

OSHA On-Site Consultation Program

The Occupational Safety and Health Administration (OSHA) wants to assist small and medium-sized businesses with their compliance and safety initiatives through their On-Site Consultation Service. This program offers confidential advice in all states across the country, with priority given to high-hazard worksites. Consultation services are totally separate from enforcement and do not result in penalties or citations.

Program Information

Using a free consultation service largely funded by OSHA, employers can find out about potential hazards at their worksites, improve their occupational safety and health management systems and even qualify for a one-year exemption from routine OSHA inspections. The service is delivered by state governments using well-trained professional staff. Most consultations take place on-site, though limited services away from the worksite are also available. This safety and health consultation program is completely separate from the OSHA inspection effort presently in place. In addition, no citations are issued or penalties proposed during the consultation appointment.

Beyond that, the program is confidential, too. Your name, your firm's name and any information that you provide about your workplace, plus any unsafe or unhealthful working conditions that the consultant uncovers, will not be reported routinely to the OSHA inspection staff. Your only obligation will be to commit the organization to correcting serious job safety and health hazards; a commitment which you are expected to make prior to the actual visit, and carry out in a timely manner.

Benefits of On-Site Consultation

Knowledge of your workplace hazards and ways to eliminate them can only improve your own operations and the management of your firm. Your organization will get professional advice and assistance on the correction of workplace hazards and benefit from on-site training and assistance provided by the consultant to you and your employees. The consultant can help you establish or strengthen an employee safety and health program, making safety and health activities routine considerations rather than crisis-oriented responses. This program provides incentives and support to smaller, high-hazard employers to develop, implement and continuously improve effective safety and health programs at their worksite(s). The program recognizes employers who have demonstrated exemplary achievements in workplace safety and health by receiving a comprehensive safety and health consultation visit, correcting all workplace safety and health hazards, adopting and implementing effective safety and health management systems and agreeing to request further consultative visits if major changes in working conditions or processes occur that may introduce new hazards.

Who Benefits from an On-Site Consultation?

An effective workplace safety and health management system at your worksite(s) will enable you to:

- Recognize and remove hazards from your workplace.
- Protect your workers from injury and illness.
- Prevent loss of life at your worksite.
- Cultivate informed and alert employees who take responsibility for their own and their coworkers' safety and for worksite safety as a whole.
- Improve employee morale.
- An increased understanding of workplace hazards and remedies will put your managers in a better position to:
 - Comply with federal and state safety and health requirements.
 - Become more effective at their jobs. Management experts believe that the company with a well-managed safety and health system enjoys better overall management.
 - Increase productivity rates and assure product quality.
- An exemplary workplace safety and health management system is "good business sense" that also makes financial sense because it will allow you to:
 - Learn first-hand that the cost of accident prevention is far lower than the cost of accidents and can improve your bottom line by accomplishing the following:
 - Lowering injury and illness rates
 - Decreasing workers' compensation costs
 - Reducing lost workdays
 - Limiting equipment damage and product losses

Getting Started

Since consultation is a voluntary activity, your organization must contact OSHA to request it. The consultant will discuss your specific needs with you and set up a visit date based on the priority assigned to your request, your work schedule and the time needed for the consultant to adequately prepare to serve you. OSHA encourages a complete review of your firm's safety and health situation; however, you may limit the visit to one or more specific problems.

The Consultation Process

1. Opening Conference
 - ✓ When the consultant arrives at your worksite for the scheduled visit, he/she will first meet with you in an opening conference to briefly review the consultant's role and the obligation you incur as an employer.
2. Walk Through
 - ✓ You and the consultant will examine conditions in your workplace. OSHA strongly encourages maximum employee participation in the walk-through.
 - ✓ Better informed and more alert employees can more easily work with you to identify and correct potential injury and illness hazards in your workplace.

Talking with employees during the walk-through helps the consultant identify and judge the nature and extent of specific hazards.

- ✓ The consultant will study your entire workplace or the specific operations that you designate, and discuss the applicable OSHA standards. Consultants will also point out other safety or health risks that might not be cited under OSHA standards, but may pose safety or health risks to your employees. They may suggest and even provide other measures such as self-inspection and safety and health training you and your employees can use to prevent future hazardous situations.
- ✓ The consultant will also provide the following services:
 - An appraisal of all mechanical and environmental hazards and physical work practices.
 - An appraisal of the present job safety and health program or establishment of one.
 - A conference with management on findings.
 - A written report of recommendations and agreements.
 - Training and assistance with implementing recommendations.

