

## That Knock on the Door: OSHA or Opportunity?

By Jonathan A. Jacobi, MS, CSP, CHST – Senior EHS Manager, PureSafety

Immediately after the new White House administration took over, many safety and health professionals were wondering, “What’s going to change at OSHA?” But the question lately is, “What isn’t going to change at OSHA?”

OSHA is moving purposefully with new standard development activities related to combustible dust, confined spaces in construction, and workplace exposure to diacetyl flavoring. Existing standards on cranes and derricks and hazard communication are being revised. According to Acting Assistant Secretary of Labor Jordan Barab, standards for workplace ergonomics and safety and health programs will also be considered for 2011 or 2012.

More than 150 new compliance officers are slated for 2010 and OSHA’s enforcement budget is being increased by \$25.5 million. Translation: Thousands more compliance visits. All things being equal, more citations will be issued. And under the new administration, penalties are tougher than ever.

Already this year, a dozen or more worksites have received fines in excess of \$100,000. If enacted, amendments to the OSH Act proposed in H.R. 2067: Protecting America’s Workers Act will further increase civil penalties and mandate criminal penalties for certain violators.

OSHA inspections are a very real possibility for the 13,500 facilities that received a high-rate letter in April and for sites covered by emphasis programs. And sites with good safety records, even sites participating in OSHA’s Voluntary Protection Program, will not be shielded from additional scrutiny. One sign of the new OSHA’s more broadly “skeptical” stance, for example, is a warning that the General Duty Clause may be invoked to address policies and incentive programs that OSHA believes can lead to underreporting (prizes for fewest injuries, etc).

## Get Prepared, Get Empowered – And Improve More than Your Inspection Experience

While OSHA’s Field Operations Manual was revised this year, the inspection process remains largely unchanged. Compliance visits begin with a presentation of credentials, followed by an opening conference, then a review of records which can influence the overall scope of the walkaround inspection. Decentralized, paper-based approaches to safety and health can easily lead to a worst-case scenario: unsatisfied with the records review, compliance officers decide they’re justified in probing every detail of your program. Conversely, if you present clean, complete documentation, you show the inspector that everything is in order at your facility, which can lead to a less intrusive inspection.

By centralizing and streamlining safety and health management efforts, including simplifying critical tracking and reporting tasks, PureSafety solutions greatly enhance your ability to prepare yourself, your team and your programs for OSHA scrutiny. In many cases, the added technology power will help you go beyond the minimums required by law – which can make a lasting positive impression with inspectors. Just as importantly in these budget-sensitive times, leveraging the full power of PureSafety’s software and information solutions can help improve efficiency and effectiveness enterprise-wide, improve business performance, and most importantly, keep your people safe, healthy and on the job.

## That Knock on the Door: OSHA or Opportunity?

By Jonathan A. Jacobi, MS, CSP, CHST – Senior EHS Manager, PureSafety

Here are a few key benefits of working with PureSafety to help prepare for the new OSHA:

- **Compliance** – Educate your leadership team, safety committee members, front lobby receptionist and anyone likely to interface with compliance officers. Make sure they know what to expect and what compliance officers will expect in turn.
- **Risk Management** – Strengthen your injury/illness recordkeeping, investigation, and reporting process and document all actions taken to mitigate risk.
- **Corporate Governance** – At a minimum, OSHA will ask to see documented programs for hazard communication, lockout/tagout, emergency evacuation, and personal protective equipment. Prove compliance with training records and records of hazard assessments you used to determine PPE needs (these may take the form of a Job Hazard Analysis).
- **Culture** – Make OSHA compliance and incident prevention paramount. Educate your workforce about hazards and precautions and get them involved in health and safety efforts. Grow a vigilant, empowered team of inside consultants standing guard 24-7.
- **Reputation** – Reduce safety and health incidents that bring negative publicity – and the attention of regulators.

If you're making the case for investing in our solutions, be sure to emphasize one more benefit: **Profitability**, through reduced training costs of up to 50%, streamlined internal IT processes, and lower total cost of incidents, injuries and absences. From the new OSHA to the new economic realities organizations face, there has never been a more critical time to maximize safety, health, efficiency and profitability. PureSafety's comprehensive solutions for training, safety, occupational health and medical management consistently deliver results in each of those areas. Get us on your team, so when OSHA knocks, you can open the door with confidence.

Jonathan A. Jacobi, MS, CSP, CHST is Senior EHS Manager at PureSafety headquarters in Nashville, Tennessee.