



U.S. Army Center for Health Promotion and Preventive Medicine  
(Provisional)

## OSHA Compliance Inspections for Healthcare Facilities



### Steps to Take Before an OSHA Inspection



What do you do if a compliance officer, or inspector, from the Occupational Safety and Health Administration (OSHA) walks into your office and asks to inspect your facility? With some forethought and advance preparation, you can eliminate or minimize errors that usually take place during an OSHA inspection.

#### **Check the Validity and Scope of the Inspection.**

Immediately notify the Office of Accident Prevention (HSAP) at Headquarters, U.S. Army Health Services Command (DSN 471-6838/8101).

Photocopy the inspector's credentials and supporting documents.

Contact the OSHA area office to verify the inspector's employment and assignment to your facility.

Ask the officer the type of inspection intended (i.e., an imminent-danger inquiry, a fatality inspection, a complaint, a referral, or a general programmed inspection).

Limit the inspector's access to only those areas within the scope of the inspection warrant.

#### **Prepare Staff for the Inspection.**

Instruct all managers and supervisors to periodically review all safety policies and procedures with their employees.

Remind employees to consult with their immediate supervisor or refer to the safety program if an inspector asks a question they cannot answer.

Counsel supervisors never to discuss processes or the operation of machinery and never to allow anyone to conduct demonstrations for an OSHA inspector.

Inform all employees they may choose to be interviewed in private or request the presence of a representative of the employer or union. They also have the right to refuse to be interviewed.

Explain to your employees that you would like to be present during any interviews with the inspector.

Identify all outside contractors present in your facility. Remember, you may receive a notice of unsafe or unhealthful working conditions for a violation committed by a contractor unless you have identified that person or the company as a contractor.

- ◆ **Healthcare Facilities**
- ◆ **Guidance**
- ◆ **Inspection Preparation**

Healthcare Hazards Program  
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Aberdeen Proving Ground, MD 21010-5422  
DSN 584-3040 or Commercial 410-671-3040

### **Review Written Programs and Regulations.**

Assemble and review your safety programs. Allow the inspector access to your written programs and records. The inspector usually asks to see your—

- \* Written safety program.
- \* Accident and injury records.
- \* Employee exposure and medical monitoring records.
- \* Machine inspection records.

Have hazard communication, bloodborne pathogens, lockout/ tagout, and respiratory protection programs available for review also.

Pay special attention to Title 29, Code of Federal Regulations (CFR), part 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters. More specifically, be familiar with—

- \* Posting of notices (29 CFR 1960.26).
- \* Notifying higher authority when assistance is needed for abatement (29 CFR 1960.30).
- \* Equal representation of management and nonmanagement on safety committees (29 CFR 1960.37).
- \* Employee training (29 CFR 1960.56-59).

Prepare yourself to tell the inspector—

- \* The ways in which your safety program is communicated and enforced.
- \* The procedures used to investigate accidents.
- \* The types of safety equipment present in your facility.

The knowledge and self-assurance you display in answering may reduce the number of questions asked by the inspector.

### **References**

1. Title 29, Code of Federal Regulations (CFR), 1992 rev, part 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters.
2. 29 CFR 1960.26, Conduct of inspections.
3. 29 CFR 1960.30, Abatement of unsafe or unhealthful working conditions.
4. 29 CFR 1960.37, Committee organization.
5. 29 CFR 1960.56, Training of safety and health specialists.
6. 29 CFR 1960.57, Training of safety and health inspectors.
7. 29 CFR 1960.58, Training of collateral duty safety and health personnel and committee members.
8. 29 CFR 1960.59, Training of employees and employee representatives.