3. Closing Conference

- ✓ The consultant will then review detailed findings with you in a closing conference. You will learn not only what you need to improve, but also what you are doing right. At that time you can discuss problems, possible solutions and abatement periods to eliminate or control any serious hazards identified during the walk-through.
- ✓ In rare instances, the consultant may find an "imminent danger" situation during the walk-through. If so, you must take immediate action to protect all employees. In certain other situations that would be judged a "serious violation" under OSHA criteria, you and the consultant are required to develop and agree to a reasonable plan and schedule to eliminate or control that hazard. The consultants will offer general approaches and options to you. They may also suggest other sources for technical help.

4. Abatement and Follow-Through

- ✓ Following the closing conference, the consultant will send you a detailed written report explaining the findings and confirming any abatement periods agreed upon. Consultants may also contact you from time-to-time to check on your progress, and your organization may always contact them for assistance.

Ultimately, OSHA requires hazard abatement so that each consultation visit achieves its objective; effective employee protection. If you fail to eliminate or control identified serious hazards (or an imminent danger) according to the plan and within the limits agreed upon or an agreed-upon extension, the situation must be referred from consultation to an OSHA enforcement office for appropriate action.

The On-Site Consultant's Role

- Help you recognize hazards in your workplace.
- Suggest general approaches or options for solving a safety or health problem.
- Identify kinds of help available if you need further assistance.
- Provide you a written report summarizing findings.
- Assist you to develop or maintain an effective safety and health program.
- Provide training and education for you and your employees.
- Recommend you for a one-year exclusion from OSHA programmed inspections, once program criteria are met.

Unlike a typical OSHA inspection, consultants will not issue citations or propose penalties for violations of OSHA standards. They will also not report possible violations to OSHA enforcement staff, nor will they guarantee that your workplace will "pass" an OSHA inspection. For more information on the OSHA On-Site Consultation Program, visit www.osha.gov.

CRW Insurance & Financial Services can also assist you with your OSHA needs. Contact us today at 920-898-5731 to learn more about our services.

Article sourced from Occupational Safety and Health Administration, www.OSHA.gov.

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Required OSHA Programs and Training - General Industry

The following chart summarizes major Occupational Safety and Health Administration (OSHA) program requirements for general industry. Listed alphabetically by topic, the chart includes the OSHA standard reference, as well as program, audit and training requirements.

OSHA Program Topic	OSHA Reference	Required Program	Required Audit	Required Training		Training Frequency		
				All	Affected	Initial	Annual	Periodic
Accident and Illness Recording and Reporting	1904	Yes	Yes	Yes	---	Yes	No	No
Anhydrous Ammonia Storage & Handling	1910.111	No	No	No	No	No	No	No
Bloodborne Pathogens Safety	1910.1030	Yes	Yes	No	Yes	Yes	Yes	Yes
Compressed Gases (General)	1910.101	No	Yes	No	No	No	No	No
Confined Space Entry (Permit-Required)	1910.146	Yes	Yes	No	Yes	Yes	No	Yes
Dipping & Coating Operations	1910.122-126	No	Yes	No	Yes	Yes	No	No
Electrical Safety Plan	1910.331-335	Yes	Yes	No	Yes	Yes	No	Yes
Emergency Action Plan**	1910.38	Yes	No	Yes	---	Yes	No	Yes
Ergonomics Plan	5(a)(1)	No	No	No	No	No	No	No
Fire Extinguishers (Portable for Employee Use)	1910.157	No	Yes	Yes	---	Yes	Yes	No
Fire Prevention Plan**	1910.39	Yes	No	Yes	---	Yes	No	Yes
First Aid Program	1910.151	No	No	No	Yes	Yes	No	No
Flammable & Combustible Liquids Safety	1910.106	No	Yes	No	Yes	Yes	No	No
General Working Spaces – Housekeeping	1910.141	No	No	No	No	No	No	No
Grain Handling Facilities	1910.272	Yes	Yes	Yes	---	Yes	Yes	Yes
Hand Tool Safety	1910.242	No	Yes	No	No	No	No	No
Hazard Communication Program	1910.1200	Yes	Yes	Yes	---	Yes	No	Yes
Hazardous Waste Operations & Emergency Response (General)	1910.120	Yes	Yes	No	Yes	Yes	Yes	No
Hearing Conservation	1910.95	Yes*	Yes	No	Yes	Yes	Yes	No
Hot Work (Cutting/Welding)	1910.252-255	Yes	Yes	No	Yes	Yes	No	No
Indoor Air Quality	1910.1000	Yes	Yes	No	No	No	No	No
Laboratory Safety	1910.1450	Yes	Yes	No	Yes	Yes	No	Yes
Ladder Safety	1910.25-27	No	Yes	No	No	No	No	No
Laser Safety	5(a)(1)	No	No	No	No	No	No	No
Liquefied Petroleum Gas (LPG) Safety Plan	1910.110	Yes	Yes	No	Yes	Yes	No	No
Lockout/Tagout (Control of Hazardous Energy)	1910.147	Yes	Yes	Yes	---	Yes	No	Yes
Machine Safeguarding	1910.212	No	No	No	No	No	No	No
Material Handling & Crane Safety	1910.179-184	Yes	Yes	No	Yes	Yes	No	No
Means of Egress	1910.36-37	No	No	No	No	No	No	No
Medical and Exposure Record Access	1910.1020	No	No	Yes	---	Yes	Yes	No
Mechanical Power Presses	1910.217	Yes	Yes	No	Yes	Yes	Yes	Yes
Personal Protective Equipment	1910.132	Yes	Yes	No	Yes	Yes	No	Yes
Power Transmission/Generation	1910.269	Yes	Yes	No	Yes	Yes	Yes	No
Powered Industrial Truck	1910.178	Yes	Yes	No	Yes	Yes	No	Yes
Powered Platforms for Building Maintenance	1910.66	No	Yes	No	Yes	Yes	No	No
Process Safety Management	1910.119	Yes	Yes	No	Yes	Yes	No	Yes

