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# MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)  
Department of Labor and Economic Opportunity (LEO)

## AGENCY INSTRUCTION

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DOCUMENT IDENTIFIER:  
MIOSHA-ADM-10-2R4

DATE: July 12, 2023

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**SUBJECT: Take A Stand Day (TASD) Guidelines**

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- I. Purpose. To provide guidelines for the promotion, processing, completion, and documentation of Take a Stand Day (TASD) Request for Consultative Assistance (RCA).
- II. Scope. This instruction applies agency wide.
- III. References.
  - A. Agency Instruction MIOSHA-ADM-06-8 [Coordination of Enforcement and Consultation Interventions](#), as amended.
  - B. Division Instruction CETD-ADM-09-1 [Onsite Consultation Program Policies and Procedures Manual](#), as amended.
  - C. Division Instruction CETD-ADM-13-1 [Consultation Education and Training \(CET\) Division Operations Manual](#), as amended.
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.
- V. Cancellations. All previous versions of this agency instruction.
- VI. Next Review Date. This instruction will be reviewed in three years from date of issuance.
- VII. History. History of previous versions includes:

MIOSHA-ADM-10-2R3, March 31, 2020  
MIOSHA-ADM-10-2R2, August 4, 2016  
MIOSHA-ADM-10-2R1, June 7, 2013  
MIOSHA-ADM-10-2, April 7, 2010
- VIII. Contact. [Sherry Scott](#), Safety and Health Program Manager/Michigan Voluntary Protection Program Manager, Consultation Education and Training (CET) Division
- IX. Originator. Barton G. Pickelman, Director
- X. Background. TASD was started in 2005 as a special activity to help celebrate MIOSHA's 30<sup>th</sup> Anniversary and increase awareness of worker safety. TASD has become an annual event and remains the only event of this type held. MIOSHA staff, both compliance and consultation, are available on TASD to provide consultation visits with no penalties and no citations. A condition of participation for employers is to agree to correct any serious hazards observed on TASD. The employer must correct imminent danger situations immediately or remove employees from the danger area. Failure to remove employees from an imminent danger area will result in immediate referral to enforcement.
- XI. Significant Changes.
  - A. Updated photo release requirements.
  - B. Updated appendices to align with current CET procedures for tracking.

XII. General Responsibilities.

- A. TASD Workgroup. A multidivisional team of volunteers tasked with oversight of policy and procedure for TASD activities which include tracking of TASD activities, and development of all TASD promotional documents, activity documents, and reporting documents.
- B. TASD Liaison Responsibilities. A TASD liaison will be designated from General Industry Safety and Health Division, Construction Safety and Health Division, and CET Division. Each division liaison will be responsible to track through completion all TASD activities within their division and provide assistance to other division liaisons to satisfy all TASD administrative activities which include:
  - 1. Receive, review, and assign TASD Requests for Consultative Assistance (RCA) (See [Appendix A](#)). Supervisory approval must be obtained on all TASD assignments. All TASD assignments must be made a minimum of three weeks prior to the TASD event.
  - 2. Fill in the following sections on the bottom of the RCA and maintain a copy.

Assigned To:	Date Assigned (Sent):	Assigned By:	NAICS:
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- 3. Ensure compliance staff has the first choice of all TASD RCAs.
  - 4. Work with supervisors to ensure all TASD recommendations are issued to employers by the close of the TASD visit but not to exceed five business days from TASD visit.
  - 5. Email TASD resources to all division field staff with TASD assignments. The email will contain links to documents such as posters, brochures, and a Thank You Letter (See [Appendix B](#)).
- C. Promotion of TASD. Each year a promotional card will be developed by the MIOSHA Communications Specialist and TASD Workgroup to use to promote TASD. Promotional materials and communications will include the following language: “Requests for TASD will be assigned on a first come-first served basis with first-time participants and small employers given preference.” Industry sectors targeted by the MIOSHA strategic plan will be mailed promotions. Enforcement staff will distribute cards during all inspections and encourage employers to share information with other companies in their community. All other MIOSHA staff will help promote TASD by distributing cards to high hazard companies, during training sessions, promotional calls, and other interventions. Cards will be emailed to MIOSHA partners, stakeholders, and other organizations.
- D. TASD Photos. Photos should be taken of TASD activities. The employer agrees to allow pictures to be taken and their name and images used for promotional activities when they submit the TASD RCA. However, if the employer needs a written request for photos to be taken then the LEO Photo Release Form needs to

be filled out and returned with the photos (See [Appendix C](#)). The LEO Photo Release Form must be signed by an employer representative (i.e., plant manager, general manager, owner, human resource director). The TASD RCA also allows for an employer to opt out of releasing photos for promotional material.

