



Personal Protective Equipment (PPE) Policy and Assessment Tool FAS FAQs

Q1: What is the University-wide Personal Protective Equipment (PPE) Policy and who is required to comply?

The PPE Policy is a University-wide, risk-based policy that addresses the use of personal protective equipment to ensure that the University's research, teaching, and conservation laboratories provide the appropriate PPE in order to minimize risk of injury and illness and meet regulatory requirements.

Everyone engaged in the conduct of research in the University's research, teaching, and conservation laboratories is required to comply with this Policy. The conduct of research in computational laboratories is exempt from this Policy.

Q2: Where can I find a copy of the PPE Policy?

The PPE Policy is available on Harvard's Environmental Health and Safety's (EH&S) web site: http://www.ehs.harvard.edu/sites/ehs.harvard.edu/files/lab_ppe_policy_1.pdf.

Q3: What steps do research, teaching, and conservation laboratories need to take to comply with the Policy?

- The Principal Investigator (PI), or designee, must conduct a lab-specific assessment to determine PPE requirements for activities conducted in his or her laboratory or lab-based course. EH&S has developed an online assessment tool to assist PIs with this task, see Q7. EH&S staff are also available to assist with the assessment or selection of proper PPE. EH&S' Lab Safety Program can be reached at 617-496-3797.
- The PI, or designee, must inform laboratory personnel of all PPE requirements within their laboratory, and how to obtain, correctly use, store, and dispose of PPE as necessary.
- The PI, or designee, must document PPE training using the "FAS Laboratory Safety Orientation Checklist," for new researchers, or the "Acknowledgement of Laboratory PPE Policy," for existing researchers. See attachments.
- The PI must provide any required PPE to laboratory personnel, including students, at no cost to those personnel. See Q6 for more information on available programs.
- The PI, designee, and Lab/Executive Director must make reasonable efforts to ensure that all laboratory personnel follow all PPE requirements.
- The PI, or designee, must conduct periodic (at least annual) assessments to ensure that lab-specific PPE requirements are still appropriate for present activities.

Q4: Who is responsible for enforcing the PPE policy?

Principal Investigators and designated laboratory management staff are responsible for enforcement of the Policy within their research group. Department Chairs, Lab Directors, Department Administrators, or other designated departmental managers are responsible for communicating, promoting, and enforcing the Policy in their respective research, teaching, and conservation areas.

Q5: What happens if you don't comply?

Individuals who do not comply with the PPE Policy put themselves and their research at risk. At the laboratory level issues of non-compliance should be brought to the attention of the PI immediately. If appropriate corrective action is not taken the issue will escalate to the attention of the Department Chair and Department Lab/Executive Director, followed by the Divisional Dean (Jeremy Bloxham), FAS Environmental Safety Compliance Officer (ESCO; Michael Lichten), and finally to the Dean of FAS (Michael Smith) until the issue is satisfactorily resolved.

Q6: How can PPE be acquired?

General-use cotton laboratory coats and general-use safety glasses will be supplied by the Division of Science/FAS at no cost to research, teaching, and conservation laboratory personnel, including students, who perform a research function that requires this PPE.

General-use, cotton full-length laboratory coats will be available, free of charge, through Crown Healthcare Apparel Service's Laboratory Coat Rental and Laundering Program. For more information on the lab coat program, please contact Shanna Losee, Research Operations Manager (4-5433; shanna_losee@harvard.edu)

Beginning Monday, March 19, 2012, three types of general-use safety glasses will be available, free of charge, through the VWR Stockroom located in the Biolabs Building at 16 Divinity Avenue. Researchers can choose between a general pair of safety glasses - AOSafety Lexa Safety Glasses (VWR Cat No. 47754-864), an over-the-glasses pair of safety glasses - UVEX Ambient OTG Safety Glasses (VWR Cat. No. 89095-493), or a pair of chemical resistant safety glasses - Allsafe SMC Cudas Protective Spectacles (VWR Cat No. 33001-230). These options will be featured in the Biolabs VWR Stockroom and are the only safety glasses available free of charge through the Division's PPE Program. When checking out, notify the sales staff that the glasses are being purchased as part of the Division's PPE Program to ensure the Division is charged for the glasses. Note the VWR Stockroom may carry other types of eye protection that can be purchased using PI funds.

