course offered by EH&S.
  2. **Operations Support Staff.** Staff from the Facilities Management Department, Receiving, Comparative Medicine, Security, and EH&S are required to attend the “New Employee Orientation for Laboratory Workers” before they can be issued NYMC ID badges.
  3. **Administrative Personnel.** Administrative personnel must take the “New Employee Orientation for Administrative Personnel” before they can be issued NYMC ID badges.
- B. **Laboratory Site Safety Orientation.** Laboratory workers are required to receive a safety orientation specific to their unique laboratory work location and the processes common to their laboratory worksite. A “Laboratory Site Safety Orientation” must be performed by the supervisor on the first day the worker is granted access to or assigned work activities in the laboratory. This training orientation must be documented on the “Laboratory Site Safety Orientation Checklist,” which is provided in the orientation packet. The checklist must be completed, signed and returned to EH&S within five (5) days of the employee starting work in the laboratory.
- C. **Laboratory Worker Refresher Training.** All laboratory workers must complete refresher training on an annual basis. If annual refresher training is not completed, laboratory workers may be suspended from laboratory work until the training has been completed.
- D. **Operations Support Staff HAZWOPER Awareness Training.** Staff from Facilities Management, Receiving, Security, and EH&S must participate in HAZWOPER Awareness training (given by EH&S) on an annual basis. Components of this course comprise refresher training on topics that must be completed on an annual basis, including Hazard Communication and Bloodborne Pathogens training.
- E. **Hazard-Specific Safety Training.** Based on the outcome of the laboratory safety training needs assessment, workers must attend any training(s) on specific additional hazards that may be present in the workplace. This training may be provided by EH&S, supervisor, or other qualified person. Examples of hazard-

specific training include (but are not limited to) vivarium operations, radiation safety, Biosafety Level 3 training, or arc flash training. Visitors to certain hazardous areas on campus may require on-site training before they can enter these areas.

- F. **Site-Specific Operating Procedure Safety Training.** This training is generally most appropriately provided by the site supervisor or qualified departmental staff and is focused on the specific procedures and activities unique to the worker's primary work place. These operating procedures may include work with particularly hazardous substances, pyrophoric chemicals, lasers, machine tools, autoclaves, etc. This type of training is intended to address specific topics not covered by the trainings described above.
  
- G. **Contractor Safety Training.** In keeping with NYMC's "Contractor Safety Policies and Procedures, the contractor must provide safety training for its employees, and such training shall include, but not be limited to:
  - 1. Disclosure of potentially dangerous conditions in the workplace;
  - 2. An explanation of how to perform the work safely;
  - 3. Training on the proper operation of personal protective equipment (PPE);

Training programs must comply with all applicable federal, state and local standards. Documentation of training is subject to inspection by EH&S. Certain projects may require proof of completion of the OSHA 10-hour Construction Safety course, or proof of current HAZWOPER certification. This requirement is project-specific; consult EH&S for more information.

- H. **Student Fire Safety Training.** In keeping with the New York State Office of Fire Prevention and Control (NYS OFPC) guidance on instruction for college and university students, all NYMC students (with the exception of distance learning students) are required to take fire and life safety training.
  
- I. **Training Documentation.** Training documentation must include at minimum: the full name of the individual trained; full name of the individual(s) providing the training for instructor-led training; date of the training; and a brief description of the training topics covered. Training records must be retained for three years.

## VI. EFFECTIVE DATE

This policy shall be effective as of the date signed.


## VII. POLICY RESPONSIBILITIES

- A. New York Medical College faculty, staff, students, volunteers, space licensees, and contractors.**
1. Completes all required training within allowable time parameters.
- B. Principle Investigators/Supervisors/Managers**
1. Provides site-specific training for employees, students and visiting faculty to include the specific hazards present in their workplace;
  2. Requests assistance with specialized training when needed;
  3. Ensures that all individuals under their supervision have completed all safety training requirements.
- C. Department Chair, Director, and/or Administrators**
1. Works with representatives of EH&S and departmental supervisors to identify training needs of their departments;
  2. Ensures that all departmental employees receive the appropriate safety training;
  3. Ensures that all departmental employees receive the appropriate safety training within established time frames.
- D. Department of Environmental Health & Safety**
1. Identifies institutional safety training needs;
  2. Ensures that these requirements are communicated to departments, supervisors and managers;
  3. Monitors institutional compliance with safety training requirements;
  4. Provides information on institutional and departmental compliance to the safety committees, administration and departments;
  5. Provides training materials, assistance and programs to address institutional requirements;
  6. Assists supervisors on how to identify and provide training for specific workplace hazards.

## VIII. POLICY MANAGEMENT

Responsible Executive: Senior Vice President and Chief Financial Officer  
Responsible Officer: Director, Environmental Health & Safety  
Responsible Department: Environmental Health & Safety

### APPROVED:

  
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Edward C. Halperin, M.D., M.A.  
Chancellor for Health Affairs and  
Chief Executive Officer

12/16/14  
Date