

**HACKETTSTOWN REGIONAL MEDICAL CENTER
ADMINISTRATIVE POLICY MANUAL**

OSHA INSPECTION

Effective Date:	06/1993	Policy No:	AD76
Cross Referenced:		Origin:	Safety
Reviewed Date:	11/08, 01/11	Authority:	Safety Officer
Revised Date:		Page:	1 of 8

I. PURPOSE AND SCOPE

This policy describes the procedures for ensuring timely, professional, and consistent responses to State and Federal OSHA inquiries and compliance inspections. The policy applies to all Hackettstown Regional Medical Center facilities.

II. TELEPHONE INQUIRIES

Anyone receiving a telephone call from State or Federal OSHA shall complete the "REPORT OF OSHA PHONE CONTACT" form in Attachment A of this policy.

- Write down the caller's name, job title, phone number, and the agency they work for.
- Write down the reason for the call.
- Transfer the call to the hospital Safety Officer. If the hospital Safety Officer is unavailable, transfer the call to the Administrator on call. If both the Safety Officer and the Administrator on call are unavailable, tell the caller that a management representative will return their call as soon as reasonably possible.

III. LETTERS, CITATIONS, AND WRITTEN ORDERS

Any written communications received from State or Federal OSHA shall immediately be given to the Safety Officer. This includes written information requests, citations, abatement orders, special orders to correct a hazard, notices of employee complaints, and any other written communications from State or Federal OSHA.

The Safety Officer will consult with Hackettstown Regional Medical Center's legal counsel and appropriate managers and supervisors before responding to such written communications. The Safety Officer will complete the "REPORT OF OSHA LETTER CONTACT" found in Attachment B of this policy.

IV. BUREAU OF LABOR STATISTICS ANNUAL SURVEY FORMS

The Bureau of Labor Statistics (BLS) collects data on occupational injuries and illnesses. BLS has the authority to require an employer to complete an annual survey form using information from the employer's manual OSHA 300 log. These survey forms are sent to selected employers at the start of each calendar year.

Any BLS annual survey forms received by Hackettstown Regional Medical Center's facilities and work locations, shall be immediately sent to Employee Health to ensure they are completed accurately and are submitted within the required deadline.

V. STATE AND FEDERAL OSHA COMPLIANCE INSPECTIONS

**HACKETTSTOWN REGIONAL MEDICAL CENTER
ADMINISTRATIVE POLICY MANUAL**

OSHA INSPECTION

Effective Date:	06/1993	Policy No:	AD76
Cross Referenced:		Origin:	Safety
Reviewed Date:	11/08, 01/11	Authority:	Safety Officer
Revised Date:		Page:	2 of 8

- d. If the inspector plans to perform ambient air monitoring or personal employee exposure monitoring, ask the inspector which sampling and analytic methods are used to perform air monitoring.
 - e. Record the brand name and type of equipment used to conduct any air monitoring or sampling.
 - f. Inquire about the inspector's degree of training regarding the sampling and analytic methods used.
 - g. Record the names of any employees who are present in each work area during air monitoring and those employees who are asked to wear personal sampling pumps for exposure monitoring.
 - h. Ask the inspector for documentation of air monitoring equipment calibration.
 - i. Request copies of any air monitoring results and air sampling analyses.
8. Employee Interviews
- The inspector has the right to question employees in private about health and safety conditions. If the interviews interfere with the employee's work, the inspector must arrange the interview for another time.
- Be sure employees know they are not required to be test subjects or to wear measuring devices if they do not wish to or if it will interfere with their work.
 - Let employees know it's up to them if they want to speak to the inspector. Be sure employees know they may have to testify under oath at a hearing or trial if the hospital gets a violation based on what they say.
9. Correct dangerous conditions immediately, if possible.
- a. Take notes of any alleged dangerous conditions the inspector points out.
 - b. Without admitting there are violations, have them corrected before the inspection is completed, if possible. Photograph the corrected condition.
 - c. Show the inspector the corrected conditions and ask that he report it as such.
 - d. This won't prevent the hospital from getting a violation, but it will qualify the hospital for the "Quick-fix" Program.
 - e. "Quick-fix" Program – any violation corrected before the inspector leaves the site qualifies for a 15 percent reduction in penalty for that violation.
10. Shut down machinery, if requested.

**HACKETTSTOWN REGIONAL MEDICAL CENTER
ADMINISTRATIVE POLICY MANUAL**

OSHA INSPECTION

Effective Date:	06/1993	Policy No:	AD76
Cross Referenced:		Origin:	Safety
Reviewed Date:	11/08, 01/11	Authority:	Safety Officer
Revised Date:		Page:	3 of 8

- If the inspector asks you to, immediately shut down machinery but don't admit anything is wrong with it.
- Complying with request shows a good faith commitment to safety and may qualify hospital for "Quick-fix" Program.

