

<b>College Procedure:</b>	<b>304.12 – OSHA Inspections</b>
<b>Policy Reference:</b>	<b>304 – Campus Safety and Security</b>
<b>Responsible Department:</b>	<b>Facilities &amp; Public Safety</b>
<b>Approval Authority:</b>	<b>Cabinet</b>
<b>Procedure Owner:</b>	<b>Vice President, Facilities &amp; Public Safety</b>
<b>Effective Date:</b>	<b>8/12/2014</b>

**Version Number:** 3  
**Legal Counsel Reviewed (yes/no):** No  
**Legal Reference(s):**  
**Scope:** College-wide

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## Reason for Procedure

State and Federal Occupational Safety and Health Administrations (OSHA) are authorized to conduct workplace inspections to determine whether employers are complying with standards and providing a safe and healthful workplace. This procedure outlines information on OSHA inspections and processes in the event of an OSHA inspection.

## The Procedure

### Inspection Information:

OSHA has established a system of inspection priorities which are conducted without advance notice. Kirkwood Community College will cooperate with inspections and will not interfere. Inspection categories are as follows:

- Imminent danger situations are given top priority. OSHA becomes aware of these situations through reports received from employees, the general public or direct observation by an investigator. When an imminent danger situation is identified, the OSHA investigator will require the hazard be immediately abated and endangered employees removed from exposure.
- Second priority is given to fatal accidents and catastrophes. OSHA considers catastrophes to be accidents resulting in hospitalization of three or more employees or one fatality. All fatalities and catastrophes must be reported within eight hours to Iowa Occupational Safety and Health.
- Third priority is given to formal employee complaints concerning unsafe or unhealthy working conditions. OSHA maintains confidentiality of the complainant's identity but will inform the complainant of any action taken regarding the complaint.
- Fourth priority is given to program (routine) inspections. These are selected based on factors such as workers' compensation claims or current special emphasis programs.
- Final priority is given to follow up inspections which are done to determine if previously cited violations have been corrected.

**Inspection Process:**

- OSHA investigators are required to present official credentials upon arrival.
- Any request or demand by an OSHA investigator will be handled by the Associate Vice President, Facilities & Public Safety or his/her designee.
- The Associate Vice President, Facilities & Security or his/her designee will communicate to the Kirkwood President as well as the affected Department Head(s) on the details of the inspection.
- In the event an OSHA investigator arrives at any Kirkwood location or department, the Kirkwood employee will escort the OSHA investigator to a conference or meeting room and immediately contact the Associate Vice President, Facilities & Public Safety or his/her designee.
- The Associate Vice President, Facilities & Public Safety or his/her designee will attend and participate in the opening conference, accompany the investigator during the physical inspection and be responsible for all documentation and follow-up reporting requirements.
- Opening Conference:
  - The investigator will explain the purpose of the investigation and intended scope of coverage.
  - The investigator may review required postings, OSHA 300 log, Kirkwood safety plans, all other OSHA-required written safety and health programs and training records.
- The route and duration of the physical inspection will be determined by the investigator and may cover one or more departments or facilities based on the inspection category. The investigator may have private discussions with employees, observe safety and health conditions and practices, take photos, videos and/or instrument readings, examine records, collect air samples, measure noise levels, monitor employee exposure to toxic fumes, gases and dust and survey existing engineering controls.
- Closing Conference:
  - The investigator will discuss unsafe and unhealthful conditions observed and indicate violations for which citations or penalties may be issued. The investigator will discuss possible abatement method and length of time needed for abatements and inform Kirkwood on contestation rights.
  - Kirkwood will receive a Citation and Notification of Penalty by certified mail. As required, this will be posted at or near the place of the violation for 3 days or until the violation is corrected, whichever is longer.
  - Penalties are based on the severity and probability of injury. There are different levels of severity ranging from least serious violations to the most serious. Penalties for violations may be partially credited by depending upon good faith and previous violation history.
- Kirkwood is required to document abatement of each alleged hazard that was not immediately abated at the time of inspection. Reports submitted to OSHA will state specific corrective action taken for each item and the date completed. Additional documentation such as photos, invoices and receipts will be included for serious citations.
- Kirkwood may file a “Notice of Contest” within the appropriate number of calendar days after receiving citations after which an informal conference will be arranged to discuss and determine if a settlement can be negotiated.
- Upon receiving a citation, the hazard must be abated by the date on the citation. Factors beyond Kirkwood’s control such as parts on back order may prevent completion of corrections by the abatement date. If this occurs, this information will be communicated to OSHA in writing.

## References

## Definitions

Term	Definition
Term 1	
Term 2	
Term 3	
Term 4	

## Revision Log

Version Number	Date Approved	Approved by	Brief Description of Change
1	8/12/2014	Tom Kaldenberg, Vice President, Facilities & Security	
2			New template 6/5/2018
3			Procedure template 9/11/2019