



Environment, Health, and Safety

POLICY STATEMENT

Cornell University expects all employees and members of the campus community to comply with environmental, health, and safety laws and regulations. The Department of Environmental Health and Safety (EHS) maintains the programs and procedures that allow the university to uphold the highest standard of excellence in environmental, health, and safety stewardship.

REASON FOR POLICY

The university wishes to maintain a safe and healthy environment for students, faculty, staff, and visitors and continuously improve the university's culture of safety and environmental stewardship while supporting the university's teaching, research, and clinical missions. In addition, the university promotes and provides standards that are in compliance with federal, state, and local environmental and occupational health and safety laws and regulations, that demonstrate sound fiscal responsibility, and that reduce institutional liability.

ENTITIES AFFECTED BY THIS POLICY

- All units of the university

WHO SHOULD READ THIS POLICY

- All members of the Cornell University community

WEB ADDRESS FOR THIS POLICY

- This policy: www.dfa.cornell.edu/treasurer/policyoffice/policies/volumes/riskandsafety/environment.cfm
- University Policy Office: www.policy.cornell.edu

POLICY 8.6

Environment, Health, and Safety

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RELATED RESOURCES

The University's Environmental Health and Safety (EHS) management system allows the Cornell community to access forms/tools online at Cornell EHS website,

Ithaca Campus Units: <http://www.ehs.cornell.edu/>

Weill Cornell Medical College Units: <http://weill.cornell.edu/ehs/>

University Policies and Documents Applicable to Only Ithaca Campus Units

[University Policy 2.3, Smoking](#)

[University Policy 2.8, Pets on Campus](#)

[University Policy 8.3, Emergency Planning](#)

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CONTACTS

Direct any general questions about this policy to your college or unit administrative office. If you have questions about specific issues, contact the Department of Environmental Health and Safety (EHS) or other offices, as detailed below.

◆**Note:** You may file a report through [Cornell University's Hotline](http://www.hotline.cornell.edu) at <http://www.hotline.cornell.edu>.

Contacts

Subject	Cornell Ithaca Contacts	Weill Cornell Contacts
Policy Clarification and Interpretation Questions regarding: <ul style="list-style-type: none"> – Radiation Safety – Biosafety – Select Agents – Chemical Safety – Hazardous Waste – Laboratory Safety – Controlled Substances – Fire Safety – Event Safety – Occupational Health & Safety – EHS Training – Emergency Management – Emergency Response – Emergency Planning – Continuity of Operations – Environmental Compliance 	Environmental Health and Safety (EHS) (607) 255-8200 ehsdir@cornell.edu http://www.ehs.cornell.edu	Weill Cornell Environmental Health and Safety (EHS) (646) 962-7233 ehs@med.cornell.edu weill.cornell.edu/ehs
Animal Care and Use in Research	Institutional Animal Care and Use Committee (IACUC) (607) 255-3749 iacuc@cornell.edu http://www.iacuc.cornell.edu/	Institutional Animal Care and Use Committee (IACUC) iacucadmin@med.cornell.edu http://intranet.med.cornell.edu/research/iacuc/index.html
Clinical Care of Animals and Animal Facility Management	Center of Animal Resources and Education (CARE) (607) 253-4378 care@cornell.edu http://www.research.cornell.edu/care	Research Animal Resource Center (RARC) (212) 746-1022 http://intranet.med.cornell.edu/research/rarc/index.html
Emergency	Cornell University Police Department (CUPD) 911 from a campus phone or (607) 255-1111 from a cell or off-campus phone cu_police@cornell.edu http://www.cupolice.cornell.edu/	Security (212) 746-0911
Pest Management	College of Agriculture and Life Sciences, New York State Integrated Pest Management Program (315) 787-2353 nysipm@cornell.edu http://www.nysipm.cornell.edu/	Engineering and Maintenance (212) 746-2288 http://facilities.weill.cornell.edu