11. Do not conduct demonstrations.

If a piece of machinery or equipment isn't in use and the inspector asks for a demonstration on how it works, do not do so. You are not legally bound to do so. Tell the inspector that hospital policy forbids you to demonstrate the operation of machinery or equipment.

12. Have a closing conference when the inspection is done. The inspector will give you a summary of the inspection results and report any regulations or standards that were violated.

- Use this time to review/clarify alleged violations.
- Correct any incorrect information the inspector may have.
- Do not try to negotiate over violations or penalties.

13. Get statements from employees involved in the inspection. Have employees involved in the inspection write a statement as soon as the inspection is over.

- Statements should cover what they did during the inspection and what was said.
- Keep the written statements with all the information and records you collected during the inspection.

14. Prepare a written report describing the inspection using the "OSHA INSPECTION REPORT" form found in Attachment C of this policy.

15. Submit the report to Hackettstown Regional Medical Center's Risk Management Department or legal counsel within 24 hours after the State or Federal OSHA inspection. All State and Federal OSHA compliance inspections shall be documented on the "OSHA INSPECTION REPORT" form in Attachment C of this policy. Copies of the "OSHA INSPECTION REPORT" shall be sent to the Safety Officer, Site Management, Shift Supervisors, and Hackettstown Regional Medical Center's legal counsel within 24 hours of each inspection.

A. Notification of Company Personnel

The following Hackettstown Regional Medical Center personnel must be notified immediately if a State or Federal OSHA Compliance Officer arrives at a company facility or work location:

- Safety Officer
- Hospital Administration
- HRMC legal counsel, and
- Shift supervisors or managers for any contractors on site at the time of the inspection.

B. Safety Officer and Hospital Administration Responsibilities during OSHA Inspection

**HACKETTSTOWN REGIONAL MEDICAL CENTER
ADMINISTRATIVE POLICY MANUAL**

OSHA INSPECTION

Effective Date:	06/1993	Policy No:	AD76
Cross Referenced:		Origin:	Safety
Reviewed Date:	11/08, 01/11	Authority:	Safety Officer
Revised Date:		Page:	4 of 8

1. Ask for the OSHA Inspector's identification. If there is any question about this identification, call the local State or Federal OSHA office to verify it. Document the name, address and office phone number of each State and Federal OSHA representative on the "OSHA INSPECTION REPORT" form and attach their business cards or a photocopy of other identification.
2. Ask the reason for the inspection by asking about the type of inspection OSHA is conducting.
 - Routine programmed inspection
 - Investigation of a complaint
 - A report of imminent danger
 - Accident investigation

If the inspection is the result of an employee complaint, request a copy of the complaint. OSHA Inspectors generally are not obligated to reveal the complainant's name, but can usually provide a copy of a formal complaint with the complainant's name and identification deleted that describes the alleged violation and the specific work activity involved.

If your request for a copy of the complaint is refused, document this and ask for a description of the alleged violation and the specific work activity involved. Write this description on the "OSHA INSPECTION REPORT."

3. Ask if the inspector has a warrant. If he does, bring it to the Safety Officer. It will state the time limits and ground rules for the inspection.
4. Escort the OSHA Inspector to a private office or meeting room. Tell the inspector that hospital policy requires you to contact the Administrator-on-Call, and if the inspection relates to a contractor or subcontractor, that you are required to notify the appropriate contractor's supervisor or manager as well.

If the inspector refuses to allow you to contact the appropriate personnel, accompany the inspector and have someone else notify the Administrator-on-Call.

5. Have an opening conference. (The hospital is entitled to one.) This can take place in your office or in any available meeting room and prior to any site inspections or visits.
 - Determine what the inspector wants to see/visit.
 - Answer all questions truthfully and objectively.
 - Do not volunteer any information.
 - You have the right to contact other people if you don't know the answer to a question or how to answer the question.

If the inspection is based on a complaint, ask specifics including whether the complaint is from a current employee.

If the complaint involves a specific area of the facility, use the most direct route when escorting the inspector to the area.

**HACKETTSTOWN REGIONAL MEDICAL CENTER
ADMINISTRATIVE POLICY MANUAL**

OSHA INSPECTION

Effective Date:	06/1993	Policy No:	AD76
Cross Referenced:		Origin:	Safety
Reviewed Date:	11/08, 01/11	Authority:	Safety Officer
Revised Date:		Page:	5 of 8

Explain any security procedures and safety rules to the OSHA inspector before any walk-around inspection tours.

Provide personal protective clothing for the inspector if they have the appropriate proof of current training and medical clearance.

