

Twelve Steps to Safety

Step Eleven: Utilizing OSHA's Consultation Program

In September 2003, CMAA signed an Alliance with OSHA to promote safe and healthful working conditions for membership club employees in the areas of hazard communication, recordkeeping and respiratory protection. In February 2005, CMAA renewed its Alliance and added a new scope of concentration, landscaping and horticulture. The Alliance was again renewed in October of 2007. This article, the eleventh in a series of 12 articles, was written by club industry expert Alan Achatz, CCM, CHE, of AKA Capitol Adventures in conjunction with participants in the OSHA and CMAA Alliance. The purpose of this series is to help new and seasoned managers embark on a path to safety compliance at their facilities.

Clubs 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 Occupational Safety and Health Administration (OSHA) inspections using the free On-Site Consultation Service. Largely funded by federal OSHA, 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 available as well. Primarily targeted for smaller businesses, this safety and health consultation program is completely separate from the OSHA inspection effort. In addition, no citations are issued or penalties proposed.

It's confidential, too. Your name, your club's name and any information 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 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

Knowledge of your workplace hazards and ways to eliminate them can only improve your own operations and the management of your club. You 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.

The OSHA Consultation Safety and Health Achievement Recognition Program (SHARP) provides incentives and support to smaller, high-hazard employers to develop, implement and continuously improve effective safety and health programs at their worksite(s). This 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. Employers meeting these specific program requirements may be exempt from general scheduled OSHA inspections for one year.

How To Get Started

Because consultation is a voluntary activity, your club must request it. Your telephone call or letter sets the consulting machinery in motion. 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 operation's safety and health situation; however, if you wish, you may limit the visit to one or more specific problems.

Opening Conference

When the consultant arrives at your club for the scheduled visit, he or 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.

Walk Through

Together, 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 you designate and discuss the applicable OSHA standards. Consultants also will point out other safety or health risks that might not be cited under OSHA standards, but nevertheless 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

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can use to prevent future hazardous situations.

A comprehensive consultation also includes: (1) appraisal of all mechanical and environmental hazards and physical work practices; (2) appraisal of the present job safety and health program or establishment of one; (3) a conference with management on findings; (4) a written report of recommendations and agreements; and (5) training and assistance with implementing recommendations.

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.

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 your progress. You, of course, may always contact them for assistance.

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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 Can:

- Help you recognize hazards in your club;
- Suggest general approaches or options for solving a safety or health problem;
- Identify kinds of help available if you need further assistance;
- Provide you with a written report summarizing findings;
- Assist you with developing or maintaining an effective safety and health program; and
- Provide training and education for you and your employees.

The On-site Consultant Will Not:

- Issue citations or propose penal-

ties for violations of OSHA standards; or

- Guarantee that your workplace will "pass" an OSHA inspection.

Additional Resources

State Consultation Office Directory:

www.osha.gov/dcsp/smallbusiness/consult_directory.html

For more information on how your club can benefit from the Alliance and OSHA topics specific to the club industry, please visit <http://www.cmaa.org/> or contact Melissa Low, Director, Industry Resources and Legislative Services, at melissa.low@cmaa.org or (703) 739-9500. This article was written by club industry expert Alan Achatz, CCM, CHE, of AKA Capitol Adventures in conjunction with participants in the OSHA and CMAA Alliance. It does not necessarily reflect the official views of OSHA or the U.S. Department of Labor. ◆