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CONTACTS, continued

Subject	Cornell Ithaca Contacts	Weill Cornell Contacts
Reporting Injury, Illness, or Exposure to Hazardous Substances	Cornell University Injury/Illness/Exposure Report (607) 255-8200 https://rmps-prod.hosting.cornell.edu/accinj/index.cfm	Weill Cornell Student Health Services (SHS) (students only) (212) 746-1450 http://weill.cornell.edu/education/student/student_health_services.html Workforce Health and Safety (WHS) (faculty and staff) (212) 746-4370
Reporting Incidents and Issues not Involving Injury, Illness, or Exposure	Environmental Health and Safety (EHS) (607) 255-8200 ehsdir@cornell.edu http://www.ehs.cornell.edu	Weill Cornell EHS (646) 962-7233 ehs@med.cornell.edu weill.cornell.edu/ehs
Requirements for Sponsored Projects	Office of Sponsored Programs (OSP) (607) 255-5014 http://www.osp.cornell.edu/	http://weill.cornell.edu/research/
Research Regulatory Compliance	Office of Research Integrity and Assurance (ORIA) (607) 255-5014 http://www.oria.cornell.edu/	Office of Research Integrity and Assurance (646) 962-8200 ORIA@med.cornell.edu http://weill.cornell.edu/research/research_integrity/
Universal Waste	R5 Operations and Materials Management (607) 255-1082 http://r5.fs.cornell.edu/about/howTo.cfm	Weill Cornell EHS (646) 962-7233 ehs@med.cornell.edu weill.cornell.edu/ehs
University Medical Services	Occupational Health, Gannett Health Services (607) 255-6960 http://www.gannett.cornell.edu/	Weill Cornell Student Health Services (SHS) (students only) (212) 746-1450 http://weill.cornell.edu/education/student/student_health_services.html NYP Workforce Health and Safety (faculty and employees) (212) 746-4370
Use of Biomaterials in Research	Institutional Biosafety Committee (IBC) (607)-255-7219 http://www.ibc.cornell.edu/	Institutional Biosafety Committee (IBC) (646) 962-8200 http://weill.cornell.edu/research/research_integrity/ibc.html
	Office of Research Integrity and Assurance (ORIA) (607)-255-6439 http://www.oria.cornell.edu/	Office of Research Integrity and Assurance (646) 962-8200 ORIA@med.cornell.edu http://weill.cornell.edu/research/research_integrity/

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CONTACTS, continued

Subject	Cornell Ithaca Contacts	Weill Cornell Contacts
Use of Human Subjects in Research	Institutional Review Board for Human Participants (607) 255-6439 http://www.irb.cornell.edu/	Institutional Review Board (646) 962-8200 irb@med.cornell.edu http://weill.cornell.edu/research/research_integrity/institutional_review_board/index.html
	Office of Research Integrity and Assurance (ORIA) (607)-255-6439 http://www.oria.cornell.edu/	Office of Research Integrity and Assurance (646) 962-8200 ORIA@med.cornell.edu http://weill.cornell.edu/research/research_integrity/
Use of Pesticides	College of Agriculture and Life Sciences, Occupational and Environmental Health Program (607) 255-0485 pesticides@cornell.edu http://oeh.cals.cornell.edu/	Weill Cornell EHS (646) 962-7233 ehs@med.cornell.edu http://weill.cornell.edu/ehs
Wildlife Control	Facilities Customer Service Center (607) 255-5322 fscsrequest@cornell.edu http://operations.fs.cornell.edu/customer/main.cfm	
Workers' Compensation	Medical Leave Administration (607)-255-1177 benefits@cornell.edu https://www.hr.cornell.edu/benefits/medical_leaves/	Weill Cornell Human Resources (646) 962-9247 http://intranet.med.cornell.edu/hr/general-info/policies/benefits-policies/327-workers-compensation-benefits.html

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RESPONSIBILITIES

All members of the Cornell University community are required to collaboratively abide by this policy.

All roles and responsibilities as they relate to written university environmental, health, and safety programs are specifically outlined within each related program; please refer to Cornell's Environmental Health and Safety (EHS) website at <http://www.ehs.cornell.edu/> for further clarification.

**All Cornell
Constituents
(Students, Faculty,
Researchers,
Clinicians, Staff)**

Comply with this policy and the university environmental, health, and safety programs and practices.

Comply with all federal, state, and local regulations and codes.

Manage hazards to protect the health and safety of yourself, the people who report to you, and the community.

Notify a supervisor, faculty member, or an Environmental Health and Safety (EHS) staff member of environmental, health, and safety compliance issues that you observe.

Attend, and ensure that those who report to you to attend, required environmental, health, and safety training.

Inform a supervisor and/or EHS of any EHS compliance issues of concern in the workplace, classroom, or laboratory. If desired, anonymously report health and safety concerns using the Cornell Hotline at <http://www.hotline.cornell.edu>.