6. Records Request

Give the inspector only those records he requests and do not let him go through your files himself. Arrange for inspector to view original reports of incidents and/or accidents that cannot be copied.

a. Consult Hackettstown Regional Medical Center’s legal counsel before giving the OSHA inspector any documents or records to be taken away from the work site.

b. Provide access to Material Safety Data Sheets (MSDS), written safety program and procedures, occupational injury and illness reports, employee exposure monitoring and medical monitoring files, employee training and safety meeting records, and other records related to State or Federal OSHA standards, if requested by the inspector.

c. Do not allow the inspector to remove original documents from the work site. These must be maintained as part of Hackettstown Regional Medical Center’s records.

d. List the files and records examined and those copied for the inspector on the “OSHA INSPECTION REPORT” form found in Attachment C of this policy.

7. Record Keeping

Keep complete records of the inspection. Take notes throughout the inspection of everything that happens. Ask questions of the inspector and record his responses.

If the inspector uses a video camera or takes photos, measurements, air samples or any other tests:

a. Ask what he is doing and why.

b. Take the same photos and measurements as the inspector.

c. Takes photos of the inspector taking measurement or air samples if possible.

**HACKETTSTOWN REGIONAL MEDICAL CENTER
ADMINISTRATIVE POLICY MANUAL**

OSHA INSPECTION

Effective Date:	06/1993	Policy No:	AD76
Cross Referenced:		Origin:	Safety
Reviewed Date:	11/08, 01/11	Authority:	Safety Officer
Revised Date:		Page:	6 of 8

HACKETTSTOWN REGIONAL MEDICAL CENTER

**REPORT OF OSHA
PHONE CONTACT**

ATTACHMENT A

PREPARED AT THE REQUEST OF LEGAL COUNSEL IN ANTICIPATION OF LITIGATION

EMPLOYER NAME: _____ DATE: _____

WORK LOCATION: _____

ADDRESS: _____

NAME AND TITLE OF CALLER: _____

DATE AND TIME OF CALL: _____

NAME OF PERSON RECEIVING THE CALL: _____

SUMMARIZE THE DISCUSSION THAT OCCURRED DURING THIS PHONE CALL
(Attach additional pages, if necessary.)

ACTION REQUIRED: _____

BY WHOM? _____

**HACKETTSTOWN REGIONAL MEDICAL CENTER
ADMINISTRATIVE POLICY MANUAL**

OSHA INSPECTION

Effective Date:	06/1993	Policy No:	AD76
Cross Referenced:		Origin:	Safety
Reviewed Date:	11/08, 01/11	Authority:	Safety Officer
Revised Date:		Page:	7 of 8

HACKETTSTOWN REGIONAL MEDICAL CENTER

OSHA INSPECTION REPORT

DESCRIBE THE WALKAROUND INSPECTION ROUTE:

DESCRIBE COMMENTS MADE DURING WALKAROUND INSPECTION.

IDENTIFY THE NAME AND TITLE OF ANY EMPLOYEES INTERVIEWED BY THE OSHA REPRESENTATIVE.

DESCRIBE THE DISCUSSIONS BETWEEN EACH EMPLOYEE AND THE OSHA REPRESENTATIVE, IF YOU WERE PRESENT DURING THOSE DISCUSSIONS.

DESCRIBE ANY SAMPLES OR MEASUREMENTS TAKEN BY THE OSHA REPRESENTATIVE DURING THE INSPECTION. INCLUDE THE TYPES OF EQUIPMENT USED, SAMPLING USED, SAMPLING METHODS, DATE AND TIME.

DESCRIBE ANY PHOTOS/VIDEOS TAKEN BY THE OSHA REPRESENTATIVE.

DID EMPLOYER DUPLICATE THESE PHOTOS? _____

**HACKETTSTOWN REGIONAL MEDICAL CENTER
ADMINISTRATIVE POLICY MANUAL**

OSHA INSPECTION

Effective Date:	06/1993	Policy No:	AD76
Cross Referenced:		Origin:	Safety
Reviewed Date:	11/08, 01/11	Authority:	Safety Officer
Revised Date:		Page:	8 of 8

HACKETTSTOWN REGIONAL MEDICAL CENTER

**REPORT OF OSHA
PHONE CONTACT**

ATTACHMENT A

PREPARED AT THE REQUEST OF LEGAL COUNSEL IN ANTICIPATION OF LITIGATION

EMPLOYER NAME: _____ DATE: _____

WORK LOCATION: _____

ADDRESS: _____

NAME AND TITLE OF CALLER: _____

DATE AND TIME OF CALL: _____

NAME OF PERSON RECEIVING THE CALL: _____

SUMMARIZE THE DISCUSSION THAT OCCURRED DURING THIS PHONE CALL
(Attach additional pages, if necessary.)

ACTION REQUIRED: _____

BY WHOM? _____