



## **Six Easy Steps for Better OSHA Compliance**

Does your company take specific steps to comply with OSHA, or do you leave that up to accident?

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OSHA inspectors are spread thin, and many companies avoid citations and fines purely by luck. That luck continues until an accident happens and a report is filed or until an accident almost happens and an employee reports the violation. The mindset behind this approach ignores the reason OSHA exists in the first place: to protect employees from injury or death.

Smart companies look at OSHA regulations as a guide, and they want to know what steps they should take to protect their employees. One problem with using OSHA that way is the regulations are often in a book on the Safety Director's shelf while their implementation and ongoing enforcement are left to personal recall by supervisors, procedure writers, and others involved in the administration of the safety program. These six steps will improve compliance by making OSHA regulations less a matter of reference and more a matter of policy.

1. Provide a copy of the relevant Subpart(s) to each person involved in managing a given area specifically covered in OSHA. Make each person responsible for knowing, and teaching from, the relevant Subpart(s). For example, the "qualified person" responsible for the use of scaffolding would need a copy of Subpart L. This person would also be responsible for enforcing Subpart L in the field, telling the affected employees the specific OSHA regulations that apply, and reviewing work procedures to ensure compliance with Subpart L.
2. Make the Safety Director responsible for monitoring how well things are done in the preceding step, rather than being a person who

might consult that rather pristine copy of the OSHA regs to answer the questions that nobody even knows to ask.

3. Practice reverse supervision. Provide some minimal training to all employees, for example a weekly text message sends out an OSHA regulation or “This month’s OSHA Reg” is a topic at a safety talk meeting. This is with the understanding that employees are to provide feedback on how well this is being implemented.

4. Train and hire your own OSHA inspectors. Why wait for OSHA? The training is going to take time and cost money, so it has to be limited in scope. You could set limits like these, for example: It’s to cover just ladder safety and Subpart K, two people will be selected, and you need at least one year of service with the company. Once they pass whatever test is devised, they are free to write citations and levy fines. The “fines” can be \$50 gift certificates the company buys and then awards to employees by the draw from a hat or some other fair system.

5. Ensure the site safety program includes the OSHA references wherever they apply. Have a copy of the OSHA regs available for anyone to peruse, for example on a bookshelf in the maintenance department rather than locked in someone’s office.

6. Send out a text message when an action has been taken, being sure to include the OSHA reference. This is yet another thing that ties “that reg book” to real life. For example, “John Guidry and Joe Johnson filed the sharp edges off the guardrails for the mezzanine outside the west compressor room after Bob Smith reported snagging his shirt on one. This is per OSHA 1926.502(b)(6).”

The consistent implementation of these steps will keep OSHA compliance top of mind without adding huge administrative overhead. By involving employees just a little, you encourage them to think about safety as they go about their work. Even if they never learn which regulation means what, they will be thinking in such a way that common sense tends to inform them. By giving employees some power to oversee the company’s fulfillment of its OSHA responsibilities, you also help ensure the company can correct deficiencies without intervention by OSHA and without some tragedy to be the impetus.