



POLICY ON OCCUPATIONAL HEALTH PROGRAM FOR PERSONNEL WITH OCCUPATIONAL ANIMAL EXPOSURE

Dated: February 16, 2016

Supersedes: None

I. PURPOSE

New York Medical College (the “College”) is committed to maintaining a safe and healthy research environment where exposure to biological, chemical, and physical health hazards is kept to acceptable levels. In an effort to promote a safe, healthy research environment, mitigate risk and ensure compliance with applicable local, state and federal regulations, the College has established this Occupational Health Program (“OHP”) for all personnel having direct or indirect contact with research or teaching animals.

II. POLICY

It is the policy of the College to require all individuals who have direct or indirect occupational exposure to animals to enroll in the College’s OHP in accordance with applicable laws and the procedures in this Policy.

III. SCOPE

Enrollment in the OHP is required for anyone who has direct or indirect occupational exposure to animals, including (but not limited to) the following groups:

- Faculty, staff, volunteers, students and space licensees listed as project personnel on approved animal care and use protocols
- Animal care staff responsible for the care of research and teaching animals
- Service workers (including contractors) entering animal facilities to perform routine maintenance and support
- Institutional Animal Care and Use Committee members

- Other College staff needing access into animal facilities (e.g. Security, Facilities Management, Housekeeping, etc.)

IV. DEFINITIONS

Animal Facilities: refers to the Department of Comparative Medicine, as well as any other areas at the College where animals are housed and/or animal research is conducted.

Authorized Personnel: for the purposes of this Policy, any person who has received the appropriate clearance and training to work in or have access to research laboratories and/or animal facilities at the College. This includes, but is not limited to, faculty, students, staff, and volunteers. This term does not refer to visitors, or observers.

Institutional Animal Care and Use Committee (IACUC): oversees the Institution's animal care and use program and facilities. Research involving any live vertebrate animal requires the submission of an IACUC protocol, and the approval of the protocol by the IACUC.

Institutional Biosafety Committee (IBC): the committee responsible for the safe conduct of biological research at the institution. Research involving any human and/or animal pathogen requires the submission of an IBC application and approval by the IBC.

Visitors: individuals visiting an animal facility for a single day who are constantly accompanied by Authorized Personnel.

V. PROCEDURES

A. OHP Participation and Applicability. All individuals working in or having access to the College research laboratories or animal research facilities must participate in the OHP for Laboratory and Animal Research as delineated in this section unless specifically exempted.

1. Authorized Personnel. All personnel with direct or indirect occupational exposure to animals must participate in the OHP for Laboratory and Animal Research, and will not be authorized for animal facility access until EH&S has received documentation of clearance from Health Services. Non-NYMC Research Personnel

(Independent Contractors and Space Licensees). Individuals in this category must participate in the College's OHP unless they participate in an OHP provided by their employer comparable to the College OHP. In order to gain access to the College animal facilities, individuals in this category must present the appropriate clearance forms from their occupational health programs, which must be signed by the manager of that OHP to EH&S for review. EH&S reserves the right to decline outside clearances and require individuals to enroll in the College's OHP. This may include, but is not limited to: required training, medical evaluation, required vaccinations, respiratory protection program, and other elements of the College's OHP. The cost for compliance (e.g., vaccinations, medical evaluation, etc.) will be the responsibility of non-College personnel and independent contractors.

2. Visitors. Individuals who need access to animal facilities for a single day (e.g., inspectors, visitors; prospective students) are categorized as visitors and are not required to enroll in the OHP program. These individuals will be accompanied by and follow the instructions of Authorized Personnel at all times while in the College animal facilities. It is the responsibility of the Authorized Personnel accompanying such individuals to inform them of appropriate occupational health and safety risks and to ensure that they abide by all the College's research laboratory and animal facility policies and procedures. Visitors must complete a visitor's waiver (Exhibit A) in advance of entry into any animal facilities.

B. OHP Enrollment. The medical provider for this OHP is the Department of Health Services. The extent and level of participation of such personnel in the OHP is based upon a risk assessment of the hazards posed by their assigned duties and the applicable setting including: animals and hazardous materials used, exposure intensity, duration, and frequency; susceptibility of personnel; and history of occupational illness and injury in that workplace.

1. Risk Assessment. All individuals working in animal facilities, including all research personnel listed on all IACUC and some IBC protocols, or subsequently added to such protocols, must have a risk assessment performed by EH&S and Health Services for work

in the area(s) of research as outlined in the protocol. Depending on the outcome of this risk assessment, an individual may require further assessment and/or medical services (i.e., immunizations, testing, and/or recommendations for specific types of personal protective equipment (PPE)).

