

## IS OSHA'S TEMP WORKER INITIATIVE FORESHADOWING THINGS TO COME?

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I support OSHA's temporary worker focus. Employers need to take more steps to ensure that temporary employees don't fall through the cracks and do not receive adequate safety training, Howard wrote.

However, employers should also make long-term plans based on what the initiative tells us more broadly about where workplace enforcement is heading, he suggested.

Howard broke the discussion into two subjects:

- The helpful new OSHA Bulletin On Temporary Worker Injury and Illness Recordkeeping Requirements indicates a more expansive view of Temp Agency and Employer obligations.
- The Temporary Worker Initiative is merely one example of regulator discomfort with the new workplace where investors drive companies to focus on "core competencies" and use suppliers, contractors, temps and management services to perform work previously done by "their own employees." We may see the concepts of "employee," "joint employer" and "employer" eventually turned on their heads. Much of this discussion will be in future posts.

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