

ACTION PLAN

Agency Name: Texas State University

Date of Visit: 11/03/2014 – 11/04/2014

Agency Number: 754

SORM Risk Manager: Christine Wright

Recommendation: 15-11-01 Continuity of Operations (COOP): Resources

Details: The Director of Environmental Health, Safety and Risk Management (EHS&RM) serves as the Risk Manager and the Continuity of Operations Planner for the university. Continuity of operations planning is an ongoing program that requires continual updates, testing, training and evaluation. While Texas State University completed and timely submitted their COOP plan and continuity crosswalk to SORM, future testing, training and evaluation of the plan is required. Beginning as soon as practicable, but no later than fiscal year 2015, all state agencies are required to conduct an annual exercise of agency continuity plans and report completion to SORM. Exercises should be compliant with the Homeland Security Exercise and Evaluation Program (HSEEP) and should be sequential and progressive in terms of participants and objectives. SORM recommends that the university consider what resources, in regards to both staffing and required monetary funding, will be necessary to successfully sustain the university's COOP program. Texas State University should incorporate these required resources in their strategic plan and formally request the needed resources.

Reference: Texas Labor Code, Section 412.054, Texas State Agency Continuity Planning Policy Guidance Letter

Current Status of Recommendation (check appropriate box and comment below):

- Recommendation has already been completed
Completion Date: 10/20/2014
- Will implement with a target date of completion
Target Date: [Click here to enter a date.](#)
- No Plans to implement

Comments:

Any regulatory or code requirements by the Coop Plan were attached to the plan.

Name: Russell Clark

Date: 12/8/2014

Title/Position: Director, EHS&RM

Recommendation: 15-11-02 Risk Management: Policies and Procedures

Details:

A) Accident Investigation Procedure

Texas State University currently has a fully implemented workers' compensation accident investigation procedure. However, this procedure is not documented. SORM recommends that EHS&RM document their accident investigation procedure and incorporate the approved procedure in their safety and health manual;

Reference: RMTSA Vol. III, Section Two, Chapter 5, Subchapter 5.7 – Accident Reporting

B) Workplace Violence Policy

The university currently has documented personnel policies, including information on sexual harassment, as well as filing grievances and complaints. However, there is no policy on workplace violence. SORM recommends that the university develop and implement a workplace violence policy. Once the policy is updated, all employees should be made aware of the contents of the policy;

A sample policy template was provided to Texas State University to assist in addressing this recommendation. Additionally, SORM featured videos can be found here: <https://www.youtube.com/user/SormTX?feature=mhee>

Reference: RMTSA Vol. III, Section Two, Chapter 7, Subchapter 7.8; RMTSA Vol. IV

C) Distracted Driving Policy

While the university has an approved driving policy, it does not currently include information on distracted driving, required levels of insurance, or policies regarding employees who drive their personally owned vehicles (POV) for university business. SORM recommends that the university update the driving policy to incorporate these items. Once updated, university employees should be provided a copy and trained on the policy;

A sample policy template was provided to Texas State University to assist in addressing this recommendation.

Reference: RMTSA Vol. IV, Section Two

D) Chemical Hygiene Plan

Currently, Texas State University has a Safety Manual that contains sections on Laboratory Safety, Biological Safety, Chemical Safety, and Hazardous Waste

Disposal. SORM recommends that the university prepare a Chemical Hygiene Plan for Chemical and Biological Laboratories. Each plan should contain laboratory specific information for chemical laboratories and biological laboratories. The information contained in the university Safety Manual and the Chemical Hygiene Plan template will assist in the preparation of each chemical hygiene plan;

A sample policy template was provided to Texas State University to assist in addressing this recommendation.

Reference: OSHA 29CFR 1910.1450(e)

E) Small Appliance Policy

During the walkthrough, several areas were found to contain small appliances in service for personal use, including refrigerators, coffee makers, microwaves, space heaters, and other appliances plugged into power strips or directly to the outlets. The use of these appliances outside of a designated kitchen/break room may pose a fire hazard. Not only could a fire be started at the source of the appliance electrical connection, but at the breaker panel as well. The Texas Department of Insurance State Fire Marshal's Office 'Annual Report Regarding Findings in Conducting Investigations' identifies cooking equipment as the leading cause of fires in the workplace, accounting for 25 percent of fires in office buildings. Cooking and food warming equipment should only be present in designated areas. SORM recommends that all hazardous appliances be removed from the campus (except for designated kitchen/break room areas), and that Texas State University develops a small appliance policy to prohibit these items within all buildings.

