



## **Risk Identification Analyses and Control - Inspections**

July 2010

### **I PURPOSE**

The intent of the Risk Identification, Analysis, and Control Division (RIAC) Inspection Standard Operating Procedure (SOP) is to explain how the RIAC Division intends to ensure the safety and health of District of Columbia employees, in the workplace. To accomplish this task, RIAC needs to conduct workplace inspections and investigate occupational accidents, illnesses, injuries and fatalities to identify potential and existing risks, determine injury/loss causes, and investigate reports of unsafe work environments. Additionally, RIAC intends to ensure that each Mayoral agency is provided with the guidance necessary to implement an effective occupational safety and health program within the agency, and to inform the DCORM Director on the progress being made through detailed evaluations, reports and studies of agencies' occupational safety and health programs.

### **II SCOPE**

The RIAC Inspection SOP applies to the procedures the DCORM RIAC staff will use to perform occupational safety and health (Title 29, Code of Federal Regulations (CFR) 1910) inspections / assessments for all D.C. agencies under Mayoral jurisdiction.

### **III RESPONSIBILITIES**

The DCORM RIAC Division personnel are responsible for ensuring occupational safety and health (OSH) compliance.

Additional duties are as follows:

- Attend monthly Risk Management Council meetings/ trainings.
- Conduct workplace inspections to identify potential and existing risks and investigate reports of unsafe work environments.
- Investigate occupational accidents, illnesses, injuries and fatalities
- Investigate and develop strategies to mitigate OIG/OSH issues.
- On a quarterly basis, it will be the responsibility of each RIAC staff member to attend one day of training related to occupational safety and health compliance.

### **IV INSPECTION PROCEDURE**

To ensure that all DC Government buildings meet the minimum Occupational Safety and Health requirements, DCORM follows the Code of Federal Regulations, International Fire Code, and Environmental Protection Agency Guidelines. Inspections are conducted with advance notice to Agency Risk Management Representatives. There are, however, special circumstances under which DCORM may not give any advance notice to an Agency. These special circumstances are:

- Imminent danger situations which requires corrections soon as possible.
- Inspections that require special preparation during office hours.



## District Office of Risk Management STANDARD OPERATING PROCEDURES

### Pre-visit Preparation:

Visits will be conducted after appropriate preparations are made. The RIAC Occupational Safety and Health Specialist(s) gather information that determines the scope of the inspection.

An inspection/investigation requires sufficient information prior to the visit to evaluate the systems in place at the workplace.

The information needed includes:

- The type and location of activity
- First reports of injury and/or accident investigation reports.
- Copies of existing safety and health programs

The RIAC Occupational Safety and Health Specialist(s) may conduct research and analyze the data provided by the agency. In addition, the following information should be reviewed prior to the visit:

- Case Files
- References
- Standards/Sampling Methods
- Injury/accident trend analyses

All safety and health rules and practices including the wearing of safety clothing, protective equipment, or other special requirements will be reviewed and observed by the specialist.

The RIAC Occupational Safety and Health Specialist(s) will provide proper D.C. government identification upon arrival at the worksite.

The RIAC Occupational Safety and Health Specialist(s) will state the reason for the visit, and request that the

appropriate person be available for the opening and closing conferences.

The opening conference establishes the purpose, scope of the visit, and its procedures.

The specialist will provide the following information in the opening conference:

- The RIAC/DCORM program is independent of federal OSHA enforcement.
- The complainant name (where visit is based on employee complaint) will remain confidential if requested.
- RIAC Occupational Safety and Health Specialist(s) do not issue citations or propose penalties.
- Employees will be encouraged to participate in the inspections including private interviews with the specialist(s).
- Agency management will be encouraged to involve employees in the inspection and must permit the RIAC Occupational Safety and Health Specialist(s) to conduct random private interviews with employees.

### Walkthrough

The purpose of the walkthrough is to identify actual or potential hazards and safety and health program management system deficiencies.

