

Laboratory Entry & Access Policy

Title/Subject: LABORATORY ENTRY AND ACCESS POLICY

Applies to: ☒Faculty ☒Staff ☒Students ☒Student Employees ☒Visitors ☒Contractors

Effective Date of This Revision: May 1, 2025

Contact for More Information: Office of Laboratory and Field Safety (OLFS)

☐Board Policy ☒Administrative Policy ☒Procedure ☐Guideline**BACKGROUND:**

This policy establishes the minimum requirements for entry and access to all University Laboratories. It applies to Lab Workers, faculty, staff, contractors, and visitors, regardless of their title and employment status.

PURPOSE:

CMU is committed to providing safe and healthy lab environments and protecting the integrity of research. The purpose of this policy is to ensure that lab entry is authorized accordingly so individuals are not inadvertently exposed to laboratory hazards and research is not compromised by unauthorized lab entry.

DEFINITIONS:

Lab Hazard and Area Preparation Form: A form used to disclose Lab hazards and methods to control hazards before non-Lab Workers enter the Laboratory to perform work. Any necessary decontamination of surfaces or preparation of the Lab to be completed by the Lab Supervisor or designee prior to non-Lab Worker entry is noted on this form.

Lab Worker: for purpose of this policy, a worker is an individual who works with hazardous materials, class 3b or 4 lasers, and/or animals in a Laboratory. A Lab Worker may be faculty, staff, graduate student, postdoctoral scholar, undergraduate student researcher, volunteer, or visitor/visiting scholar.

NOTE: Lab Worker excludes enrolled students in a teaching laboratory and individuals are participating in tours, lectures, and conferences.

Laboratory (Lab): For the purpose of this policy, a Laboratory is a space registered with the Office of Laboratory and Field and Safety. Registered Lab spaces have standard CMU Lab door signs posted with emergency contact information, entry designation, and Lab hazards noted. Spaces may include traditional Laboratories, vivarium spaces, shops, or studios. Spaces with no hazards are not required to be registered.

Student: An individual enrolled in an academic class.

Lab Supervisor: An employee with authority to hire personnel, evaluate performance, direct work assignments, apply progressive discipline, and direct resources to correct identified safety issues. The supervisor in a Laboratory may be a principal investigator, faculty member, or staff member. For the purpose of this policy, the following are ineligible to be supervisors in a Laboratory: graduate students, postdoctoral scholars, undergraduate student researchers, volunteers, or visitors/visiting scholars.

POLICY:

Lab entry must occur as outlined in this policy to keep all personnel safe and protect the integrity of research. Laboratories must be locked when unoccupied. Exceptions must be approved by the Department Chair. FOBS and card keys have dedicated entry authorization to a person so they must not be shared between workers. Some Lab spaces on campus may require worker enrollment in occupational health/medical surveillance programs before the

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Laboratory Entry & Access Policy

worker gains access, such as vivarium spaces. Therefore, the authorized entry designations must be respected.

The Vice President for Research and Innovation over sees compliance with this policy.

The Laboratory Safety Committee is responsible for promoting this policy in all research and teaching Laboratories on campus.

Directors/Deans/Department Chairs are responsible for communicating, promoting, and enforcing the policy in areas under their control.

Lab Supervisors are responsible for complying with the policy and ensuring their staff comply with this policy. They are responsible for ensuring Lab door signs are posted on all Lab entry doors.

Lab Workers are responsible for complying with this policy.

Office of Laboratory and Field Safety (OLFS) is responsible for providing interpretation and clarification regarding this policy. OLFS will also oversee Lab registration and Lab door sign completion and posting.

Environmental Health and Safety (EHS) is responsible for complying with this policy.

Failure to comply with the policy may result in the loss of privilege to work in a Laboratory at CMU.

PROCEDURE:**Lab Door Signs**

Details for Lab registration, Lab door signs, Lab entry, and Lab hazard and area preparation forms are outlined in the Lab Entry and Access Standard Operating Procedures managed by OLFS.

Lab registration information and door signs are reviewed and updated biannually by the Lab Supervisors. The signs convey emergency contact information, Laboratory hazards, and authorized entry level for individuals not working in the lab space. The authorized entry level on the sign is coded, green, yellow, or red by the Lab Supervisor.