A sample policy template was provided to Texas State University to assist in addressing this recommendation.

*Reference: RMTSA Volume III, Section 2, Chapter 6.11 Office Safety
<http://www.sorm.state.tx.us/rmtsa-introduction/rmtsa-volume-three-table-of-contents-2/subchapter-7-20/rmtsa-vol-iii-section-two-chapter-6-subchapter-6-11>, OSHA Section 5, General Duty Clause, OSHA 29 CFR 1926.154, OSHA 1910.303, OSHA 1910.399, NEC 210.19(A)(1) and Texas Department of Insurance State Fire Marshal's Office 'Annual Report Regarding Findings in Conducting Investigations' (December 2012)*

Current Status of Recommendation (check appropriate box and comment below):

- Recommendation has already been completed
Completion Date: 5/1/2015

- Will implement with a target date of completion

Target Date: [Click here to enter a date.](#)

No Plans to implement

Comments:

A,C,D,E Polices & Procedures have been approved and implemented. B. Workplace Violence Policy is currently being addressed by Texas State Universities Human Resource & Student Affairs by 01/01/2016.

Name: Russell Clark

Title/Position: Director, EHSRM

Date: 6/26/2015

Recommendation: 15-11-03 Safety: Emergency Eyewash

Details: While inspecting the “Commons” food service department, the eyewash station was found to be missing its eye flushing solution. SORM recommends that the university explore an alternate type of eyewash station, which could include an eyewash station that is plumbed through an existing sink.

“Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.”

Reference: OSHA 29 CFR 1910.151(c)

“Provide eye wash stations and showers if exposures to hazardous chemicals and airborne particles exist.”

Reference: RMTSA Volume 3, Section 2, Subchapter 6.12 Shop Safety

Current Status of Recommendation (check appropriate box and comment below):

- Recommendation has already been completed
Completion Date: 11/7/2014

- Will implement with a target date of completion
Target Date: [Click here to enter a date.](#)

- No Plans to implement

Comments:

Documentation was sent to SORM

Name: Russell Clark

Title/Position: Director, EHSRM

Date: 12/8/2014

Recommendation: 15-11-04 Safety: Fire Safety – ANSUL Spray Nozzles and Hood Filters

Details: During the walkthrough of the “Commons” food service department, a commercial range top was inspected and found to have the ANSUL fire extinguishing nozzles misaligned with the cooking equipment. Additionally, the ventilation hood filters showed signs of grease buildup. The ANSUL system should be capable of suppressing fires in the areas associated with ventilating equipment including hoods, ducts, plenums and filters as well as areas associated with cooking equipment, such as fryers, griddles and range tops. SORM recommends ensuring all appliances that utilize the ANSUL suppression system are used in accordance with NFPA standards.

“The effectiveness of an automatic extinguishing system is affected by the placement of the nozzles. For this reason, it is essential that cooking appliances be situated in the area in which they were when the extinguishing equipment was designed and installed. If an appliance is moved from under the equipment for cleaning or any other reason, it should be replaced to its original position prior to initiating a cooking operation. When appliances are on wheels or casters for ease of cleaning, it is important that the appliance be placed in its design position to ensure the fire-extinguishing system will be effective. An approved method should ensure that the appliance is returned to its appropriate position before cooking takes place. Channels, markings, or other approved methods will assist in ensuring proper placement.”

Reference: NFPA 96 – A.12.1.2.2

Current Status of Recommendation (check appropriate box and comment below):

- Recommendation has already been completed
Completion Date: 11/14/2014

- Will implement with a target date of completion
Target Date: [Click here to enter a date.](#)

- No Plans to implement

Comments:

Documentation was sent to SORM

Name: Russell Clark

Title/Position: Director, EHS&RM

Date: 12/8/2014