

A Certified Safety Specialist Reveals How You Can Take the Stress Out of an OSHA Audit

As a business owner, an audit from the Occupational Safety and Health Administration (OSHA) is likely the last thing you want on your plate. With over seven million workplaces on its watch list, it's likely that OSHA will find its way to you eventually—often without advanced notice. While the uncertainty can cause anxiety, Amy Knight, a QSSP-certified Safety Specialist at Airgas, reveals what to expect and how to be well prepared.

Who Gets Inspected

Knight points out there are many reasons workplaces get inspected—all in the name of safety. Since OSHA doesn't have the resources to check out every facility annually, the Agency has established criteria for ensuring the highest priority companies undergo inspection first. Often, industries with a history of being labeled "high-hazard" are also included on the priority list.

Common benchmarks include:

- Imminent danger situations
- Workplaces with high numbers of injuries, illnesses or employee complaints
- Referrals from other agencies, such as the EPA

Not all inspections warrant an appearance: High-priority situations involving employee injuries and complaints tend to warrant a visit but many inquiries are not carried out onsite. Instead, OSHA will communicate its concerns to an employer via telephone or fax. If the company responds in a timely manner (usually five business days), OSHA generally will not visit.

Be Prepared

Preparing your staff can be just as important as preparing your facility. It's always a best practice to ensure all employees are up on their safety protocols, but you should also make them aware of company procedures when it comes to interacting with regulatory personnel.

Preparation can mean many things, but in this case, the best path is to be proactive. Prior to showing up, OSHA personnel tend to gather a fair amount of background information on the company. Compliance Safety and Health Officers (CSHOs) are able to utilize third-party data to find out how many employees work at your facility, the number of prior citations and the site's overall injury rate before they even show up. In all likelihood, the inspector has done his homework, so too should you.

Since records review is pretty much a given when it comes to any OSHA inspection, if you haven't streamlined your records retention process already, now is a good time to start. Ensure your company retains the proper records and that they are easily accessible to avoid raising any eyebrows. Employers should also consistently review this information to make sure everything is accurate and up-to-date.

“[Prepared companies] want to be proactive,” says Knight. “You’ll want to have about three to five years of OSHA logs saved up. Be ready to show those along with training records and any inspections you have to do regularly. If you tell a CSHO that you need time to produce additional information, it will likely reflect poorly on your site.”

Every employee needs to know where the safety policies are located. One item the inspector will likely ask to see is the location of the OSHA “Job Safety and Health” poster, as they require this mandate to be prominently displayed in an employee-accessible area. There’s really no excuse for violating this mandate, as the poster is available [on the website](#) for free (and we all love free things).

Cover Your Bases

You never know how many officers will participate in your inspection, but once the inspection team has arrived, it's time for the “opening conference.” It’s ideal for the company to have a designated space for this, preferably somewhere private and quiet, with ample seating and telephone access. Compliance officers should state the reason for their visit, and employers are expected to have a company representative available. In some cases, you may also need to appoint an employee representative.

Walk Tall

No one likes to be put under a microscope, but it’s in everyone’s best interest to be cooperative and avoid any defensive stances. After the conference, a walkthrough of the site typically occurs, allowing the investigator to take a look at the facility and, sometimes, even speak with the employees. Make sure any staff interviews are held in a separate area away from the work space.

Always provide whatever material is requested, but be mindful of oversharing, as it can lead to an additional inquiry.

“After the opening conference, take them directly to where they need to be,” advises Knight. “Don’t zig-zag through any other areas they don’t need to be in because it does open you up to more questions. Take them directly to the issue and take them directly back in the quickest path possible.”

During the walkthrough, they will take note of any potential health or safety hazards, and may further document with a photograph or sample. It’s a best practice to observe the inspector on site, documenting his activities and what things he examines.

If the reason for the visit was fairly limited in scope, your inspection may wrap up the same day as the opening conference. It’s common, however, for more complex investigations to last longer. During the closing conference, the CSHO will summarize all notes, findings and violations, as well as provide more information on [employer outreach programs](#), which are offered at no cost. While the inspector can give recommendations as to whether you should receive any citations, he cannot issue them—these will come from your OSHA Area Director.

In the event a citation is eventually issued, they will provide a proposed fine and deadline for hazard correction. If you want to discuss the issue or proposed penalties further, employers have the option to participate in a conference with their area director. You also have 15 business days

to contest violations in writing.

Ace Your Next Inspection

Expert safety training helps employers avoid lost time and costly fines and ensures everyone gets home safely at the end of the day. Consider implementing regular safety training so you can be confident in your employees' ability to protect themselves from workplace hazards.

Knight mentions, "When you educate the employees, you get better compliance. If you value your employees, you will make sure your safety training is continuous throughout the year, whether it's an in-depth class or a five-minute 'tool box talk' during the day."

Knight also advises employers to "Visit [OSHA's website](#) and take a look at the Top 10 most-cited standards. Education is going to be a huge piece to the success of any safety program. You have to be a continuous student of safety or you risk falling behind."