1. Green Labs – The Lab hazard and area preparation form shall be completed by the Lab Supervisor, designee, or OLFS for work requests except for the following situations:
 - a. Custodial trash removal, paper towel refills, whiteboard cleaning, and chalk board cleaning.
 - b. Floor cleaning in teaching Labs.
 - c. Talking velocity measurements to conduct the semiannual scheduled chemical fume hood testing.
 - d. Adjusting a thermostat.
 - e. Conducting a walk-through of the Lab for a job reconnaissance (observation only), no hands-on work involved.
 - f. Testing emergency showers/eyewashes for the semiannual scheduled testing and replacing water reservoirs on non-plumbed emergency showers/eyewash stations.
 - g. Emergency/urgent situations where wither OLFS or EHS staff are on site responding to the incident. OLFS or EHS can verbally direct site safety and personal protective equipment measures.

Yellow coded Labs can be key/FOB entered after coordination with a Lab Worker from the Lab in question who is knowledgeable about hazards in the Lab. Visitors must be escorted. Note: Additional training requirements may apply for entry into yellow coded Labs.

2. Yellow Labs – Entry after coordination with the Lab Supervisor or a Lab Worker from the particular Lab space. The Lab hazard and area preparation form shall be completed by the Lab Supervisor, designee, or OLFS for work requests except for the following situations:

Laboratory Entry & Access Policy

- a. Custodial trash removal, paper towel refills, whiteboard cleaning, chalk board cleaning (no form needed, in most cases both FM and the Lab Supervisor will agree to leave the trash in the hallway when it is full).
- b. Taking velocity measurements to conduct the semiannual scheduled chemical fume hood testing (no form needed but coordinated access from Lab Worker).
- c. Adjusting a thermostat (no form needed but coordinated access from Lab Worker).
- d. Conducting a walk-through of the Lab for job reconnaissance, no hand-on work involved (no form needed but coordinated access from Lab Worker)
- e. Testing emergency showers/eyewashes for the semiannual scheduled testing and replacing water reservoirs on non-plumbed emergency showers/eyewashes (no form needed but coordinated access from Lab Worker).
- f. Emergency/urgent situations where either OLFS or EHS staff are on site responding to the incident. OLFS or EHS can verbally direct site safety and personal protective equipment measures.

Red coded Labs can only be entered by appointment and with escorted access from the Lab Supervisor or designated Lab Worker from the particular space. Non-Lab Workers must be escorted at all times. Note: Additional training requirements may apply for entry into red coded Labs.

3. Red Labs – Entry only by appointment and escorted access from Lab Supervisor or a Lab Worker from the Lab space. The Lab hazard and area preparation form shall be completed by the Lab Supervisor, designee, or OLFS for work requests except for the following situation:
 - a. Emergency/urgent situations where either OLFS or EHS staff are on site responding to the incident. OLFS or EHS can verbally direct site safety and personal protective equipment measures.

Lab Worker Entry/Access

Access control is authorized by department chairs and directors following successful completion of required training. Lab Worker requests for building and Lab entry after hours must be authorized by department chairs and directors. CMU Police Dispatch and Facilities Management will not assist with after-hours entry unless an emergency dictates it is appropriate. The expectation is that Lab Workers will have key/FOB access if needed after hours.

Contractor Entry/Access

Before contractor work in Laboratories can begin, the Lab hazard and area preparation form must be completed and signed by the Lab Supervisor or designee. This form serves to identify the Lab hazards and the controls that will be in place for safe work to proceed.

Contract entry/access is arranged through Facilities Management with the approval of the respective CMU academic department.

Support Services Entry/Access for Work Requests (Facilities Management, Office of Information Technology, Moring and Delivery, etc.)

Before work orders can be completed in Laboratories, the Lab hazard and area preparation form must be completed and signed by the Lab Supervisor or designee. **Exceptions to using the form are noted under “Lab door signs”.** The form serves to identify the Lab hazards and the controls that will be in place for safe entry/work to proceed.

The person performing the work, including contractors, has the right and obligation to delay or refuse work if a form is absent, incomplete, or unsatisfactory. When the scope of work changes, the Lab hazard and area preparation form must be revisited by both the worker providing the service and the Lab Supervisor, or their designee, to make sure the safety and controls are still appropriate.

Laboratory Entry & Access Policy

Visitors

Visitors must be escorted by CMU faculty or staff.

Central Michigan University reserved the right to make exceptions to modify or eliminate this policy and or its content. This document supersedes all previous policies, procedures or guidelines related to this subject.