Disposable gloves and specialized PPE such as flame-resistant laboratory coats, laser-protective eyewear, respirators, hearing protection, etc. are the financial responsibility of the PI whose lab requires the specialized PPE for the conduct of research. The PPE must be provided, at no cost, to all researchers that are required to use the PPE, including students.

Proper attire, including closed-toed shoes that cover the entire foot, is the responsibility of the individual researchers, students, and staff working in the laboratory or participating in a lab-

based course. Those wearing inappropriate attire should not be permitted to work in the laboratory.

Q7: What is the online PPE assessment tool?

The PPE assessment tool is an online application developed by Environmental Health and Safety (EH&S) to assist laboratories in reviewing laboratory hazards and in identifying minimum PPE requirements for work involving specific hazards. The estimated time to complete the assessment is 10 to 15 minutes. PIs, or designees, needing assistance with the PPE assessment tool can contact EH&S' Lab Safety Program at 617-496-3797.

The PPE assessment tool is available at: https://apps.campusservices.harvard.edu/ehsem_ppe/

Q8: If my laboratory has multiple affiliations (for example is part of a department, center, and/or museum), which should I choose when completing the online assessment?

Principal Investigators should select the department, center, or museum through which their primary appointment lies.

Q9: Who is required to complete the PPE assessment? Who has the ultimate responsibility for signing the assessment?

The Principal Investigator, or designee, of a research, teaching, or conservation laboratory is required to complete a PPE assessment at least annually. The Principal Investigator must review and sign the assessment.

Q10: Can a laboratory or department elect to require more stringent PPE policies than the minimum PPE mandated by the online assessment?

Yes, the PPE assessment tool recommends minimum PPE. The Principal Investigator or department can require additional PPE, or set a minimum PPE standard (e.g., all researchers in the laboratory must wear a lab coat) higher than that recommended by the assessment tool or EH&S. There are fields within the assessment tool where additional PPE requirements can be entered.

Q11: Do the PPE requirements apply to lab spaces (i.e., is everyone entering the lab required to don mandated PPE) or are the requirements task-specific (i.e., only those working with, or in the vicinity of, a specific hazard required to wear the mandated PPE)?

The minimum PPE requirements are task-specific. For example, only those in the laboratory working with, or in the exposure vicinity of, a hazard would be required to wear the PPE. For example, those working with BL2 agents would be required to wear a lab coat, eye protection, and disposable gloves. Others in the laboratory would not need to wear this level of PPE unless they were working with, or in the vicinity of, the BL2 materials.

Q12: Where should the lab-specific PPE assessment be posted?

The assessment should be printed, signed by the PI, and clearly posted in the laboratory. FAS recommends making copies of the signed form and attaching it to the "Site-Specific Emergency Information" section of the Emergency Response Guides posted throughout the laboratory.

Q13: When does the initial lab-specific PPE assessment need to be completed?

The initial assessment, using the EH&S online PPE assessment tool, should be completed no later than April 30, 2012.

Q14: How will Lab Directors and the ESCO know which research groups have completed the lab-specific PPE assessment and those that have not?

EH&S will provide Lab Directors and the ESCO with a report indicating which research groups have successfully completed the assessment and which are delinquent.

Q15: How often does the lab-specific PPE assessment need to be updated?

The lab-specific PPE assessment must be conducted at least annually, or whenever new, unique, or high-risk activities or equipment are introduced into the laboratory. The required PPE for the lab should be reviewed with each new person working in the laboratory as part of the Laboratory Safety Orientation process.

Q16: How can Principal Investigators and/or Departments document that the lab's PPE requirements have been reviewed with all researchers, students, and staff?

The FAS strongly recommends that all new researchers, students, and staff complete the FAS Laboratory Safety Orientation Checklist prior to working in the laboratory. This checklist includes a review of the lab's PPE requirements. PIs can use the appended form for documenting the PPE review for existing members of the research group.

Q17: How will EH&S be involved with helping with the lab-specific PPE assessment?

EH&S is available to assist PIs, or designees, as they complete the PPE assessment or with any questions regarding minimum PPE for unique hazards not covered by the assessment tool. You can contact EH&S at the number below, or flag your PPE assessment for review by EH&S using the PPE assessment tool. EH&S can be contacted with any environmental health or safety questions or concerns you may have including assistance with developing standard operation procedures (SOPs) for highly hazardous materials, processes, or equipment. EH&S's Lab Safety Program can be reached at 617-496-3797.