Promotional photos of MIOSHA staff providing consultation to the employer/employees (not of violations) must be turned in to the division TASD liaison within five working days following the closing of the consultation.

Submission should ensure the company name and names of all individuals in the photos are provided in case the photo is selected for use in the MIOSHA News, MIOSHA Messenger, LEO newsletter, or social media.

- E. TASD Requests. To request consultative assistance on TASD, employers will fill out the TASD RCA (See [Appendix A](#)). The TASD RCA form will be placed on the MIOSHA web page and can be submitted electronically, faxed, or mailed to the CET office. TASD requests for services will primarily be for an inspection. MIOSHA supervisory staff will handle calls from employers and if an employer has open citations (under appeal), the information should be noted on the RCA. MIOSHA support staff will direct employers to complete the TASD RCA. All TASD requests for abatement assistance will be done in accordance with MIOSHA-ADM-06-8 [Coordination of Enforcement and Consultation Interventions](#), as amended.

### XIII. Enforcement Staff Responsibilities.

- A. Contact the employer within three business days of receipt of the TASD assignment to discuss the RCA and schedule the visit. All TASD RCAs must be contacted to schedule service. Contacts must be made a minimum of two weeks prior to the event.
- B. Upon initial contact on a multi-employer site, staff may suggest that other subcontractors be invited to the opening conference.
- C. An employee/union representative must be invited to participate during the consultation activity. If they decline, the consultation may still be conducted.
- D. The consultation should be completed in one day. In very limited circumstances, enforcement staff may go back for a second day with supervisor approval.
- E. If one day is not adequate to complete the consultation, a referral will be sent to the CET TASD liaison. If a referral is necessary, indicate this on the TASD Recommendations form (See [Appendix D](#)) and submit the form and the TASD RCA assignment to the supervisor. The supervisor will submit the form and RCA to the CET TASD liaison.
- F. Enforcement staff may be reassigned on TASD to handle a fatality or other emergency. If this occurs, send the RCA back to the division TASD liaison.
- G. Utilize the TASD Recommendations form to document any hazards identified during the visit (See [Appendix D](#)). The completed TASD Recommendations form will be provided to the employer at the closing of the consultation or within five business days of the closing of the consultation.

- H. Some limitations may need to be considered on a large project due to time constraints. List the names of the other subcontractors attending the opening conference on the TASD Recommendations form. On multi-employer worksites, recommendations will be put on one list for all subcontractor employers.
  - I. To show good faith, immediately after the TASD activity, compliance should not initiate an inspection at a TASD site and propose citations for the hazards identified during the TASD activity, unless an accident occurs or a complaint is received. Construction employers will have a maximum of 10 calendar days after the TASD visit to correct the hazards. General industry employers will have a maximum of 30 calendar days to correct hazards.
  - J. For any specific issues or questions that may arise on TASD, contact your supervisor.
  - K. Completed RCAs and recommendations MUST be turned in to the division TASD liaison not to exceed five business days following TASD.
  - L. The OSHA Information System (OIS) Time Report will be used for all time spent on these activities, including travel time.
  - M. Upon completion of the consultation, staff will email the company contact the TASD resource links that contain general MIOSHA information and a Thank You Letter (See [Appendix B](#)).
- XIV. CET Staff Responsibilities.
- A. CET staff is NOT allowed to self-assign TASD RCAs.
  - B. Contact the employer within three business days of receipt of the TASD assignment to discuss the RCA and schedule the visit. All TASD RCAs must be contacted to schedule service. Contacts must be made a minimum of two weeks prior to the event.
  - C. Due to volume of TASD RCAs received, CET staff may receive multiple TASD assignments.
  - D. Upon initial contact on a multi-employer site, staff may suggest that other subcontractors be invited to the opening conference.
  - E. An employee/union representative must be invited to participate during the consultation activity. If they decline, the consultation may still be conducted.
  - F. CET Onsite staff will conduct TASD visits in accordance with CETD-ADM-09-1 [Onsite Consultation Program Policy and Procedures](#) Manual and use OIS forms to document the visit, the hazards identified during the visit, and other TASD activities.
  - G. CET Training and Consultation staff will conduct TASD visits in accordance with the CET Operations Manual and utilize the TASD Recommendations form (See [Appendix D](#)) for documenting the visit, the hazards identified during the visit, and other TASD activities. A copy of the completed TASD Recommendations form will be provided to the employer within five business days of the completion of

the consultation.

