

 Environment, Health & Safety Office Administrative Procedures	Procedure #: EHS-04-014
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TITLE: EHS Office Program Compliance Review	Approved: Title: <i>Louis DiBerardinis</i> <hr/> Director, EHS
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Goal: To internally review EH&S programs for compliance with regulatory requirements and to ensure they promote the health and safety of the MIT community and protect the environment in the most efficient manner possible.

Action Steps:

Establishing the Review Schedule

The Deputy Director for each EHS Program (i.e. safety, industrial hygiene, radiation, biosafety, environmental) ranks programs to be reviewed based on:

1. Health and safety risk to the MIT community or environment
2. Anticipated regulatory agency targeting
3. Applicability of program to the MIT community (# people covered by the program)
4. Dissatisfaction of the MIT community with some aspects of the program
5. Change in responsibility or scope for program implementation

Based on these considerations, programs are categorized into 3 levels by the EHS senior managers.

Level 1: Priority review - Programs are reviewed at least every three years

Level 2: Secondary review- Programs are reviewed at least every five years

Level 3: Tertiary review - Programs are reviewed on an as needed basis as decided by senior level managers, no regularly scheduled review

At a minimum at least one review will be conducted by each Program annually.

Internal Peer Review Process

1. The Deputy Director of the responsible office assigns an Officer in the program or another EHS program with the permission of that Deputy Director to review. This review must be completed in six months.
2. The reviewer assesses the applicable regulations and other relevant data (i.e. OSHA's Field Operations Manual, commercially available audit guides) and develops a regulatory and administrative compliance checklist.

3. The reviewer meets with the responsible program manager and other relevant persons (i.e. other EHS staff or clients) and reviews the relevant records.
4. The reviewer drafts a program compliance summary, which lists corrective action items, if needed, and program improvement suggestions. The reviewer shall work collaboratively with the responsible program manager to assure that the draft compliance summary is accurate.
and reflects proper regulatory interpretations.
5. Once the program compliance summary and corrective action items are agreed to by the reviewer and the responsible program manager, the summary is forwarded to the Deputy Director. The reviewer's role is finished at this point.

Follow-up Actions

1. Within 3 months the program manager furnishes his or her Deputy Director with an update on corrective actions.
2. Quarterly updates continue until all deficiencies have been addressed. (Note: Deputy Director may accelerate this schedule for critical deficiencies)
3. The Deputy Director submits the report to the EHS Office Director summarizing the results and status of Program Compliance Review.