Notify EHS of any regulatory agency visit or inspection related to environmental, health, safety, and/or controlled substances, so that EHS has the opportunity to accompany the regulator.

Support voluntary EHS and environmental stewardship initiatives as directed by a supervisor or EHS.

Ensure that all work-related injuries, illnesses, exposures, and environmental spills/releases are reported to EHS.

Promote the advancement of the university's culture of safety and support initiatives to continuously improve the environmental health and safety of university students, faculty, staff members, and visitors.

**Associate Vice
President/Director of
Environmental Health
and Safety**

Direct operations and services of EHS.

In cases of imminent danger to life, health, or environment, order the cessation of hazardous activity until the danger from such a condition is abated or adequate measures have been taken.

Provide objectivity, avoid conflicts of interest, and establish accountability through an organizational infrastructure that clearly delineates EHS responsibilities.

Provide voting and non-voting membership in university-led safety committees.

Provide leadership and support for the implementation of this policy.

Set priorities for institutional resources in support of the university missions and the environmental health and safety programs associated with this policy.

Promote the advancement of the university's culture of safety and support initiatives to continuously improve the environment, health, and safety of the university's students, faculty, staff members, and visitors.

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RESPONSIBILITIES, continued

Building Coordinators and Facility Coordinators

Continuously monitor facility(s) under his or her purview for fire code and safety-related violations.

Notify EHS immediately of regulatory inspections. In conjunction with EHS, escort inspection agency representatives.

Initiate and complete correction or abatement of cited facility-based violations within required timeframes.

Notify the university fire marshal and/or EHS if any violation cannot be corrected within the required time period.

Ensure that necessary repairs are made to facility-based emergency equipment, including but not limited to, chemical hoods, fire alarms, safety showers, and eye washes.

To ensure compliance needs and safety controls are included, as appropriate, support the coordination between EHS and project managers in the construction and renovation stage of facilities under his or her purview.

Promote the advancement of the university's culture of safety and support initiatives to continuously improve the environmental health and safety of the university's students, faculty, staff members, and visitors.

Department of Environmental Health and Safety

Ensure, through the work of program managers, that written programs are posted and regularly updated to meet compliance requirements for environmental, health, and safety programs.

Provide service and support necessary to facilitate compliance with environmental, safety, and health regulations, and to support university practices.

Provide resources for training, auditing, and regulatory updates.

Coordinate collaborative EHS stewardship initiatives among constituents of the university community to foster the establishment of good working relationships and trust.

Provide environmental, health, and safety oversight of university operations in the spirit of service and support.

Maintain and manage relationships with regulatory authorities and provide guidance on compliance to university community members.

Exercise confidentiality regarding sensitive subjects.

Provide emergency service, response, and support to individuals or situations for the Ithaca campus. This does not include providing law enforcement services.

Ensure that all regulatory requirement and commitments are met for formal licenses and permits (e.g., New York Department of Health, New York Department of Environmental Conservation, etc.).

Promote the advancement of the university's culture of safety and support initiatives to continuously improve the environment, health, and safety of the university's students, faculty, staff members, visitors, and neighboring communities.

Conduct hazard assessments and exposure monitoring to identify exposure controls necessary to maintain a safe work environment.

Conduct reviews and inspections of university operations and facilities to identify high-risk operations and areas of non-compliance.

Identify corrective actions and risk mitigation strategies for the university to implement.

