

Official websites use .gov A .gov website belongs to an official government organization in the United States. Secure .gov websites use HTTPS A lock ( ) or https:// means you've safely connected to the .gov website. Share sensitive information only on official, secure websites. Disclaimer: Although each Federal and State regulatory agency has its own procedures for handling safety and health audits, the following sections suggest practical ways to prepare for and assist in safety and health inspections. However, NIOSH does not imply that these written suggestions are the only ways to prepare for and assist in safety and health inspections. Although Federal OSHA does not have jurisdiction over State and local government employees, including those in public schools, the 26 States that operate OSHA-approved State plans are required to extend their State standards to these workers (refer to Appendix A, Federal Government Agencies, OSHA State-Plan States). State standards and enforcement are either identical to, or at least as effective as, Federal OSHA. In addition, EPA enforces several OSHA standards, including "hazardous waste operations" (29 CFR 1910.120), in workplaces in the public sector in States without OSHA-approved State plans. The 26 States with OSHA-approved State plans, in addition to enforcement, have extensive voluntary compliance programs, including on-site consultation services available to public sector employers. In States without State plans, although Federal OSHA has no authority to inspect nor enforce standards in public schools, the local OSHA office may be able to provide hazard recognition assistance and technical support. Extensive compliance assistance information is also available on OSHA's Web site and in Federal and State publications. To assure that inspections run smoothly, follow the recommendations outlined here: Both career-technical educational program administrators and enforcing agencies have expressed that they want inspections to be cooperative rather than adversarial events. To do this, inspectors need to be understanding of the obstacles the school faces in controlling hazards and considerate of the time and efforts needed to remediate such hazards. Have an ongoing

environmental safety and health program in place.

Most inspectors are impressed when they see that a school is concerned with a safe environment on a daily basis, not just before or after an inspection. Such programs help schools take a proactive approach to safety. For this reason, it is important that there be an ongoing program and that you make the inspector aware of it. The elements of a good program are described in Chapter 2: How to Establish an Effective Occupational Safety and Health and Environmental Safety Program. Invite the enforcement agencies to do proactive training and education.

Part of an environmental safety and health program involves training and educating key personnel and high-risk employees and students. Take advantage of the enforcement agencies: they all offer free outreach, compliance assistance, and education services; including training and information sessions. They can also supply you with free bulletins, videos, presentations, fact sheets, and other helpful documents. They are often willing to send staff to regional or annual conferences, meetings, or training programs. Have them speak to your school about their inspection procedures or policies and other resources available to you. Use the enforcement agencies' free consultation and technical assistance services before inspections take place.

Take a proactive approach by dealing with problems before you receive a citation. Agencies prefer to help you be proactive with regard to safety, rather than to conduct formal inspections. If there is a suspected violation or hazard, call the appropriate agency's consultation program and ask for help. Many consultation programs are designed to help identify problems and offer solutions for correcting them, as well as offering information about other free resources. Consultation personnel are well-trained safety and health professionals. If an agency is not able to help, ask them to refer you to someone who can. For example, OSHA offers free consultation services in each State. Have designated safety representatives and personnel available at the inspection.

When an inspector arrives, he or she must have access to people with a good overview

of the safety program. It will help to have representatives who are informed and can describe steps that have already been taken to solve problems. Find out the scope of the inspection.

Find out whether the inspection will be broad or specific, who will be interviewed, what locations will be inspected, what records will be reviewed, and what practices will be observed. Ask the inspector what documents would be helpful. Do not be reluctant to ask questions. Notify the appropriate people in your school district about an upcoming inspection.

Enforcement agencies have different protocols for determining contacts. For example, some inspectors may contact only the county superintendent; others may contact the business administrator or the district superintendent. The school must establish their own internal protocol for determining the person to notify for inspections. Make sure that those who want to be involved in the inspections are notified. Having the union representative present is often very helpful for the inspector, and it is required by some regulations because: Schedule the inspection for a convenient time.

Finding an ideal time for an inspection may be difficult, because the inspector often has to observe a class or process in progress. However, most enforcement agencies will be accommodating if the school offers reasonable opportunities for the critical personnel to be present. Aim for a date that is not as busy for the key personnel. Remember that the inspector may need adequate notice to reschedule inspections, especially those that involve numerous parties. Gather necessary documents in advance.

Have appropriate blue prints, purchase orders, organization charts, injury and illness reports and records, material safety data sheets, hazard communication inventories, etc. available for inspection. Have extra copies made in advance. Gather other important information in advance.

In addition to the above documents, gather other useful information before the inspection (for example, the status of obtaining parts or services to correct a problem).

To keep a general inspection focused and to save time, ask a union representative if applicable, or other suitable representative to survey employees for complaints or health symptoms in advance. Arrange for necessary access to equipment or locations. Make sure there is access to areas or equipment that is normally locked or requires security clearance. Have a ladder and flashlight ready. Always have spare hardhats, safety goggles, etc. for people who accompany the inspector. Accept unannounced inspections.

Some agencies are mandated to conduct unannounced inspections (e.g., the Occupational Safety and Health Administration). Immediately notify the appropriate people to participate in the inspection. Have someone meet with the inspector as soon as possible. Be ready to respond to the inspector's questions or comments.

They are made with the intent of identifying and correcting hazards. Explain the chain of command and key responsibilities. Send the appropriate people.

Send someone knowledgeable about the particular hazards being investigated as well as the person responsible for the entire safety program at that site. Explain what actions have already been taken. Present the facts.

Not giving inspectors all the facts will make the case worse. If the school is aware of an existing hazardous condition that was not or could not get corrected, this potentially makes the condition a "willful" violation. Save time by delegating the search for documents and personnel.

Delegate the responsibility of finding and copying records to someone who does not have to attend the inspection. Secure only those documents requested by the inspector. Similarly, have someone else schedule time for the inspector to meet with key individuals (i.e., maintenance personnel, safety officer, teacher). Offer to mail documents or set up telephone interviews if needed. Accompany the inspector on his/her walkthrough.

Have someone, preferably the site safety person, stay with the inspector during the

entire inspection. Also, if the school has one or many unions, it may be appropriate to have a union steward or other employee representative present during the walkthrough. Have that person take notes and pictures as appropriate. Be available.

During the inspection, make sure that you will be available. If the inspectors asks, give out the business cards or names, phone numbers, and titles of key personnel who attended the inspection and those who could not attend. Ask for explanations of citations.

The inspector should be able to give an adequate explanation of why the regulation exists. Ask for the inspector's help in abating a violation.

If the inspector cites the school, ask to help for a feasible solution since they may have seen similar problems corrected. In some cases, the law requires inspectors to provide a feasible solution. Ask them for additional resources and contacts in other career-technical education programs or safety and health organizations that have dealt with similar problems and solutions to those problems. Explain any obstacles that may be faced in trying to correct a problem.

Explain the budget process and time constraints. The inspector may have the flexibility to arrange for convenient abatement deadlines. In some cases, abatement time requirements may need to be discussed with the inspector's supervisor. If necessary, ask the inspector about the procedures for contesting abatement deadlines. If there are problems with the inspection, let the inspector or his/her supervisor know.

If the inspection did not go well, discuss it as soon as possible with the inspector (sometimes there is a lag time between an inspection and a report or citations). In some cases, rights to contesting a citation are lost for not responding quickly.

