



UNIVERSITY OF MINNESOTA

University Health and Safety

Workplace Safety Inspection Program

Effective Date: February 2022

I. PURPOSE

The program is to ensure work spaces at the University of Minnesota (UMN) are maintaining compliance with Federal, state and University of Minnesota requirements. Regular, periodic inspections help to keep all workspaces in compliance with regulatory requirements and safe operating condition by identifying health and safety deficiencies.

The goals of the inspections program are the following:

- Check that personnel and departments are following the University of Minnesota health and Safety Programs
- Verify that personnel and departments are following requirements from Minnesota Occupational Safety and Health Administration (MNOSHA) and other regulatory agencies
- Verify that facilities and equipment are in a safe, code-compliant operating condition
- Ensure that all work activities are conducted in a manner to prevent employee exposure to hazardous chemicals, hazardous biological materials, and unsafe working conditions

II. SCOPE

This program applies to all UMN-owned spaces and facilities, and to all workers (employed or volunteers) in UMN facilities and spaces.

III. DEFINITIONS

Department Safety Officer (DSO) - A department-appointed safety representative who helps answer questions specific to their department/building and who coordinates with University Health and Safety (UHS) staff to perform inspections. Department safety officers are appointed by their parent department and often serve on department/college safety committees.

Deficiency - A safety concern/violation that requires corrective action from the work area.

Informal worksite visits – An unannounced visit by UHS Staff to perform a quick check of a work space or to investigate a safety concern.

Inspection Management System - The software used to record, send, and track inspections. Currently, Workplace Safety does not have a centralized Inspection Management System software, but will be implementing one.

Workplace Inspection - A scheduled inspection coordinated with the departmental supervisor or staff member. A visual inspection is performed to verify key risk control and safety management components in a workspace. Results are entered into the inspection management system and sent to the department supervisor, staff and UHS representatives. Department/college leadership can be copied if requested.

The inspection is considered “open” if there are deficiencies and no response has been received from the department in the inspection management system. The inspection is considered “closed” if there are no deficiencies or if any deficiencies have been corrected and a response has been recorded from the department in the inspection management system.

Safety Consultation - A scheduled visit or phone/web call to discuss safety concerns or UMN safety requirements. These are informational and documented where necessary.

Self-Inspection - Online form with general safety and risk questions sent via UHS. A representative from the work area fills out the form and submits it to UHS within a predetermined amount of time.

UHS Safety Partner – A UHS Workplace Safety or Lab and Research Safety or Specialist who is assigned to a specific college/department/unit to cover their safety inspections and consultations.

IV. RESPONSIBILITIES

Departmental Staff Responsibilities

- Participate in inspections as designated by your Supervisor.
- If present during an inspection, answer questions to the best of your ability.
- Provide documentation of corrective action when requested.

Supervisor (or qualified staff delegate) Responsibilities

- Maintain safety records and ensure that they are available at the time of an inspection.
- Respond to requests for information and inspection scheduling from UHS staff
- Attend or appoint a staff member to attend any in-person visits.
- Respond or appoint a staff member to correct and respond to any inspection deficiencies in the allotted time frame.
- Schedule, coordinate, and attend inspections with UHS safety partners.
- Assist UHS staff in any follow-up items from the inspection.

Department Safety Officer Responsibilities (Research Areas Only)

- Maintain a current list of all labs in their service area.
- Inform UHS safety partners when a lab closes, moves, or if a new lab is starting.
- Distribute communications from UHS safety partners to labs in their service area.
- Schedule, coordinate, and attend inspections between labs and UHS safety partners.
- Provide oversight and guidance during lab inspections to help check regulatory compliance and safety in the lab.
- Assist UHS staff in any follow-up items from the inspection.
- See [DSO Roles and Responsibilities](#) for responsibilities outside of inspections

Department/College Responsibilities

- Assign a supervisor/DSO to each department or service area.
- Inform the supervisor/DSO and UHS safety partner when changes occurring to staffing, how activities, etc. that may change how this program is implemented.
- Review inspection data and incorporate it into department/college safety initiatives and training.
- Assist UHS in escalation procedures for work areas who have egregious safety violations, do not resolve audit deficiencies, and who do not respond to inspection requests.
- Provide funding and dedicate staff time for facility improvements, regulated waste clean outs, and violations.

University Health and Safety Responsibilities

- Maintain the inspection written program and review/update the program at least annually.
- Determine the inspection frequency based upon risk for all workspaces, shops, mechanical rooms, etc. at all UMN locations.
- Assign a Workplace Safety (WPS) service partner to work areas.
- Provide annual summary data to University Services Leadership team and other appropriate leadership committees.
- Coordinate with supervisors/DSOs to schedule and perform inspections.
- Coordinate review of the Workplace Inspection Program annually.
- Track the completion of self-inspections and corrective actions from in-person inspections.
- Maintain the Laboratory Inspection Program by reviewing and updating the program at least annually.

- Create and maintain a current list of machine shop at all UMN locations.
- Upon request, provide summary of inspection data
- Use inspection data to inform UMN-wide safety guidance and initiatives.

V. PROCEDURE

Workplace Hazard Ranking

UHS has developed a Workplace Hazard Ranking (WHR) system for inspections to provide a framework to rank the risk and severity of hazards found within each work area. The main objective of WHR is to present an objective approach to prioritize areas for inspections based on:

- Type and quantities of hazardous materials present
- Physical hazards present in a work environment
- Hazardous operations and equipment
- Engineering controls and procedures
- Specific inspection history and performance

UHS staff will use this ranking system to determine required inspection frequency of work areas and research spaces based on self-inspection answers, processes, etc. A department/college/unit may request more a more frequent inspection cycle and UHS staff will accommodate these requests as we are able. Temporary work areas (e.g. construction sites, project crew work, etc.) can also be inspected using the in-person or self-inspections.

