

Cleveland State University

Proposed Elements of an Exposure Response Procedure

In conjunction with a chemical spill or release, should evidence indicate that a potential exposure has taken place, CSU personnel shall take the following actions:



1) Incident Response

- a. Upon notification of a chemical spill or release, representatives from the Department of Environmental Health and Safety will respond. Supervisory personnel from the affected department shall also respond. The administrative head of the affected department shall also be notified.
- b. If not already notified, Campus Police Dispatch shall be informed of the location of the incident, and advise they inform the Shift Supervisor.
- c. If any individual sustains injury or are experiencing immediate acute health effects and symptoms, request EMS through CSU Police Dispatch.

2) Incident Investigation

- a. As with accident investigations, primary responsibility for incident investigation is the responsibility of the area supervisor.
- b. Identity and contact information of individuals who may have been exposed should be obtained as soon as possible and provided to EHS. Electronic format is preferred - see the attached example (Appendix A).
- c. If the investigating EHS officer does not get the exposure information immediately, he will notify the Director of EHS for resolve.

3) Notification Form Letter

- a. Draft notification form letter will be developed and approved for use by the University General Counsel's Office. This is to ensure we have letter content ready to go in the event of a potential exposure situation. See attached form notification letter (Appendix B).
- b. In the event of a potential exposure situation, EHS will fill in the date, time, location and a brief description of the incident using the pre-approved notification form letter. EHS will submit the notification letter addressed to the affected employee/student(s), to the University's General's Counsel's Office for approval. Submission by EHS and approval by General Counsel's Office need to be timely. If no response is received within four (4) hours of submission to General Counsel's Office, it is understood the letter will be mailed out.

4) Notifications - Written

- a. Notifications are facilitated by EHS and need to be timely. It is the goal is to send out notification within twenty-four (24) hours from the time the incident was reported, or as soon as possible thereafter should the incident occur over a weekend.
- b. Reference to informational meeting shall be included in the notification form letter, but that specific information as to the date, time and location will be provided under a separate letter once the details are established.

- c. Upon approval receipt, Campus Safety Administrative Assistant shall generate the notification letter and submit to John J. Boyle, III, Vice President for Business Affairs and Finance for signature. Campus Safety Administrative Assistant will send out letter through normal University mailing process.
 - i. If after hours, EHS personnel will take letters and mail through local post office and obtain a receipt for charges incurred. Reimbursement for costs will be facilitated through the University Petty cash process.

5) Notifications – Methods of Contact

- a. The Campus Safety Administrative Assistant shall notify affected parties using the following approved methods:
 - i. Email (text to be reflective of notification letter)
 - ii. Notification Letter sent via First Class Mail
 - iii. Notification Letter sent via Certified Mail
- b. Group email may be used if all recipient names are blind copies to insure anonymity and HIPPA compliance

6) Medical Surveillance

- a. If indicated, EHS will recommend that an employee or student undergo a medical evaluation and possible testing for potential exposure. An agreement for these services for employees currently exists with:

St. Vincent’s Occupational Medicine Center
2322 East 22nd Street
Cleveland, Ohio 44115
(216) 363-2691, Ext. 5
Hours: Monday – Friday 7:30AM – 6:00pm



During non-business hours, potentially exposed person(s) shall be referred to St. Vincent Charity Hospital Emergency Room.

- b. As authority for payment for medical services by Human Resources is limited to payments on behalf of employees, costs for initial testing and medical evaluations related to students will be billed to the responsible department as determined by the University Administration.
- c. Efforts will be made to obtain a medical information release form from each person referred for medical evaluation. See attached example of medical release form (Appendix C). Refusal to comply with this request shall NOT be used by any University personnel in any determination or delay of any treatment, testing or other medical evaluation services as otherwise determined or warranted.
- d. Reports will be sent to CSU Human Resources and Labor Relations Department. They will facilitate copies to EHS

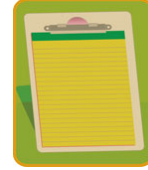
7) Informational Meetings

- a. Will be scheduled and held in the department in which the incident took place
- b. Reference to informational meeting shall be included in the notification form letter, but that specific information as to the date, time and location will be provided under a separate letter once the details are established.

- c. This will allow time to schedule attendance of qualified personnel to address questions on behalf of the university

8) EHS Report

- a. EHS will solicit copies of documentation related to the incident, including but not limited to departmental reports, police reports, exposure reports, etc... and will issue a report to the Executive Director of Campus Safety.



Appendix A

List of potential exposed individuals

EXAMPLE

The following is a sample format that is intended to assist the area supervisor and/or administrator in obtaining the appropriate information needed from potentially exposed individuals to make contact and forward the notification letter.

Location of Incident (Building/Room) _____

Lab/Area Supervisor _____

John K. Joyce
2384 West 6th Street
Cleveland, Ohio 4415
#987394
216-478-4982
jjoye@wildnet.com
Contract Employee
Name of Firm

Mary K Ownens
2937 Erne
Strongsville, Ohio 39043
#432764
440-344-9234
Own34@pic.net
Student#2983746

The following information shall be forwarded to Shirley Lute, Campus Safety no later than

(Insert Date/Time)

EHS Representative

Date/Time

Appendix B

Draft Notification Form Letter

DATE

Via Certified Mail

Dear :

You are receiving this notification because you have been identified as having been present at Cleveland State University (CSU) in *INSERT BUILDING AND ROOM NUMBER* during the approximate time period beginning on *INSERT DATE AND TIME*.

INSERT BRIEF DESCRIPTION OF INCIDENT

Based on your believed presence in this area during the time interval indicated above, we are recommending that you receive medical evaluation for potential *INSERT TYPE OF EXPOSURE*. This evaluation will be provided at no cost to you and can be obtained at St. Vincent Charity Occupational Health Center located at 2322 East 22nd Street, Cleveland, Ohio. To arrange for this evaluation, contact St. Vincent Charity Occupational Health Center at (216) 363-2691, Ext. 5, or simply walk in.

An informational meeting will be held on *INSERT DATE, TIME AND LOCATION*, for any interested parties.

Sincerely,

INSERT UNIVERSITY OFFICIAL NAME AND TITLE

Appendix C

Medical Release Form