

The Occupational Safety and Health Administration's (OSHA) mission is to ensure the health and safety of American workers. Enforcement plays an important role in the agencies efforts to reduce workplace injury, illness and fatalities.

OSHA recently announced that it will be highly focused on their review efforts directed at general medical and surgical hospitals, psychiatric and substance abuse hospitals, and skilled nursing and assisted living facilities that provide care to or handle COVID-19 patients. This initiative is believed to be in effect through mid-June 2022 to ensure these facilities have taken the necessary steps to protect their workers from the hazards of COVID19. OSHA refers to this type of on-site inspection is called a targeted inspection.

When an OSHA inspector enters our building reception or security staff should welcome them, ask them to sign in and follow appropriate COVID protocols for visitors including temperature check and receiving a sticker, and seat them in a conference room, office or lobby near the entrance of the building.

The Administrator and HR should meet with the inspector in a private space close to the entrance of the building. Typically these are the steps that will follow.

Opening Conference:

- ERS will ask the inspector to present their credentials.
- OSHA Inspector will explain why OSHA is inspecting the workplace.
- OSHA Inspector will describe the scope of the inspection.
- OSHA Inspector will discuss the "walk around" procedure and outline areas of the workplace they would like to see.
- OSHA will discuss any need for worker and/or manager interviews.
- OSHA Inspector may request policies/documents for their review such as the OSHA 300 log, PPE, COVID screening procedure, PPE fit test, lockout/tag out, haz com policy, personal protective equipment policy, and emergency evacuation policy.

Walk Around Inspection:

- Once OSHA is in the building the investigation has begun. Anything they see in plain sight, they have the right to ask about. Minimizing their exposure is best.
- OSHA Inspector should be accompanied by Administrator and HR throughout the inspection. ERS will determine the path to escort the Inspector to the area(s) of inspection. For example, if they want to see the MPL laundry room, we might walked them out the front entrance and around the building to enter though the dock door.
- If OSHA Inspector takes photos, they will not share these with us. Make sure to have a phone or camera with you and take pictures of whatever they do.
- OSHA Inspector may ask staff to meet privately. Staff can deny this request or request to have someone with them during the interview. Common questions include:

- How long have you worked at ERS?
 - Have you or anyone you know been injured or had a close call on the job?
 - Does ERS provide PPE?
 - Does ERS provide training on PPE and workplace safety?
 - What is the training composed of?
 - Is there anything you would change to make working conditions at ERS safer?
- When inspection is complete. Escort OSHA inspector into to a private office or room for closing meeting. When finished, walk them out the nearest exit.

Closing Conference:

- OSHA Inspector should open this to others within ERS (ie. VP or CEO).
- OSHA Inspector will discuss any findings, possible corrective procedures and reasonable time frames for corrections.
- OSHA Inspector will discuss courses of action ERS may take during inspection process as well as available consultative services provided by OSHA.

Following the Inspection:

- OSHA Inspector will put together a written report outlining the findings, discussions, and any apparent violations. This will be send to the area OSHA Supervisor to determine whether or not any citations should be issued.
- ERS will receive the final written report.
- If a citation is issued, ERS has 15 days to take action, such as:
 - Request a conference with the area OSHA Supervisor to discuss issues, penalties or contest the findings
 - Put in place OSHA's recommendation such as, correct process, train staff, etc.

Insert Contacts Here: