# **U-M Research and Academic Safety Escalation Process**

Applies to all inspection types: LAB, SHOP, BIOSAFETY, LASER

#### HAZARD IDENTIFICATION

STANDARD DEFICIENCY CRITICAL DEFICIENCY

IMMINENT HAZARD

**REPEATS** 

EHS inspector notifies PI of deficiencies with expectation of resolution within 30 days.

# Day 30

EHS inspector notifies
Department Chair
and PI at
Day 30.

## Day 60

RASC sends notice to SAL(s), USCC requesting plan to resolve deficiencies within

15 days of notice.

## **Day 75**

Escalation to ELT if needed.

EHS inspector notifies
PI and Department
Chair of deficiencies
with expectation of
resolution within
2 days.

#### Day 2

EHS inspector reports unresolved issues to EHS Director, SAL(s), USCC, and PI at <u>Day 2</u>.

EHS Director/RASC Chair to meet with SAL/USCC.

Escalation to ELT if needed.

EHS inspector
notifies EHS
Director. PI/Dept
asked to suspend
operation/area
usage/relevant
activity. EHS Director
confirms with SAL
that this is in place.

Activity is suspended until corrective actions are deemed sufficient by EHS.

EHS reports the issue to RASC at next meeting.

Items that were noted in the previous inspection report are automatically flagged as repeats.

EHS notifies PI through normal process. (See STANDARD/CRITICAL DEFICIENCY processes.)

#### + AND

If there are 3 or more repeat

items in the same inspection, RASC issues a letter to Department Chair, SAL(s), and USCC.

Legend

: If Unresolved

Acronym

CHP Chemical Hygiene Plan
EHS Environment, Health & Safety
ELT Executive Leadership Team
LTCA Long Term Corrective Action
Pl Principal Investigator / Lab Director /

Supervisor

RASC Research & Academic Safety Committee
SAL Safety Accountability Leads
USCC Unit Safety Committee Chairs

U-M Research and Academic Safety Escalation Process I Revised: 1/14/2025

#### REPEAT BACKGROUND INFORMATION

- Items will be flagged as repeats per the following criteria.
  - (A) Same Inspection Type
  - (B) Same PI
  - (C) Same Deficiency Code
- Inspection Cycle

Comparison between the current inspection and the previous inspection.

- How repeat items are counted:
  - (1) Each item counts as separate item even if they are same deficiency.
  - (2) LTCA (Long Term Corrective Action) deficiencies are not counted as repeat items.

For instance, Inspection # 00001 (Professor A) has 6 different repeat items that were found in the previous inspection cycle (Table 1). Two "Poor housekeeping (GEN10)" deficiencies are counted as two repeat items since the locations are different. Table 2 shows that this Unit (College A) has **2 Pls** who have **3 or more repeat items**.

Table 1: Repeat Report - College A

Insp. #	Туре	PI	Code	Deficiency	Insp. Date	Location	Repeat Items
00001	LAB	Professor A	CHP03	CHP: Requires annual review	1/1/2024	1000 /Building A	
00001	LAB	Professor A	HAZ07	Waste labels incomplete	1/1/2024	1000A / Building A	
00001	LAB	Professor A	GAS11	Gas Cylinder: Inappropriate securing method	1/1/2024	1001 / Building A	6
00001	LAB	Professor A	GEN10	Poor housekeeping	1/1/2024	1003 / Building A	6
00001	LAB	Professor A	GEN10	Poor housekeeping	1/1/2024	1004B / Building B	
00001	LAB	Professor A	PPE13	Disposable gloves reused	1/1/2024	1005 / Building B	
00002	LAB	Professor B	EYE04	Eyewash: Access blocked	1/2/2024	2000A / Building E	
00002	LAB	Professor B	GAS11	Gas Cylinder: Inappropriate securing method	1/2/2024	2001 / Building E	3
00002	LAB	Professor B	CHP03	CHP: Requires annual review	1/2/2024	2002 / Building F	

Table 2: Repeat Items Summary – College A

PIs >3 Repeat Items	Repeat Items
Professor A	6
Professor B	3