### Documentation:

Field notes, observations and other written documentation, such as photographs and sketches are part of the record and will be retained in the case file and/or electronic system.



## District Office of Risk Management STANDARD OPERATING PROCEDURES

### Hazard Corrected on the Spot:

If the hazard is corrected “on the spot” the report will reflect so.

### Hazard Correction Assistance:

Specialists will offer general suggestions during the walkthrough on how hazards may be corrected. This information can enable the department/agency to develop acceptable correction methods or to seek other appropriate professional assistance.

### Closing Conference:

This is normally the last phase of any onsite activity. There may be more than one closing conference (safety and health). During this phase, the specialist explains and reviews the following:

- Suggested improvements in workplace management for safety and health.
- Hazards observed, standards violated the classification of hazards, possible solutions, and selection of agreed upon serious hazard correction dates.
- Other sources of hazard correction assistance.
- Recommendations for additional training.
- The content and timetable of the written report.
- The outcome of industrial hygiene sampling analysis, other than direct readings, will be provided at a later date when the results are available where applicable.

- Agency management is not limited to the correction methods suggested by the RIAC Occupational Safety and Health Specialist(s).

Upon mutual agreement between the RIAC Occupational Safety and Health Specialist(s) and site manager, correction dates will be established to eliminate or control the hazard(s). Failure to do so will result in a referral to the Director of Risk Management and to the City Administrator or Office of the Mayor.

Agency management shall receive a final report within 20 working days of the closing conference, provided sampling was not conducted for incidences other than imminent danger. If samples (e.g. air, asbestos, lead, etc...) are taken, the report will be provided immediately after receiving lab results.

## V CLASSIFICATION OF VIOLATION

These classifications constitute the first steps in determining the gravity of the violations. A classification shall be assigned to a hazard according to the most serious injury and/or illness which could reasonably be expected to result from an employee’s exposure as follows:

**Imminent Danger:** Conditions or practices exist in any place of employment which could reasonably be expected to cause death or serious physical harm *immediately* or before the imminence of such danger can be eliminated through the enforcement procedures otherwise provided by the Act. [Typical abatement period: **Immediate**]



## District Office of Risk Management STANDARD OPERATING PROCEDURES

**High Severity:** Death from injury or illness; injuries involving permanent disability; or chronic, irreversible illnesses. [Typical abatement period: **30 days**]

**Medium Severity:** Injuries or temporary, reversible illnesses resulting in hospitalization or a variable but limited period of disability. [Typical abatement period: **60 days**]

**Low Severity:** Injuries or temporary, reversible illnesses not resulting in hospitalization and requiring only minor supportive treatment. [Typical abatement period: **90 days**]

**Minimal Severity:** Other-than-serious violations. Although such violations reflect conditions which have a direct and immediate relationship to the safety and health of employees, the injury or illness most likely to result would probably not cause death or serious physical harm. [Typical abatement period: **120 days**]

### VI FOLLOW-UP INSPECTIONS

#### Follow-up Inspections (Re-inspection)

Follow-up inspections determine whether previously cited violations have been corrected. If the Agency has failed to mitigate the violations, the RIAC Occupational Safety and Health Specialist thru the RIAC Occupational Safety and Health Operations Manager will inform the ARMRs that failure to rectify the violations will be forwarded to the Director, Office of Risk Management who will in turn will forward the “Notification of Failure to Mitigate” to the Agency Director which in most cases depend on the seriousness of the violations.

### VII REFERENCES AND APPLICABLE DOCUMENTS

The RIAC Division’s OSH compliance program operates pursuant to Division 5, Title 32, Chapter 11, of the District of Columbia Official Code, 2001 Edition (D.C. Law 7-186; D.C. Official Code § 32-1101 *et seq.*) and Reorganization Plan No.1 of 2003 for the Office of Risk Management

### VIII MATERIALS AND EQUIPMENT

- DCORM General Industry Inspection Checklist- The checklist includes all general industry standards (Title 29 CFR 1910 (OSHA)) applicable to D.C. government agencies / facilities. New standards may be added as the situation applies.
- Basic personal protective equipment (PPE) (e.g., hard hat, latex gloves, goggles, etc.)- This equipment has already been purchased for RIAC staff.
- Laboratory Analysis Vendor- Samples will be collected and analyzed, as needed, to accurately assess possible workplace hazards.
- D.C. Government Employee Identification- Identification will allow immediate access to all areas of a Mayoral agency’s worksite.

