

Title/Subject: **LABORATORY ENTRY AND ACCESS POLICY**

Applies to: faculty staff students student employees visitors contractors

Effective Date of This Revision: October 7, 2019

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, students, 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 Notification Form: A form used to disclose lab hazards and methods to control hazards before non-lab workers enter the laboratory. Any necessary decontamination of surfaces or preparation of the lab to be completed by the principal investigator 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. Lab worker excludes enrolled students in a teaching laboratory and individuals who only passively participate in tours, lectures, and conferences.

Laboratory: For the purpose of this policy, a laboratory is a space registered with the Office of Laboratory and Field Safety. Registered lab spaces have a standard CMU lab door sign template posted with contact information, entry designation, and lab hazards noted. Spaces may include traditional laboratories, vivariums, shops, or studios. Spaces with no hazards are not required to be registered.

Student: An individual enrolled in an academic class.

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, instructor, or staff member.

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

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require worker enrollment in medical surveillance programs before the worker gains access, such as vivarium spaces. Therefore, the authorized entry designations must be respected.

The Vice President for Research and Dean of Graduate Studies oversees compliance with this policy.

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

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

Principal Investigators/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.

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 hazard notification forms are outlined in the Lab Entry and Access Standard Operating Procedure managed by OLFS.

Lab door signs are reviewed and updated at least annually by the principal investigator. The signs convey emergency contact information, laboratory hazards, and authorized entry level for individuals not working in the lab space. The sign authorized entry level is coded green, yellow, or red by the principal investigator.

Green coded labs can be key/FOB entered by CMU employees without escort from a lab worker from the particular lab space, *provided the individual has attended lab safety awareness training*. Visitors must be escorted.

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

Red coded labs can only be entered with coordination and access from the principal investigator or staff member responsible for the space, and non-lab workers must be escorted. Note: Additional training requirements may apply for entry into red coded labs.

1. Green labs – The lab hazard notification form shall be completed by the principal investigator or designee for work requests except for the following situations:
 - a. Custodial trash removal
 - b. Taking velocity measurements to conduct the semiannual scheduled chemical fume hood testing
 - c. Adjusting a thermostat
 - d. Conducting a walk-through of the lab for job reconnaissance (observation only), no hands on work involved
 - e. Testing emergency showers/eyewashes for the semiannual scheduled testing
2. Yellow labs – Entry after coordination with a lab worker from the particular lab space plus the lab hazard notification form shall be completed by the principal investigator or designee for work requests except for the following situations:

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- a. Custodial trash removal (no form needed, in most cases both FM and the faculty/staff 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 hands on work involved (no form needed, but coordinated access from lab worker)
 - e. Testing emergency showers/eyewashes for the semiannual scheduled testing (no form needed, but coordinated access from lab worker)
3. Red labs – Entry only by appointment and escorted access from the faculty or staff member overseeing the lab plus the lab hazard notification form shall be completed by the principal investigator or designee for work requests.

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 hazard notification form must be completed and signed by the principal investigator or designee. This form serves to identify the lab hazards and the controls that will be in place for safe work to proceed.

Contractor 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, Moving and Delivery, etc.)

Before work orders can be completed in laboratories, the hazard notification form must be completed and signed by the principal investigator 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 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 hazard notification form must be revisited by both the worker providing the service and the principal investigator/designee to make sure the safety and controls are still appropriate.

Visitors

Visitors must be escorted by CMU faculty or staff.

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