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RESPONSIBILITIES, continued

Department Safety Representation	<p>Support the implementation of health and safety programs for colleges and units to meet their health and safety goals and obligations.</p> <p>Serve as a liaison to EHS from the department for information exchange. Promote health and safety training and workshops.</p> <p>Facilitate routine EHS health and safety inspections and assessments of work areas.</p> <p>Promote the advancement of the university's culture of safety and support initiatives to continuously improve the environment, health, and safety of the university's students, faculty, staff members, and visitors.</p>
Human Resources	<p>Refer unresolved environmental, health, and safety matters to EHS for assistance, review, and resolution.</p> <p>Administer a process that educates individuals of their rights and responsibilities as they relate to environment, health, and safety.</p>
Management (Including Academic, Research, Clinical, and Administrative Positions)	<p>Implement this policy and all other university safety practices and programs under your supervision or control; be prepared to describe how these are implemented based on best practices in your field.</p> <p>Designate and empower a department safety representative(s) to assist with the compliance of this policy and related program requirements.</p> <p>Create a safety committee(s) or group as necessary to address and coordinate environmental, health, and safety efforts, to work with the department safety representative(s) and EHS staff to address environmental, health, and safety concerns within departments/units.</p> <p>Require faculty, staff members, and students under your direction to complete required safety training and to report accidents, injuries, illness, environmental releases, and spills, as appropriate.</p> <p>Maximize environmental health and safety through assessments by university environmental health and safety professionals in your designated work areas.</p> <p>Promote the advancement of the university's culture of safety and support initiatives to continuously improve the environment, health, and safety of the university's students, faculty, staff members, and visitors.</p>
Office of Research Integrity and Assurance (ORIA)	<p>Monitor research conducted at the university to promote a culture that is in accordance with university policies and applicable external regulations and guidelines regarding animals, conflict of interest, use of human participants, biosafety, and export controls.</p>
President	<p>Delegate responsibility for all aspects of this policy's implementation.</p>
Risk Management and Insurance	<p>Collaborate with EHS to reduce risks to the university community.</p>
Safety Officer	<p>At the directive of the university president or EHS, act as a steward and/or responsible official of the university regarding environmental, health, and safety issues.</p> <p>◆Note: The safety officer position has specified authority regarding the university, often described in regulation, governmental guidelines, and/or university policy.</p>
University Sponsored Health and Safety Committee	<p>Monitor and promote health and safety compliance according to the committee's scope.</p> <p>Review and approve any Memoranda of Understanding and Agreement (MUAs), BSL-3 applications, and research-related standard operating procedures.</p> <p>Authorize suspension and/or termination of MUAs and/or personnel access privileges as deemed appropriate, and communicate such to the principal investigator for the sponsored project.</p>

PRINCIPLES

Overview

Cornell University is committed to excellence in environmental, health, and safety stewardship. This long-held commitment is demonstrated through its contributions to student education, research and patient care, as well as through institutional conduct.

Cornell University is committed to:

- Encouraging every Cornell community member to become a proponent for safety and safety education, and demonstrate this care for safety in their interactions with other community members
- Protecting human health and the environment by minimizing the adverse impacts caused by its facilities, activities, and operations
- Achieving and maintaining compliance with federal, state, and local environmental, health, and safety laws and good practices in its departments, laboratories, clinics, research centers, facilities, and operations
- Maintaining a high standard of institutional accountability for environmental, health, and safety while maintaining the independence of research and teaching
- Providing educational opportunities to students and community members
- Assessing, measuring, and continuously improving its environmental, health, and safety performance

The university's comprehensive environmental, health, and safety program is intended to protect human health and the environment, and will produce the most effective and efficient approach and system for Cornell University.

Opportunities will be identified and taken to minimize the production of wastes and the use of toxic materials, personal exposures, and pollution, and to conserve and reuse resources, as feasible. These actions will increase health and safety, satisfy regulatory waste minimization requirements, reduce regulatory burdens, and reap greater sustainability benefits.

Independent research at the university is essential to its missions and, consequently, a proper balance of scientific interests and prudent practice must be achieved. To avoid the creation of unnecessary confusion and bureaucracy, existing organizations and positions within the university will be used to the maximum extent possible to carry out Environmental Health and Safety stewardship initiatives, maintain good practices, and achieve compliance.

PROCEDURES

General Comments The procedures listed below are general procedures; please go to <http://ehs.cornell.edu/> or <http://weill.cornell.edu/ehs> for complete written programs and procedures.

