

# LONGWOOD UNIVERSITY

Office of Environmental, Occupational Health, Safety and Emergency Management  
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Date Policy Issued:	Contact/Subject Matter Expert:	Procedure Owner/Approver:
August 1, 2009	Environmental, Occupational Health, Safety, and Emergency Management Office (EHS&EM)	Director, EHS & EM Office / Vice President of Administration and Finance
Effective Date of Policy:	Supersedes:	Governing Principle:
August 1, 2009	N/A	Environmental, Occupational Health, Safety, and Emergency Management Principle

**What is the purpose of this procedure?**

The purpose is to establish a procedure for an orderly response that protects the interests of Longwood University and provides for appropriate cooperation for all involved. Examples of regulatory agency visits, investigations, or requests for information that are subject to this procedure are agent/inspector/compliance officers of any Regulatory Agency (e.g, Occupational Health and Safety Administration (OSHA), Virginia Department of Environmental Quality (DEQ), Environmental Protection Agency (EPA), Virginia Fire Marshall Office (SFMO) or other compliance agency/departments that may arrive unannounced.

**Does this procedure apply to me?**

This procedure provides guidance to all faculty and staff to ensure the appropriate leadership within Longwood University to answer and provide appropriate information requested by a regulatory agency.

**What are the terms I should be familiar with?**

**1. Designated Representative**

Any Longwood University management/department head responsible for the area the Compliance Officer is inspecting or requesting information about.

**2. Environmental, Health, Safety and Emergency Management (EHS&EM)**

Provides comprehensive and standardized environmental, health, safety and emergency management systems, processes, and services to Longwood University.

**What topics are addressed in this policy?**

Identifying  
Reporting  
Communication

### ***Procedure Elements***

**What does this policy require of me?**

All Longwood faculty and staff shall immediately upon identifying any inspector/compliance officer of any regulatory agency notify the EHS&EM Office and their supervisor.

#### **1.0 Identity**

All Longwood University faculty and staff upon identifying or being advised by the person that they are an inspector/compliance officer of a regulatory agency shall ask to see the regulatory officials identification and business card for name and agency affiliation. If contact is by telephone, ask the caller to fax a business card or other identification. Ask for the regulatory officials agency name and phone number and call him/her back to verify identity. After being shown or verifying/receiving their identification, contact shall be made immediately to the EHS&EM Office and their supervisor.

NOTE: If the Regulatory Official cannot provide his/her Agency's Identification Card advise him/her to wait in the Conference or waiting room until a Supervisor can be contacted.

**1.1** The inspector/compliance officer shall be directed to a conference area or waiting area until a supervisor can be reached.

**1.2** The supervisor shall make contact with the inspector/compliance officer determine the area the inspector/compliance officer is needing to review and contact the Director of that department.

**1.3** The Director or his/her designee shall lead the Inspector/compliance officer through the inspection until completed.

#### **2.0 Reporting**

The Director or his/her designee and the area supervisor shall take notes of all conversation, request made by the inspector/compliance officer photographs, and record all findings. All information shall be provided to the EHS&EM Office and filed with any citations that are received by the

regulatory agency.

### 3.0 Communication

- a. During the visit, the regulatory agency official(s) shall be escorted at all times by an individual who is knowledgeable about the area(s) visited.
  1. The inspector/compliance officer will provide their own necessary Personal Protective Equipment (PPE) they will need to enter the areas that are required to wear it. The regulatory official shall be asked if he has the appropriate PPE.
- b. Regulatory agency compliance officers are permitted pursuant to state or federal law, to request copies of documents to assess compliance in regards to what they are inspecting, e.g., OSHA 300 Forms, DEQ Permits, Training Documentation or documentation required by the compliance standards or laws.
  1. All documentation provided to a regulatory agency official shall be approved by the Director of the department or their designee. Personal information such as SSN numbers or personal phone numbers can be blanked out of the report.
- c. Inspectors/Compliance Officers shall be requested to provide an overview of his findings during the inspection and at the end of his inspection/audit. The supervisor of the department shall make specific notes of the Inspectors/Compliance Officers findings and immediately assign work orders for corrective actions immediately at the close of the meeting.
- d. All serious or life threatening discoveries shall be immediately stopped/abated at the site until corrective action can be determined and corrected.

### 4.0 Interviews

In accordance with the state and federal compliance standards Longwood employees can be interviewed by the inspector/compliance officer pursuant to the requirements of their investigation. All Longwood employees have a right to refuse the interview or to accept the interview. When responding to questions asked by regulatory officials employees shall be truthful in regards to facts if known. If the employee does not recall something or has no knowledge about the subject matter, they need to say so. Employees should never guess or speculate on an answer where facts are not known. They are to answer questions carefully, completely, accurately, and concisely so that there will be no

misunderstanding. Any employee may request that his supervisor, manager or Director to be present during the interview.

**5.0 Debriefing**

**Are there specific responsibilities identified within this policy?**

After the departure of the inspector/compliance officer all involved Longwood personnel shall take part in a debriefing with EHS&EM and the manager/Directors of the effected departments. A preliminary report shall be developed by the EHS&EM Office, reviewed with the departments Director and together discuss with the effected Vice President. The Vice President with EHS&EM shall make the necessary notification to the University’s President when applicable.

**Closing**

**Identify** - Who the Regulatory Official is by Official ID.

**Notify** - Supervisor and EHS&EM – Supervisor notifies Director of Department involved.

**Communicate** – Information to Regulatory Official as requested.

**Report** - Findings to Vice President of Department

**Revision History:**

**Revision No.**  
**Change**

**Issue Date**

**Description of**

February 17, 2010



