

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 AVP, SAL(s), USCC, and PI at **Day 2.**

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

Escalation to ELT if needed.

EHS inspector notifies EHS AVP. PI/Dept asked to suspend operation/area usage/relevant activity. EHS AVP 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

AVP	Assistant Vice President
CHP	Chemical Hygiene Plan
EHS	Environment, Health & Safety
ELT	Executive Leadership Team
LTCA	Long Term Corrective Action
PI	Principal Investigator / Lab Director / Supervisor
RASC	Research & Academic Safety Committee
SAL	Safety Accountability Leads
USCC	Unit Safety Committee Chairs

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 PIs** who have **3 or more repeat items**.

Table 1: Repeat Report – College A

Insp. #	Type	PI	Code	Deficiency	Insp. Date	Location	Repeat Items
00001	LAB	Professor A	CHP03	CHP: Requires annual review	1/1/2024	1000 / Building A	6
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	
00001	LAB	Professor A	GEN10	Poor housekeeping	1/1/2024	1003 / Building A	
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	3
00002	LAB	Professor B	GAS11	Gas Cylinder: Inappropriate securing method	1/2/2024	2001 / Building E	
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