



# S3 Conference

Screening ❖ Safety ❖ Strategy

*Hosted by DISA Global Solutions*

## Back to Basics:

Strengthening Regulatory Compliance in  
Occupational Health



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1. Identify key regulatory OSHA standards and foundational compliance principles relevant to occupational health practicea
2. Demonstrate strategies to integrate compliance behaviors into daily operations to promote a culture of safety and accountability.
3. Evaluate current organizational practices to identify gaps and develop action steps that strengthen regulatory compliance and staff engagement.



INJURY

SAFETY FIRST

RISK

WORK SAFETY

PROTECTION

REGULATION

HEALTHY

# Who is responsible for worker health, safety & regulatory compliance?



## Occupational Health Technician

- ❖ Paramedic
- ❖ EMT

## Occupational Health Nurse

- ❖ LPN
- ❖ RN

## Occupational Health Provider

- ❖ MD
- ❖ DO
- ❖ NP or PA

## Other Personnel

- ❖ HR
- ❖ Safety
- ❖ Third Party
- ❖ Consultant

# Why is worker safety and health important?



## For the Employee

- ❖ Prevents Harm
- ❖ Improves Well-Being
- ❖ Enhances Focus

## For the Employer

- ❖ Reduces Costs
- ❖ Increases Productivity
- ❖ Boosts Reputation
- ❖ Ensures Compliance
- ❖ Fosters Culture



01

# Assessing Safety Climate & Culture

Safety climate



Safety culture



## Safety Culture Surveys

- ❖ AHRQ Safety Culture Survey (adaptable)
- ❖ Nordic Safety Climate Questionnaires (NOSACQ-50)

## Employee Safety Perception Surveys

- ❖ Short Surveys
- ❖ Assess training adequacy and confidence in reporting
- ❖ Hazards



### ❖ Leadership & Management:

- "My supervisor actively promotes safety in our daily work."
- "Management emphasizes doing tasks safely rather than quickly."
- "Senior leaders visibly care about our safety."

### ❖ Communication & Involvement:

- "Communication about safety issues flows well up and down the organization."
- "I feel safe speaking up with safety concerns or suggestions."
- "My coworkers encourage each other to work safely."

### ❖ Learning & Error Handling:

- "When errors happen, they are treated as learning opportunities."
- "We learn from mistakes to prevent them from happening again."
- "Disciplinary actions for safety incidents are fair and consistent."

### ❖ Work Practices:

- "We follow safety policies and procedures most of the time."
- "There's enough time and staffing to do my job safely."



02

# Assessing/Identifying Safety Risk



- ❖ **Predict**
- ❖ **Prepare**
- ❖ **Prevent**





# HIERARCHY OF CONTROLS





- ❖ OSHA/ISO Checklists
- ❖ JSA/JHA
- ❖ FMEA
- ❖ HIRA (Hazard ID & Risk Assessment)
- ❖ TNA/Competency Tools
- ❖ RCA/Near Miss Analysis
- ❖ EHS Software



03

# Regulatory Compliance in Common OSHA Standards



1. Fall Protection 29 CFR 1926.501
2. Hazard Communication 29 CFR 1910.1200
3. Respiratory Protection 29 CFR 1910.134
4. Scaffolding 29 CFR 1926.451
5. Lockout/Tagout 29 CFR 1910.147
6. Powered Industrial Trucks (Forklifts) 29 CFR 1910.178
7. Ladders 29 CFR 1926.1053
8. Machine Guarding 29 CFR 1910.212
9. Electrical-Wiring Methods 29 CFR 1910.305
10. Eye-Face Protection 29 CFR 1910.133





1. Respiratory Protection 29 CFR 1910.134
2. Hazardous Chemicals
  1. Lead 29 CFR 1910.1025
  2. Asbestos 29 CFR 1910.1001
  3. Benzene 29 CFR 1910.1028
3. Hearing Conservation 29 CFR 1910.95
4. Bloodborne Pathogens 29 CFR 1910.1030
5. Hexavalent Chromium 29 CFR 1910.1026





## 1. Program Administration and Oversight

1. Policy aligns with OSHA standard
2. Surveillance at no cost to the employee
3. Exams on work time
4. Clearly delineated process for referrals

## 2. Hazard ID and Exposure Assessment

1. Job hazard analysis
2. Exposure monitoring
3. Evaluate job tasks
4. Assure all employees impacted are enrolled in the program





- ❖ **Respiratory Protection 29 CFR 1910.134**
  - Medical eval prior to use
  - Annual exams
  - Medical follow-up as needed
  - Apply restrictions as needed
- ❖ **Hearing Conservation 29 CFR 1910.95**
  - Baseline audiogram
  - Annual audiograms
  - STS/25 DB shift follow-up
  - Sound surveys / hearing protection / policy
  - Employee notification / documentation
- ❖ **Bloodborne Pathogens 29 CFR 1910.1030**
  - Policy
  - Hep B vaccine offered, documented, declination
  - Post-exposure follow-up
  - Incident documentation
- ❖ **Haz Comm (Lead, Benzene, Hex Chrom, Asbestos, etc..)**
  - Baseline exams
  - Periodic exams as required
  - Required labs and testing
  - Medical removal if above thresholds





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# Next steps...building the culture and strengthening policy



1. Establish safety and health as a core value
2. Lead by example
3. Implement a reporting system
4. Provide training
5. Conduct inspections
6. Collect hazard control ideas
7. Implement hazard controls
8. Address emergencies
9. Seek input on workplace changes
10. Make improvements



