Tips for Managing an OSHA Inspection
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The Occupational Safety and Health Administration (OSHA) Local Emphasis Program (LEP) will allow for random inspections of dairy farms in New York that have 11 or more employees. The following is a list of things farm owners can do to manage an OSHA inspection if they are selected.

1. **Check the credentials of the OSHA Compliance Safety and Health Officer (CSHO)**
The CSHO will arrive unannounced. They will go to the main business address for the farm and, upon arriving, will look for the main office and ask for the owner or the owner’s representative. When they have located this person they will show their credentials signifying that they are an OSHA officer. Check the credentials closely. If you are suspicious that the person is not an OSHA officer, call your regional OSHA office to verify the person’s identity.

2. **Opening conference with the CSHO**
The CSHO will explain the reason why they are there. If it is a random LEP inspection, or if they come for a specific reason, such as an accident, complaint, or referral, they can inspect your entire farm. The CSHO will ask if your farm is large enough to be inspected based on the number of employees. If your farm employs **11 or more employees** (one part time employee equals one full-time employee) currently and at any one time during the last 12 months on the day the OSHA CSHO arrives, your farm is eligible to be inspected. Immediate family members of the farm owner are not counted as employees.

3. **Review of safety records**
The next step of the inspection process will be a review of the farm’s safety records. The CSHO most likely will ask to review the OSHA 300 Logs, Hazard Communication Program and all other safety training records and written programs. Having these records available and in good order can help to make your inspection go well. Not having these records could be a violation.

4. **Alert your staff that OSHA is on the farm and get your inspection team ready**
While the CSHO is reviewing the safety records, alert your employees that an OSHA inspector is on the farm and will be starting to do the walk around inspection.

5. **Take good notes and pictures during the inspection**
During the inspection, the CSHO will explain what they are concerned with. They will be taking pictures and notes. Have some staff available to write down what was discussed and take pictures of items that are of concern to the CSHO. You will want to have a record of everything the CSHO is concerned with. If there are things you can correct during the inspection, have employees do that for you while the inspection is proceeding, as long as the employee is not at risk while correcting the problem. CSHOs
may observe employees performing their jobs, but they will never ask an employee to demonstrate how to do a task. The CSHO may ask to interview employees. The farm owner or the employees’ management supervisor cannot be present during these interviews. For Spanish speaking employees, the farm owner can have a farm interpreter present, as long as that person is not the employees’ supervisor.

6. Closing Conference
When the inspection is complete, the CSHO will have a closing conference with you. During this closing conference, they will summarize what they observed in the inspection and what they are concerned with. Make sure that you record what they were concerned with.

7. Correcting Problems
After the inspection is completed, OSHA has up to six months to get their citation letter back to you. During this time period, where possible, you will want to correct things that were noted in the inspection. Document these changes that you have made. After you receive the citation letter you have fifteen working days to contest or settle the citation. If you do not contest or settle the citations within the fifteen working day period, the citations will be final and you will owe the full amount of the fines. You can request an informal conference where you show how you corrected the hazards that were in the citation letter. If you feel that an improvement is not possible, the citation may be contested.

There is a New York OSHA Dairy Work Group. Members of the work group include the Northeast Dairy Producers Association (NEDPA), Cornell PRO-DAIRY, NY Farm Bureau (NYFB), New York Center for Agricultural Medicine and Health (NYCAMH), and Cornell Cooperative Extension (CCE). The goal of the OSHA Work Group is to help the New York State dairy farm industry prepare for OSHA inspections. NYCAMH is available to come to farms to provide safety training and safety surveys. These services are funded by the New York State Department of Labor Hazard Abatement Board, and the New York State Department of Health. For more information call NYCAMH at (800) 343-7527, or e-mail at: info@nycamh.org