How to Prepare for an OSHA Inspection!

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Is Your Safety House In Order?

Goals
• Why you should care
• What to expect should OSHA come knocking
• How to prepare for an inspection
Why Should I Care?

- OSHA enforcement is at historic levels
- More inspections and significant cases
- Nursing Home National Emphasis Program is here to stay . . . .

The Elements Of An OSHA Inspection

- The Knock At The Door
- The Opening Conference
- The Walkaround
- The Closing Conference
The Knock And Opening Conference

• No advance notice
• Present credentials
• The CSHO will first conduct an opening conference. During the opening conference, the CSHO will:
  – Describe the purpose of the inspection
  – If the facility is a union facility, the compliance officer may request that an employee representative participate in the opening conference
  – Outline in general terms the scope of the inspection, including the need for private employee interviews, physical inspection of the workplace and records, etc.
  – Review personal protective equipment (PPE) hazard assessment
  – Review OSHA 300 Logs and 300A summary forms

The Walkaround

• The scope will depend upon the nature and purpose of the inspection. OSHA may have authority to perform a comprehensive inspection, which may involve a full facility walkaround, along with hygiene sampling.
• The compliance officer is permitted to take photographs or videotapes whenever the compliance officer determines that it is necessary to do so. Any photographs or videotapes taken by the compliance officer should be replicated by the company.
• During the walkaround, the compliance officer may recommend that certain alleged hazards be corrected and suggest possible means of correction.
• An employee representative must be given the opportunity to accompany the CSHO in the physical inspection of the plant.
Manager And Employee Interviews

- In the course of the inspection, the compliance officer may wish to interview management representatives and other employees.
- The CSHO has the right to interview non-management employees, but not management employees, in private.
- If it would unduly hinder production for an employee to leave his/her post to be interviewed, management can request the CSHO schedule an alternative time to interview the employee.

Closing Conference

- Upon completion of the inspection, the CSHO will conduct a closing conference. Typically, the compliance officer will not indicate how the proposed violations will be characterized (serious, other than serious, etc.) or the proposed penalty amounts.
- At the closing conference, management should:
  - Bring to the CSHO’s attention any information regarding conditions in the plant that will present the company in a favorable light and, in particular, any information that has not previously been brought to the CSHO’s attention.
  - Take detailed notes.
  - Ask the CSHO what the characterization of the citations will be and the proposed penalty amounts. (As noted above, the CSHO will likely not provide this information. Even so, the company representative should attempt to ascertain this information.)
  - Discuss with the CSHO how much time the company will need to make any necessary corrections or repairs of violations that the inspection turned up.
How To Prepare?

• Know the NEP inside and out and how your facility is situated
• Focus on ergonomics, bloodborne pathogens, hazard communication
• Company process and training for preparing for an OSHA inspection

Corporate Philosophy And Training

• Develop written SOP for handling inspection
  – Who will interface with OSHA
  – Where will the opening conference take place
  – Who will follow the inspector around the facility
  – Where will employee interviews take place
  – Who must be notified in the event of an inspection
• Make sure appropriate people are trained in the process
Thank You!

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