There are 4 WHR classes ranging from the least hazardous (WHR 0) to the most potentially hazardous (WHR 3). The frequency of audits is defined in the table below in Table 1.

Table 1: Hazard Ranking Frequency Based on Workplace Hazards

Workplace Hazard Ranking (WHR)	Hazards Present	Inspection Frequency
WHR 0	Non-hazardous, household products Office based work.	As needed
WHR 1	Minimal quantities of hazardous chemicals (below posting threshold) used for surface cleaning Additional spaces may include storage rooms, support spaces, freezer rooms, and irregularly occupied equipment rooms	In-person every 3 years (36 months) Annual Self-Inspection
WHR 2	Typical chemical work involves small volumes of flammable solvents, acids, and toxic chemicals. “Small volume” defined as at or just over the threshold levels for hazard signage posting. Regularly use, dispense, transfer chemicals with ph of two or less and/or twelve or greater. Only non-reactive gases (e.g. nitrogen, helium, argon etc.) are used. Designated Hot Work locations Shop and fabrication spaces with stationary machinery (millwork, welding, sheet metal, mills, foundry, etc.) or portable power tools.	In-person every 2 years (24 months) Annual Self-Inspection

	Areas with equipment that requires Lockout Tagout procedures, regular removal of guarding, entry into confined spaces.	
	Areas where active fall protection is required to access or used.	
WHR 3	Use of hazardous compressed gases (e.g. flammable, oxidizing, corrosive, toxic, etc.).	1 year (12 months) or more often decided upon by UHS
	Routine use of carcinogens, acutely toxic materials, sensitizers, and reproductive toxins.	
	Class 3B or 4 lasers with controls	May require more regular check-ins for changes in process (Management of Change)
	Work area requires use of respirator or specialized personal protective equipment	
	WHR 1 and 2 groups with previous major accidents, occupational disease, or poor previous audit results may be moved up into this category	

Annual Self Inspection

Certain work areas may be required to conduct an annual self-inspection in their space. Self-inspections are important to annually verify/monitor:

- Safety Programs and training are up to date,
- Work is being performed safely and standard operating procedures are up to date,
- Work areas are in compliance with regulatory requirements,
- Precautions are in place to eliminate or reduce the severity of injuries to people and damage to property and the environment,
- Health and safety responsibilities required of the supervisors, front line staff and management.

The self-inspection should be conducted by knowledgeable and trained personnel and provides any updated information to UHS safety partners. For areas with a large number of spaces (e.g. mechanical rooms), a self-inspection may not be required for all locations each year. The process for completing self-inspections is as follows:

- UHS staff send the electronic Self Inspection Form to departmental contact for distribution.
- The form is filled out within 30 days.

- UHS staff check the results and contact the department contact if they have any questions or concerns.
- The completed “result” is logged into our Inspection Management System.

Workplace Inspection

UHS coordinates with supervisors/DSOs to schedule Workplace Inspections at a frequency appropriate to their WHR. Inspections will be performed in person with personnel present (unless a virtual option is required).

- Annual Self Inspection forms are sent to the workplace contacts.
- UHS coordinates with the supervisor/DSO to schedule an inspection
- Inspection team (e.g. UHS staff, supervisor, and department staff) does a review of documentation and in-person walk through of the work area.
- UHS documents hazards.
- UHS reviews the findings with inspection teams before leaving.
- UHS enters findings in Inspection Management System.
- UHS distributes Workplace Inspection Findings memo and copies all UHS inspectors, the department contact, staff, and other department leadership as requested.
- UHS tracks responses to ensure departments respond within the 30 days of the distribution of the inspection results. See “Failure to Respond to Deficiencies” below for those who do not respond within 30 days.

Informal Worksite Visits

Informal worksite visits (“compliance checks”) may be performed announced or unannounced.

- UHS staff may perform periodic documented compliance observations in work areas.
- UHS staff will document and track observations during informal visits.
- Results are reviewed and communicated to safety committees and management as needed.
- If an egregious safety violation is observed, Workplace Safety will work with staff to make corrections while on site or coordinate an in-person visit to discuss any concerns.

Failure to Respond to Deficiencies

Failure to respond to inspection deficiencies within the 30-day window will result in the following escalation path:

1. A “REMINDER” email will be sent by UHS to the inspection team with a reminder that they are past due for workplace inspection audit response and corrective actions.
2. A “SECOND NOTICE” email will be sent by UHS to the inspection team to remind them of their requirement and to note that failure will result in a notice being sent to their department leadership.
3. A “THIRD NOTICE” email will be sent to the inspection team and department leadership (e.g. the Department Head, Safety Committee Chair, etc.) that the issue needs to be fixed immediately and an in-person follow up may result.
4. If no response is obtained, final consequences must be determined by the department leadership.

Alternate Workplace Inspection Programs

Individual departments may elect to develop their own inspection program under the following conditions:

- Inspection frequencies are consistent with the WHR listed above
- Inspection documentation is readily available upon request
- The program is documented and maintained in partnership with a UHS service partner
- Alternate program has been approved by Department Leadership and UHS Workplace Safety Manager.

VI. REFERENCES

ANSI Z10-2012 Occupational Health and Safety Management Systems [Approach to Establishing Chemical Hazard Levels - American Chemical Society](#)