2016 Wisconsin Safety Council Conference and Expo

Wednesday, May 18

Beyond OSHA: Tips from former OSHA Compliance Officers

LINDA HUSKE, SAFETY & TRAINING COORDINATOR, CITY OF WEST ALLIS
TODD W. LOUSHINE, ASSOCIATE PROFESSOR, UW-WHITEWATER

Overview

- Describe Linda's and Todd's career paths
- What we learned after leaving OSHA
- What CSHOs are trained to do
- Anatomy of a compliance audit
- Handling citations and contestation
- Question and Answer session

Disclaimer: The opinions of the presenters do not represent OSHA or its representatives. The purpose of this session is to appreciate OSHA compliance but to focus on going beyond it.

Career Paths – How did we get here?

- **Linda**
  - Initially was going to teach Driver's Ed and History
  - Double up major in junior year to include Industrial Safety
  - Learned about OSHA on 1st job due to an inspection
  - "Nailed" the OSHA way when I joined the organization
  - After being in private industry, now back in the public sector

- **Todd**
  - Initially intended to enter environmental field
  - Learned OSH in training sessions, mentoring, and in the field
  - Acted "too bold" in the beginning, but started listening to employees/employers
  - Worked for a year in sales (1998) and returned to OSHA (honestly enjoyed it)
  - Went to graduate school, mentored to become a scientist/researcher/teacher
Lessons learned after OSHA
- Know your rights (don’t be bullied by OSHA)
- Be prepared for an inspection (have a plan in place)
- Don’t practice safety just to be compliant with OSHA
- Align the safety program with company/org goals
- Occupational safety and health practitioners have a lot to offer their employer beyond a safety program

CSCO Training – Know Thy Enemy
- Compliance officers due hours of research prior to going on compliant and planned-programmed inspections
- CSHOs actually enjoy reading and interpreting the CFR
- CSHOs use the Field Operations Manual (once called the desktop ref)
- Supervisors in the office review all documentation to ensure consistency of citations (based on evidence submitted by CSHO)
- CSHOs are provided continuous training and interpretations/guides from federal OSHA
- CSHOs suffer from being human, just like anyone else

Anatomy of an OSHA Inspection
- CSHO enters workplace, shows credentials, and requests person in charge of safety
- Opening Conference
  - Request labor representation
  - Review 300 logs, programs
  - Review rights and elements of inspection
- Walk-Around (hazard identification/documentation, employee interviews)
- Closing Conference
  - Review findings, discuss potential citations and abatement
Handling Citations & Contestation

- Make sure if you need an extension you apply for it. Do not miss the date for asking for the extension, it can be denied if you do.
- Post the citations where employees can see them.
- ALWAYS contest the citations!
- Be prepared when you attend the informal hearing (have receipts to prove you paid for abatement i.e. hired an electrician), then ask for fines to be reduced by that amount.
- Ask the OSHA staff how to abate a citation. If they can’t tell you how to abate it, they technically can not cite it.

Questions and Answers

- We want to hear from you!
- What would you like to know from us?