### IX DOCUMENTATION REQUIREMENTS

District Code 32.1113- Recordkeeping and reporting, requires that each employer notify the mayor of an accident or within 24 hours of an accident or occurrence that causes the death of an employee or life threatening injury requiring the hospitalization of an employee. The DC Office of Risk Management will immediately assist the ARMR’s investigation / documentation upon official notification or learning of a fatality or multiple hospitalization occurrences in any other manner. The *DCORM Occupational*



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*Safety and Health Incident Notification Form* (See Attachment A) shall be used to gather as much information as possible and will be backed up with photographs and any necessary measurements.

*Inspection checklist* (see Attachment B), field notes, observations and other written documentation, such as photographs and sketches are part of the record and will be retained in the DCORM RIAC Division case file and/or electronic system. Upon mutual agreement between the specialist and Agency Director, correction dates will be established to eliminate or control the hazard(s). Failure to do so will result in a referral to the Director of Risk Management and to the City Administrator or Office of the Mayor.

Depending on the degree of hazard observed by RIAC staff or reported as an unsafe condition by an employee, different documentation will be used to obtain compliance.

- *Inspection Report* (see Attachment C) – Generally only addresses the findings of a specific investigation based on a report of “unsafe conditions” by an employee. Recommendations within the report which are listed as “Imminent Danger”, “Serious Hazard” or “Other Than Serious Hazard” are given due dates for completion and are followed up on in an effort to gain compliance. A copy of this report will be given to the Agency Risk Manager Representative (ARMR), Building Manager, and DRES ARMR in PDF.
- *District Department of the Environment Complaint Investigation Report* (see Addendum A) - These directives are issued in response to complaint situations that present

immediate danger to life and health, and require immediate abatement by an agency or program. Failure to respond to this directive within the prescribed time period will result in further enforcement action, including re-inspection of a facility and referral of the case to the City Administrator for review and action. In the past, one such Directive shut down the operating facility of a District agency.

- *Tracking DCORM safety inspectors* will use the *RIAC Inspection Tracking Form* to document daily inspections
  - Safety inspections will be entered into the inspections database Remedy within 48 hours of the initial inspection.
  - Complaints will be logged in the RIAC complaint log the same day received

### X SCHEDULING PROCEDURE

#### Priority

Request for RIAC services shall be serviced in the order of worst first, that is, from highest to lowest priority according to the relative hazards of the workplace, the number of employees in the department/agency, loss statistics, employee reports of unsafe conditions and other variables that ensure attention to those areas of highest need from employees and referrals. Response time will be within 5 working days of notification.

#### “Loss Prevention Summary” Reports

By reviewing the *Loss Prevention Summary* of the Disability Compensation report submitted to RIAC staff quarterly, we will be able to zero in on the types of injuries being sustained by each Agency and the repetitive



## District Office of Risk Management STANDARD OPERATING PROCEDURES

nature of those injuries. This will allow us to focus our inspections on agencies / worksites that have the highest frequency of a particular injury and develop mitigation strategies in accordance with OSHA 1910 (29 CFR) General Industry compliance standards.

### **XI FORMS**

Attachment A: District of Columbia Incident/Accident Report Form (SAMPLE)

Attachment B: Occupational Safety and Health Inspection Checklist (SAMPLE)

Attachment C: Occupational Safety and Health Inspection Report (SAMPLE)

Attachment D: RIAC Inspection Tracking Form

Addendum A: District Department of the Environment Complaint Investigation Report (SAMPLE)

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Approved By

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Date