2. Allergy Surveillance. All individuals with direct or indirect occupational exposure to animals must complete an allergy surveillance form, which will be assessed by Health Services. Individuals cannot be authorized for animal facility access without the completion of this. Allergy surveillance forms must be submitted and reviewed annually; without an annual clearance, an individual will lose access to the Department of Comparative Medicine.
 3. Vaccination Requirements. Vaccinations may be required for individuals working with specific species of animals and will be dictated by the outcome of the individual's risk assessment. Required work-specific vaccinations are available from Health Services.
 4. Respiratory Protection Program. Certain individuals may be required to be medically cleared to participate in NYMC's Respiratory Protection Program, including the wearing of respirators such as N-95 masks, half-face cartridge respirators, and/or full-face cartridge respirators, and associated fit-testing. (Refer to NYMC's "Respiratory Protection Program" for additional information.)
- C. Incident Reporting. All incidents involving exposures, allergic reactions, injuries, etc. related to work with animals or directly associated with proximity to animals must be reported to and documented by Health Services.
- D. Training. Training is essential for adequate preparation to work safely with and around animals, as well as to be able to recognize the hazards that exist with respect to occupational animal exposures. The training and orientation of persons working with or in the proximity of animals shall include an overview of the OHP and information regarding enrollment in the medical evaluation and preventative medicine program components.

1. **Mandatory Training.** Personnel are required to attend all mandatory training as required by the Departments of Environmental Health & Safety and Comparative Medicine.
 2. **Documentation.** Completion of all required training must be documented in accordance with all applicable regulations.
- E. **Non-Compliance.** Individuals who fail to comply with this Policy and procedures associated with it, including participation in the OHP, will be denied access to NYMC animal facilities. Further disciplinary actions for non-compliance can result in suspension or termination of research.

VI. EFFECTIVE DATE

This policy shall be effective as of the date signed.

VII. POLICY RESPONSIBILITIES

A. Authorized Personnel:

1. Enroll in the College's OHP;
2. Comply with all applicable laws, regulations; the College policies and procedures regarding specific hazards to which they may be exposed during the period of time during which they work in a laboratory environment, with animals, or within the animal facility;
3. Complete required training and continuing education; and
4. Researchers must be listed on an approved, active IACUC protocol.

B. Supervisors of Individuals With Access to Animal Facilities:

1. Provide a safe environment for research personnel (including faculty, staff, students, and visiting scientists) working under their supervision in compliance with applicable law and regulations and College policies;
2. Provide personal protective equipment (PPE) to all personnel that will ensure adequate protection for their assigned activities; and
3. Ensure that all personnel receive training regarding risks associated with their assigned duties and the safe conduct of those duties.

C. Department of Environmental Health & Safety:

1. Establish and maintain OHP for Laboratory and Animal Research for those working in or having access to research laboratories or working with animals in research or having access to animal facilities;
2. Administer the OHP in cooperation with Health Services, Human Resources, IACUC, IBC, and EH&S.
3. Monitor compliance with training requirements designed to mitigate risk to various exposures;
4. Investigates work-related incidents involving direct or indirect occupational animal contact;
5. Collaborate with the Department of Comparative Medicine, Employee Occupational Health Services, Human Resources, and other College departments in assuring Principal Investigator and Authorized User compliance with the OHP requirements outlined in this policy.

D. Department of Comparative Medicine:

1. Monitor, and when appropriate, correct the standards of hygiene among individuals involved with animal care and use;
2. Provide an animal use orientation course as well as provide targeted training for safe use of animals in research;
3. Provide personal protective equipment (PPE) to all personnel who have contact with animals or hazardous materials within animal facilities;
4. Advise on and monitor biohazard control policies and procedures as they apply to research animal care and use in collaboration with EH&S; and
5. Monitor laboratory animals for zoonotic diseases.

E. Department of Health Services:

1. Provide pre-placement medical evaluations for personnel participating in the OHP;
2. Provide work-specific immunizations to OHP participants;

3. Provide respirator fit testing and associated medical evaluation in compliance with OSHA regulations and College's Respiratory Protection Program;
 4. Maintain a confidential medical file on each OHP participant;
 5. Evaluate and treat work-related injuries and illnesses.
- F. Institutional Animal Care and Use Committee (IACUC) - Evaluate the implementation of the OHP during the semiannual review of the College Animal Care and Use Program.
- G. Institutional Biosafety Committee (IBC) – periodically review the implementation of the OHP as it relates to protocols and/or incidents within its purview.


VIII. POLICY MANAGEMENT

Responsible Executive: Vice President, Operations


Responsible Officers: Director, Environmental Health & Safety

Responsible Department: Environmental Health & Safety

APPROVED:



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



Date