

JULY 29, 2025 | FIRM NEWS

Aaron R. Gelb and Ashley D. Mitchell Featured in the Inside OSHA Article “Employers Urged to Review LOTO As OSHA Renews Amputation Focus,” by Lara Beaven

Conn Maciel Carey LLP’s Midwest OSHA Chair, [Aaron R. Gelb](#), and OSHA Associate, [Ashley D. Mitchell](#), were prominently featured in [Inside OSHA](#) for their analysis of OSHA’s renewed Machine Safety (Amputations) National Emphasis Program.

The article highlights their recent blog post on CMC’s OSHA Defense Report, “[OSHA Renews Its Machine Safety \(Amputations\) National Emphasis Program](#),” where they break down which employers will be targeted for inspections under the NEP, explain what employers can expect from these inspections, and offer practical steps to strengthen compliance and mitigate risk.

The following is an excerpt from the article on Inside OSHA:

“Given the fact that LOTO and machine guarding are consistently among the Top 10 most frequently cited standards every year, manufacturers will likely receive one or more citations if (and when) they are selected for inspection under the” renewed National Emphasis Program (NEP) on Amputations In Manufacturing Industries, Aaron R. Gelb and Ashley D. Mitchell, attorneys with the employer-focused firm Conn Maciel Carey, write in [a July 22 post](#) on the firm’s OSHA Defense Report blog.

The attorneys add that once an employer receives citations under either or both standards, they face the prospect of being subject to more costly repeat citations if OSHA returns after a self-reported serious incident or employee complaint; employers that receive a certain combination of repeat and/or willful LOTO and machine guarding violations may then be placed in OSHA’s severe violator enforcement program.

“Faced with such potentially serious consequences, manufacturers should consider taking a closer look at the state of machine guarding in their facilities and thoroughly evaluating their LOTO programs, paying particular attention to their training, machine specific procedures, and periodic inspections,” the attorneys write, adding that even the most sophisticated employers can struggle, at times, with these standards.

Read the full article on [Inside OSHA](#).