



March 22, 2023

Finance and Facilities Committee

Public Safety and Compliance Program Overview

Purpose

- **Inform the board of the compliance environment associated with health and safety, environmental management, campus security, and emergency management.**
- **Provide an overview of program policies, procedures and practices.**
- **Highlight challenges and opportunities associated with program compliance.**



Overview

- **Define regulatory environment**
- **Governance and staffing**
- **Compliance programs and initiatives**
- **Challenges**
- **Plans for the future**



Portfolio of Responsibility

- **Health & Safety**
 - Workplace (Employees)
 - Classroom (Students)
 - Transportation
- **Environmental Compliance**
 - Regulation Applicability
 - Permitting
 - Permit Management
- **Campus Security**
- **Emergency Management**
 - Campus
 - Community



Regulatory Authorities

- **Federal**

- Occupational Safety and Health Administration (OSHA)
- Environmental Protection Agency (EPA)
- Department of Transportation (DOT)
- Department of Agriculture
- Department of Education
- Drug Enforcement Administration (DEA)
- Federal Aviation Administration (FAA)



- **State**

- Minnesota OSHA (MnOSHA)
- Minnesota Pollution Control Agency (MPCA)
- Minnesota Department of Health (MDH)
- Minnesota Department of Natural Resources (DNR)
- Minnesota Department of Transportation (MnDOT)



- **Local**

- County Hazardous Waste, Local Fire Marshals, Building Code Inspectors, etc.



Diesel Technology

Program Example

Governing Agencies and Regulations

- **OSHA:**
 - Equipment Inspection & Maintenance,
 - Chemical Labeling,
 - Personal Protective Equipment (PPE),
 - Flammable Liquids Management
- **EPA:**
 - Hazardous Waste Generation, Above/Underground Storage Tanks (AST/UST) Registration & Maintenance,
 - Superfund Amendments and Reauthorization Act (SARA) Tier II Reporting,
 - Spill Prevention, Control, and Countermeasure (SPCC) Plan Development
- **DOT:**
 - Annual inspections,
 - Medical Card/CDL for operators if over the road.



Hazards

- **Chemical Exposure**
- **Lacerations/Punctures**
- **Particles in Eye**
- **Crush Injuries**
- **Chemical Spills**

Nursing/Dental Program Example

Governing Agencies and Regulations

- **OSHA:**
 - Bloodborne Pathogens management, PPE,
 - Specific recordkeeping,
 - Chemical labeling
- **EPA/MPCA:**
 - Hazardous and Biohazardous Waste
- **MDH:**
 - Radiation Safety and Sanitary Requirements
- **DEA:**
 - Controlled Substances Act



Hazards

- **Blood Borne Pathogens exposures**
 - Needle sticks
 - Splash issues
- **Chemical Exposure**
- **Improper waste disposal**
- **Radiation Exposure**

Arts

Program Example

Theater Programs

- OSHA and ANSI requirements for scene shops, set builds, rigging & lighting set-ups, etc.
- NFPA guidelines for curtains, smoke vents, emergency egress, etc.

Ceramics

- OSHA requirements for silica exposure and control, glaze ingredients
- EPA Haz Waste requirements for glazes

Painting/Photography

- EPA/Local POTW Sewered Waste rules
- OSHA/NFPA Flammable Liquids Storage requirements



Governance framework

Board policy

- 5.24 - Safety and Security Compliance

System procedures:

- 5.24.1 - *Hazardous Waste Management and Donated Materials*
- 5.24.2 - *Safety and Security Standards, Rules and Practices*
- 5.24.3 - *Emergency Management*
- 5.24.5 - *Campus Security*



Compliance staffing model

Colleges and universities - Models vary:

- **4-Year Institutions:**
 - Generally separate Safety and Security Coordinators.
 - Safety Coordinators generally a stand-alone position with no reports (two institutions without dedicated Safety Coordinators)
 - Security staff may include full time, part time, contractors or students.
- **2-Year Institutions (Larger/Metro):**
 - Generally similar to 4-year institutions - dedicated roles for safety and security
- **2-Year Institutions (Smaller/Outstate):**
 - Most institutions 1 person covering all roles and limited or no security personnel

System Office:

- **Director of Public Safety & Compliance – John Dingmann**
- **Specialists:**
 - Safety (Anita Mujumdar)
 - Environment (Dan Alden)
 - Security & Emergency Management (Tracy Worsley)



Director and Coordinator Tenure

0-2 Years: 10

2-5 Years: 11

5-10 Years: 6

11+ Years: 19

Open Positions:

- **Ridgewater**
- **DCTC**
- **Hennepin Tech**



Program support

Communications and communities of practice

- AFSCME Safety Committee
- Conferences
- Safety Director calls
- College Lab Assistant Safety Team meetings

Training

- Enterprise Learning Management (ELM) system
- Specialist develop and delivered – Online/In Person

Plan and program checklists and templates

- Compliance (OSHA, MDH) – ex. Lockout Tagout program, hot work permits, hoist inspection checklists, etc.
- Best Practices
- Emerging needs



Support initiatives

Partnership:

- MnOSHA Consultation
- Construction Occupancy Protection Exposure (COPE) Visits

Minnesota State:

- Campus Assistance Visits
 - Every campus receives a Safety, Environmental or Security focused visit annually
- Technical expertise provision
 - Chemical Monitoring
 - Environmental Permitting Advice
 - Regulation Application Interpretation
- Lead exercises and trainings
- Regulator contact and coordination



MnOSHA consultation visits

Program details:

- Visits are scheduled jointly by institution and system office
- Institution determines focus and scope
- Items identified by the OSHA consultants needing attention must be corrected
- No fines

Lessons learned:

- OSHA 300 Log errors
- Electrical hazards
- Machine guarding
- Inspection documentation
- Blocked exits, panels and extinguishers

Campus Assistance Visits

Purpose:

- Assist institutions in identifying compliance and incident risks
- Gathering information on compliance status as a system
- Inform compliance program workplan and initiatives

Goals:

- Reduced risk of safety and environmental incidents
- Improved compliance with regulatory standards
- Strengthen understanding of the compliance challenges and gaps throughout the system



How do Assistance Visits work?

- Each institution receives a visit from a specialist annually
- Visits are coordinated with the campus Safety/Security Director
- Each visit has two parts
 - Review of applicable documents/records
 - Onsite visit – all or part of campus depending on need and time
- Visit reports are issued to the institution highlighting both positive observations and instances of non-compliance
- System office staff review results to identify trends and system wide gaps



Assistance Visit Outcomes

CY2022 findings and observations:

- Institution specific safety and environmental training
- Environmental reporting:
 - Timeliness
 - Accuracy and completeness
- Emergency Operations Plan:
 - Communications containing old/inaccurate information.

Feedback on first year:

- Survey of Safety and Security Directors
- 4.6/5  feedback

Challenges

Institutional capacity

- **Wide breadth and depth of regulatory requirements and standards**
 - Have no scale – campus size doesn't matter
- **Not aligned with staff capacity or expertise**

Variability in policies & programs across institutions

Change Management

Incident Reporting



Plans for the Future

Evaluate options for additional campus support focusing on Environmental compliance:

- Shared Service
- Consulting Assistance

Refine and execute the Campus Assistance Visit process

Develop additional tools and resources for campuses use

- Templates, programs, programs, forms, training

Exploring improved incident communication processes

- Communication mechanisms, responsible parties, etc.





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