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Chair of the Assembly and the Academic Council
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October 22, 2012

**ERIKE YOUNG, DIRECTOR
ENVIRONMENTAL HEALTH & SAFETY
UNIVERSITY OF CALIFORNIA**

Re: Systemwide laboratory safety policies

Dear Erike:

Thank you for requesting Senate review of the draft *Personal Protective Equipment* and the draft *Laboratory Safety Training* policies. The Academic Senate as a body, and its members individually, are committed to the highest standards of excellence, both in academics and in safety. We welcome this opportunity to work with you to craft targeted, relevant, and easily implemented policies for the protection of researchers, research staff, and the research mission of the University.

The Senate conducted a limited and expedited review of the draft policies, with the University Committee on Faculty Welfare (UCFW) acting as “lead reviewer.” Unfortunately, we were unable to conduct our standard and more systematic review due to the limited time imposed by external legal requirements. Nonetheless, the Academic Council discussed and supports the recommendations generated by UCFW.

One overarching concern Senate members have is that the policy needs to accommodate individual lab flexibility and protocols; that is, it should not paint with too wide a brush. The safety standards appropriate for a chemistry laboratory may not be appropriate for other lab environments. Individual researchers should be able to customize lab safety training according to the specific work being done: researchers can identify hazardous materials and complex procedures in advance, and tailor safety protocols to them. Researchers can also identify students who are new to lab settings and who may benefit from more comprehensive training as distinct from returning lab workers who may only need refresher training programs. Allowing this type of flexibility would also better accommodate the needs of, for example, field researchers or workers who share a lab but conduct significantly different experiments or have distinctly different duties. Finally, regulations should include guidance for accommodating specific religious, cultural, or other traditions and identity expressions that may arise.

A second overarching concern for Senate members involves record-keeping and resource provision. Additional mandates for stricter record-keeping should be accompanied by the resources needed to

keep the additional records, be they additional administrative support or improved software. Moreover, the format for maintaining these records would eliminate duplication of training. Similarly, such requirements as on-site washing facilities, institutional provision of multiple sizes of gloves and lab coats of various sizes and materials should not come as unfunded mandates, but be accompanied by guidelines for success, as well as resources, when possible. Research involving extramurally funded projects should not see compliance funded from direct charges, but rather from indirect cost recovery. This is clearly an area that must be emphasized to campus administrations. This is one key area that campus-to-campus differences would have very negative consequences and could make your task much more difficult.

Lastly, the mandatory training policy development and review process outlined in the report and recommendations of the joint Senate-Administration Advisory Workgroup on Required Training (SAAWRT) can serve as a good roadmap for securing end-user feedback moving forward. This tool can help cull best practices for use as standard operating procedures (SOPs), as well as smooth the obstacles to on-the-ground implementation.

Again, we thank you for the opportunity to comment on these important policies, and we look forward to working with you to achieve a still safer and even more productive research environment here at UC. We also emphasize our support for thoughtful policies that meet the letter of the settlement agreement with the Regents and also state and federal regulations. The Senate and, indeed, the faculty of the University of California want to take appropriate measures to promote a safe workplace for its faculty, students and staff. As you move forward, it is worthwhile to recognize that UC has well-known world leaders who can help you and the University. Your interactions with groups like the American Chemical Society can be facilitated by faculty leadership.

Sincerely,

A handwritten signature in black ink that reads "R.L. Powell". The signature is written in a cursive, flowing style.

Robert L. Powell, Chair
Academic Council

Cc: Grace Crickette, Chief Risk Officer
Academic Council
Martha Winnacker, Senate Executive Director