**Occupational Safety  
and Health Administration**



# Recommended Practices for Safety and Health Programs



[GETTING STARTED](#)



[CORE ELEMENTS](#)



[SAFETY AS A CORE VALUE](#)



[EXPLORE TOOLS](#)



[CASE STUDIES](#)

## Explore Tools

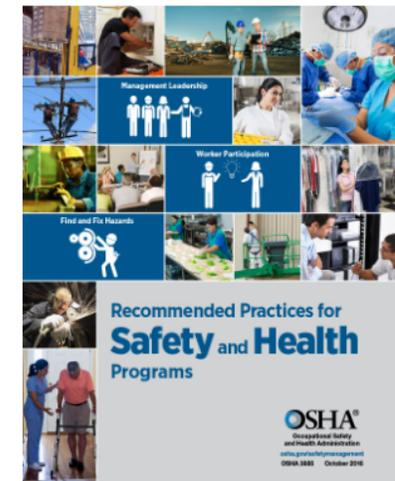
### Safety and Health Program Voluntary Standards Crosswalk

This tool compares the core elements and action items from OSHA's Recommended Practices for Safety and Health Programs to other safety and health program standards and guidelines. Users may find this helpful if they are trying to decide which framework is best suited for them.

Download the [Safety and Health Program Voluntary Standards Crosswalk](#).

### Safety and Health Program Existing OSHA Standards Crosswalk

This tool identifies overlaps between existing OSHA standards that may apply to your workplace and action items described in the Recommended Practices for Safety and Health Programs. These requirements overlap with the guideline's core elements of Management Leadership, Worker Participation, Hazard Identification and Assessment, Education and Training. The tool can help you identify actions you are already taking to comply and use as building blocks for your safety and health program.





## Considerations for safety & health policy development

- ❖ Legally compliant
- ❖ Risk Based
- ❖ Employee informed
- ❖ Clearly communicated
- ❖ Leadership supported
- ❖ Continuously improved

Consider emotional intelligence  
in policy development





## OSHA Resources:

<https://www.osha.gov/safety-management/explore-tools>



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### **Safety and Health Program Self-Evaluation**

Download the [program self-evaluation](#) and use it to determine how closely your existing policies, programs and practices conform to good Safety and Health Program design.

### **Safety and Health Program Implementation Checklist**

Download the [program implementation](#) checklist and use it to track those action items you have completed, and serve as a reminder of what is left to do.

### **Safety and Health Program Audit Tool**

Download the [program audit tool](#) and use it to evaluate your program and how well your organization has implemented it, identify remaining weaknesses, and use the results to focus on continual improvement.

### **Safety and Health Programs and Leading Indicators**

Download the [Leading Indicators guidance](#) and use it to learn how to develop and track leading indicators to improve safety and health outcomes.

### **Example Safety and Health Program**

Download an [example safety and health program](#) for a fictitious small business, Local Cleaners. It shows simple approaches a small business can take to start implementing the core elements of a safety and health program, as described in OSHA's Recommended Practices for Safety and Health Programs.

### **Job Hazard Analysis Worksheet**

Download the [Job Hazard Analysis \(JHA\)](#) worksheet for tips on conducting a JHA and help with identifying hazards in your workplace.

### **Job Hazard Analysis (JHA) Template**

Download the [Job Hazard Analysis \(JHA\) Template](#) to use in your workplace when identifying hazards and conducting JHAs.

### **Hierarchy of Controls Worksheet**

Download the [Hierarchy of Controls](#) worksheet and use it to identify appropriate controls for hazards in your workplace.



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# Case Study



**Organization**: Mid-Atlantic Metal Fabrication Inc.

**Industry**: Heavy manufacturing

**Employees**: 145 employees, 8-12 hour shifts

**Noise Exposure**: Average sound levels ranged from 85-98 dBA in production areas

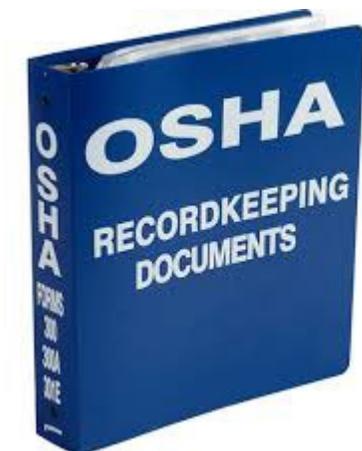
**OSHA Regulatory Standard**: Hearing Conservation 29 CFR 1910.95



## Noted OSHA inspection concerns:



- ❖ Failure to conduct Annual Audiometric Testing
- ❖ Missing baseline exams on newly hired workers
- ❖ Improper testing conditions.... (calibration of equipment and ambient noise monitoring)
- ❖ Lack of follow-up on STS, and employee notification
- ❖ Inadequate recordkeeping
  - missing/incomplete audiometric records
  - records not retained for required duration



- ❖ Multiple citations totaling \$28,000 in penalties
- ❖ Company placed under increased regulatory scrutiny
- ❖ Corrective Action Plan was mandated



## What are the corrective actions needed by the organization:



- ❖ Contact a certified occupational audiology provider
- ❖ Establish a structured audiometric surveillance schedule
- ❖ Ensure audiograms are reviewed and STS addressed promptly
- ❖ Improve hearing protection training and fit testing
- ❖ Implement electronic recordkeeping with compliance alerts
- ❖ Conduct management and employee education on hearing conservation





*Noncompliance with OSHA testing requirements places both employees and employers at significant risk.*

*Effective surveillance protects worker health, reduces liability, and demonstrates a commitment to occupational safety*





**THANKS!**

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