Program Element	Procedures for Environmental Health and Safety	Procedures for Units and Colleges
Assessment of compliance with applicable regulations	Ensure adequate assessment of compliance with applicable regulations through onsite inspections, reviews, assessments, internal and external audits, and other means necessary to determine compliance status. Provide the tools and procedures for unit self-assessments, as appropriate.	Coordinate with Environmental Health and Safety (EHS) to assess operations and procedures for compliance and to provide information, resources, and personnel needed to complete inspections and any required corrective and preventive actions.
Corrective and preventive actions for non-compliances	Provide database and support of data collection for exposures, injuries, and releases. Assist colleges and divisions in determining appropriate corrective and preventive actions. Monitor correction of non-compliance via onsite reviews, interviews, and/or procedure verification.	Correct any identified conditions of non-compliance and report corrective actions to EHS, as appropriate.
Data collection; preparation and submission of regulatory reports	Collect and maintain university-wide data, prepare university-wide reports, maintain university-wide permits. Collect and monitor data as appropriate (certain data is required to be given to affected persons within regulatory time frames). ◆ Note: Some aspects of EHS programs require data collection and report preparation by technical staff members. All data will be reviewed and approved for regulatory submittals, including permit applications.	Collect and maintain unit- or college-specific data, as required. Report data to EHS in a timely manner as required. Provide assistance to EHS, as appropriate.
Determination of applicable requirements	Identify, interpret, and effectively communicate to the university community existing or proposed regulations.	Consult with EHS for interpretation of applicable environmental, health, and safety regulations.
Determination of required environmental, health and safety training	Provide the methods and means to determine the required environmental, health, and safety training for all faculty and staff members. Provide online and other training methods to ensure compliance with all required health and safety trainings.	Ensure that members within the organization take required environmental, health, and safety training courses. Utilize the university training system to document or ensure that documentation of training is available internally in the unit or college.
Emergency planning	Provide campus leadership in identifying potential emergency scenarios and their appropriate responses.	Work with EHS to ensure that emergency plans are appropriate and operational.
Hazard identification and assessment	Provide expert assistance in identifying and assessing workplace hazards and regulatory requirements, and in the development and oversight of protection strategies.	Work with EHS staff to address hazards in a transparent system that meets regulatory expectations.
Inspection follow-up activities	Document and report and identified conditions of non-compliance to EHS, University Counsel, Risk Management, the department chair, and senior administrator, as appropriate. Facilitate any corrective and preventative actions.	On behalf of the university, provide to EHS information, resources, and personnel to conduct inspections as they relate to environmental, health, and safety issues, for any required corrective and preventive actions.

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PROCEDURES, continued

Program Element	Procedures for Environmental Health and Safety	Procedures for Units and Colleges
Liaison with regulators	<p>Interact with regulatory entities on behalf of the university on environmental, health, and safety issues. Collaborate with units on communication strategies appropriate to the program and expertise of the individuals involved.</p> <p>◆Note: EHS always has primary responsibility regarding EHS regulators, including cases of regulatory liability, noncompliance, enforcement, university-wide permits, and inspections.</p>	<p>Immediately notify EHS of any regulatory agency inquiry, inspection, or enforcement activity on environmental, health, and safety issues. EHS must have the opportunity to accompany a visiting regulator. Collaborate with EHS on communication strategies appropriate to the program and expertise of the individuals involved.</p>
Operating in compliance	<p>Provide units with assistance and proper technical resources for programs and procedures and the implementation of environmental, health, and safety practices to ensure compliance with laws and regulations.</p>	<p>Promote a culture in which all operations and processes are conducted in compliance with regulations, including development and implementation of written standard procedures.</p>
Regulatory submittals	<p>Review documents, maintain file copies, and share this information with appropriate project managers to help ensure consistency in the descriptions and assessments of impacts.</p>	<p>Obtain EHS authorization for all environmental-, health-, and safety-related regulatory submittal documents prior to submission to any external regulatory agency.</p>
Reporting incidents not involving injury, illness, or exposure	<p>Maintain and support the incident reporting systems. Investigate incidents not involving injury, illness, or exposure. Coordinate investigations with other affected units (e.g., Facilities). Provide recommendations to address initial incident and minimize potential for recurrence. Assess broader risk to the university and provide appropriate recommendations to mitigate risks. Provide training and assistance, as appropriate, to address potential environmental, health, and safety concerns.</p>	<p>Report incidents not involving injury, illness, or exposure as detailed in the "Contacts" section of this policy. Assist EHS in the investigation process. Assist and provide resources to address incidents, as appropriate.</p>
Reporting of injury, illness, and exposures, that are work/research related.	<p>Maintain and support the injury, illness, and exposure reporting systems. Coordinate accident reporting with medical providers, conduct accident investigations with injured personnel, and provide recommendations to affected personnel, units, or colleges. Assess broader risk to the university and provide appropriate recommendations to mitigate risks. Provide training to prevent workplace injury and illness. Respond to units' health and safety concerns.</p>	<p>Ensure that injured students, faculty, or staff seek immediate medical attention from appropriate medical providers and report injuries as detailed in the "Contacts" section of this policy.</p> <p>Assist and provide resources necessary to implement accident investigation recommendations and reduce risk of accident recurrence.</p>

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