Programs listed in **bold** indicate a mandatory written program is required

* Medical evaluation required

**If required by a specific OSHA standard. Employers with fewer than 10 employees may communicate these plans orally instead of in writing.

OSHA Program Topic	OSHA Reference	Required Program	Required Audit	Required Training		Training Frequency		
				All	Affected	Initial	Annual	Periodic
Radiation (Ionizing) Safety	1910.1096	Yes	Yes	No	Yes	Yes	Yes	Yes
Recordkeeping Practices & Reporting	1904	Yes	Yes	Yes	---	Yes	No	No
Respiratory Protection	1910.134	Yes*	Yes	No	Yes	Yes	Yes	Yes
Safety & Health Management Policy	54 FR 3904	No	No	No	No	No	No	No
Safety Committee Organizational Plan	54 FR 3904	No	No	No	No	No	No	No
Safety Signs & Safety Colors	1910.144-145	No	No	Yes	---	Yes	No	No
Spray Finishing	1910.107	No	No	No	No	No	No	No
Telecommunications	1910.268	No	Yes	No	Yes	Yes	No	No
Ventilation	1910.94	No	No	No	No	No	No	No
Walking-Working Surfaces	1910.23-24	No	No	No	No	No	No	No

Toxic & Hazardous Substances	OSHA Reference	Required Program	Required Audit	Required Training		Training Frequency		
				All	Affected	Initial	Annual	Periodic
Asbestos	1910.1001	Yes *	Yes	No	Yes	Yes	Yes	No
Carcinogens (13 listed)	1910.1003	Yes *	No	No	Yes	Yes	Yes	No
Vinyl Chloride	1910.1017	Yes *	Yes	No	Yes	Yes	Yes	No
Inorganic Arsenic	1910.1018	Yes *	Yes	No	Yes	Yes	Yes	No
Lead	1910.1025	Yes *	Yes	No	Yes	Yes	Yes	No
Cadmium	1910.1027	Yes *	Yes	No	Yes	Yes	Yes	No
Benzene	1910.1028	Yes *	Yes	No	Yes	Yes	Yes	No
Coke Oven Emissions	1019.1029	Yes *	Yes	No	Yes	Yes	Yes	No
Cotton Dust	1910.1043	Yes *	Yes	No	Yes	Yes	Yes	Yes
1,2-dibromo-3-chloropropane (DBCP)	1910.1044	Yes *	Yes	No	Yes	Yes	No	No
Acrylonitrile	1910.1045	Yes *	Yes	No	Yes	Yes	Yes	No
Ethylene Oxide	1910.1047	Yes *	Yes	No	Yes	Yes	Yes	No
Formaldehyde	1910.1048	Yes *	Yes	No	Yes	Yes	Yes	Yes
Methylenedianiline (MDA)	1910.1050	Yes *	Yes	No	Yes	Yes	Yes	No
1,3-Butadiene (BD)	1910.1051	Yes *	Yes	No	Yes	Yes	Yes	No
Methylene Chloride	1910.1052	Yes *	No	No	Yes	Yes	No	Yes

*Medical evaluation required

Best Practice Recommendations (Programs not specifically required but programs to be considered nonetheless)		
Safety Rules for Employees	Disaster Recovery Plans	Safety Committee or Safety Teams
Safety Rules for Contractors	Workplace Violence Prevention Plan	Return-to-Work Program
Working with Contractors (legal issues)	Site Security Plan	Medical Management Program
Job Safety Analysis Program	Ergonomic Evaluation Process	New Employee Orientation Program

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