- H. For any specific issues or questions that may arise on TASD, employees should contact their immediate supervisor.
- I. Completed recommendations must be turned in to the division TASD liaison within five business days following TASD.
- J. Upon completion of the consultation, staff will email the company contact the TASD resources links that contain general MIOSHA information and a Thank You Letter (See [Appendix B](#)).

APPENDIX A



**MIOSHA "Take a Stand Day"  
 Request for Consultative Assistance**

Received By \_\_\_\_\_

Contact Information					
Contact Name & Title				Date	
Establishment Name					
Street Address			City	State	ZIP Code
Telephone Number			Cell Phone Number	Fax	
E-mail Address					
TASD Request Information					
Type of Business				<input type="checkbox"/> General Industry	<input type="checkbox"/> Construction
Site Address			City	State	ZIP Code
Number of Employees	NAICS Code	Have you participated in TASD in the past:			
		<input type="checkbox"/> Yes <input type="checkbox"/> No			
How did you hear about TASD?					
<input type="checkbox"/> Association/Organization <input type="checkbox"/> MIOSHA Staff <input type="checkbox"/> Website <input type="checkbox"/> E-mail <input type="checkbox"/> Flyer					
Consultation Requests					
<input type="checkbox"/> Safety -Examples- <input type="checkbox"/> Health -Examples-					
Additional Information/Comments:					

By participating in "Take a Stand Day," your photos may be used for MIOSHA promotional material. If you do not wish to release photos for promotional material, please contact the CET Division at 517-284-7720.

MIOSHA USE ONLY		
Assigned To	Date Assigned	Assigned By
Consultation Contact Completed		
Date Received	Initial Contact Date	NAICS
Action		
Additional CET Follow-up Needed?		
<input type="checkbox"/> Yes <input type="checkbox"/> No		

MIOSHA-ADM-10-2R4  
July 12, 2023  
Take A Stand Day (TASD) Guidelines

**APPENDIX B**

Thank You Letter

(Print on Letterhead)

(Date)

Dear Sir or Madam:

Thank you for agreeing to participate in MIOSHA's (year) "Take a Stand for Safety and Health Day." We appreciate and applaud your proactive efforts to improve the safety and health of your employees.

By participating in this event, we hope that the MIOSHA staff provided you with the assistance you requested and gave you an opportunity to learn more about safety and health management systems.

We would appreciate your comments to improve our program. Please complete the enclosed comment card and return it to our office.

If you have any questions or need additional assistance with any occupational safety and health issues, please contact our Consultation Education and Training Division at 517-284-7720.

Sincerely,

Barton G. Pickelman, CIH  
MIOSHA Director

Enclosure

**APPENDIX C**

LEO Photo Release Form

(Print on LEO Letterhead)

**Michigan Department of Labor and Economic Opportunity  
Release Form**

I hereby grant the Michigan Department of Labor and Economic Opportunity (LEO) or its designated contractor the right to use photographs and/or videotaped segments of me for the purpose of providing public information about LEO and/or the Michigan Occupational Safety and Health Administration (MIOSHA).

I also grant permission for LEO or its designated contractor to use my name, and/or quotes in connection with these photographs/videotapes, in publications, presentations, on the MIOSHA website ([www.michigan.gov/miosha](http://www.michigan.gov/miosha)) and other outreach efforts.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Date: \_\_\_\_\_

Address: \_\_\_\_\_

City/State/Zip Code: \_\_\_\_\_

Telephone/Email: \_\_\_\_\_

.....  
(Below for MIOSHA use only)

MIOSHA Contact: \_\_\_\_\_

Photos Taken On: \_\_\_\_\_

Location/Event: \_\_\_\_\_

Subject Matter: \_\_\_\_\_



**APPENDIX D**

**TAKE A STAND DAY  
 RECOMMENDATIONS**  
 Michigan Department of Labor and Economic Opportunity  
 MIOSHA  
 P.O. Box 30643, Lansing, MI 48909

Inspection #:	County:	Page:	Of:
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Safety/Health Officer:	Contact Date:
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Contact Person:	Phone:
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Company:
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Street Address:
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City:	State:	Zip Code:
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If location of inspection/activity is different than mailing address, please complete information.

Street # and Name:	City:	County:
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An inspection of your premises or worksite revealed the following conditions which may constitute a threat to the safety or health of your employees:	<u><b>Employer's Section Action Taken:</b></u>

Employers: Please give these recommendations your immediate attention. Questions can be directed to the appropriate MIOSHA Division: Construction Safety and Health, (517) 284-7680; General Industry Safety and Health, (517) 284-7750, or Consultation Education and Training, (517) 284-7720.

Employer's Signature	Date
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