

HR Insights

What Changed in 2025: A Quick Guide to OSHA & DOT Compliance for HR



Introduction

New year, new rules. 2025 brings a few “must-notice” changes (and carry-overs) that affect reporting, inspections, PPE fit, and transportation testing. This guide highlights what’s new, what’s pending, and the exact next steps HR teams should take now.

OSHA: What’s New, What’s Active, and What’s Coming

A. Electronic injury/illness reporting: 2025 filing window

- OSHA’s Injury Tracking Application (ITA) deadline for timely submission of 2024 data was March 2, 2025 - if your company missed it, you must still submit ([OSHA, 2025](#)).
- Reminder: Certain establishments with 100+ employees in listed industries must submit 300A, 300, and 301 data electronically via ITA; others continue with 300A only ([National Law Review, 2025](#)).

HR Action Checklist:

- Confirm whether your NAICS code triggers the 100+ employee 300/301 electronic submission.
- If overdue, submit via ITA now (late submissions are still required).



B. PPE must properly fit construction workers (effective January 2025)

- OSHA finalized a revision to the construction PPE rule requiring PPE to properly fit each affected employee; the effective date is January 13, 2025. This aligns construction with general industry expectations and addresses long-standing fit issues (e.g., for women in construction) ([Federal Register, 2024](#)).

HR Action Checklist:

- Update written PPE programs to explicitly require proper fit; refresh training and documentation.
 - Audit suppliers to ensure availability of inclusive size ranges for all roles.
-

C. Walkaround rule (still in effect)

- OSHA's Worker Walkaround Representative final rule (effective May 31, 2024) clarifies that employees may authorize another employee or a qualified non-employee (e.g., with relevant expertise) to accompany OSHA during inspections. Expect this to be applied during 2025 inspections ([American Bar, 2024](#)).

HR Action Checklist:

- Update inspection/visitor protocols so site leads know how to handle third-party walkaround representatives ([OSHA, 2024](#)).

D. Heat Illness Prevention standard: where it stands now

- OSHA held informal public hearings June 16–July 2, 2025 on its proposed Heat Injury and Illness Prevention rule; the post-hearing comment period runs to September 30, 2025. A final rule is not yet in effect, but momentum is strong ([OSHA, 2025](#)).

HR Action Checklist:

- Implement a baseline heat plan (water, rest, shade, acclimatization, training) now; it mirrors core elements likely to appear in a final rule.





DOT (FMCSA): What HR Needs to Know for 2025

A. Random testing rates

- For FMCSA-regulated drivers, the random drug testing rate remains 50% and random alcohol 10% for 2025 (DOT, 2025).

HR Action Checklist:

- Confirm your 2025 random selections meet 50% drug / 10% alcohol minimums across your FMCSA pool (or combined pool if you're multi-modal).
-

B. Clearinghouse queries: pre-employment and annual

- Employers must conduct a pre-employment full query before placing a CDL driver in a safety-sensitive role, and at least one annual query per driver on a rolling 365-day basis (FMCSA, 2019).

HR Action Checklist:

- Calendar your annual queries by driver anniversary (or a fixed month) and maintain signed limited consent for annual checks; obtain electronic specific consent for pre-employment full queries (FMCSA, 2023).

C. “Clearinghouse II”:

CDL/CLP downgrade for “prohibited” drivers

- As of November 18, 2024, States must downgrade a CDL/CLP when a driver is in “prohibited” status in the Clearinghouse; States have 60 days after notification to complete the downgrade. This enforcement continues in 2025 and affects hiring and renewals ([FMCSA, 2024](#)).

HR Action Checklist:

- Don’t move applicants forward (or schedule road tests) until the pre-employment full query clears; confirm status again if there are record changes within 30 days ([FMSCA, 2025](#)).
 - If a current driver becomes prohibited, remove from safety-sensitive duties and begin RTD steps immediately to avoid CDL downgrade issues.
-

D. DOT oral-fluid testing: still pending labs

- DOT authorized oral-fluid testing in 2023, but implementation requires at least two HHS-certified oral-fluid labs. As of the latest official listing (Dec. 5, 2024), no labs were certified—so most programs remain urine-based unless/until HHS updates that list. (Check this HHS page before changing your policy.) ([DOT, 2024](#))

HR Action Checklist:

- Keep policies urine-centric unless you confirm current HHS listings show two certified oral-fluid labs. Document your periodic checks.

2025 OSHA and DOT Compliance Update

One-Page HR Checklist

1.) OSHA Reporting

- ☐ Confirm NAICS coverage; submit any overdue 2024 data in ITA.

2.) PPE Program (Construction)

- ☐ Add explicit proper-fit language; ensure inclusive sizing in inventory.

3.) Inspection Readiness

- ☐ Update protocols for third-party walk-around reps during OSHA inspections. Train site leads.

4.) Heat Readiness (All Seasons)

- ☐ Implement heat plan now (water, rest, shade, acclimatization, training).

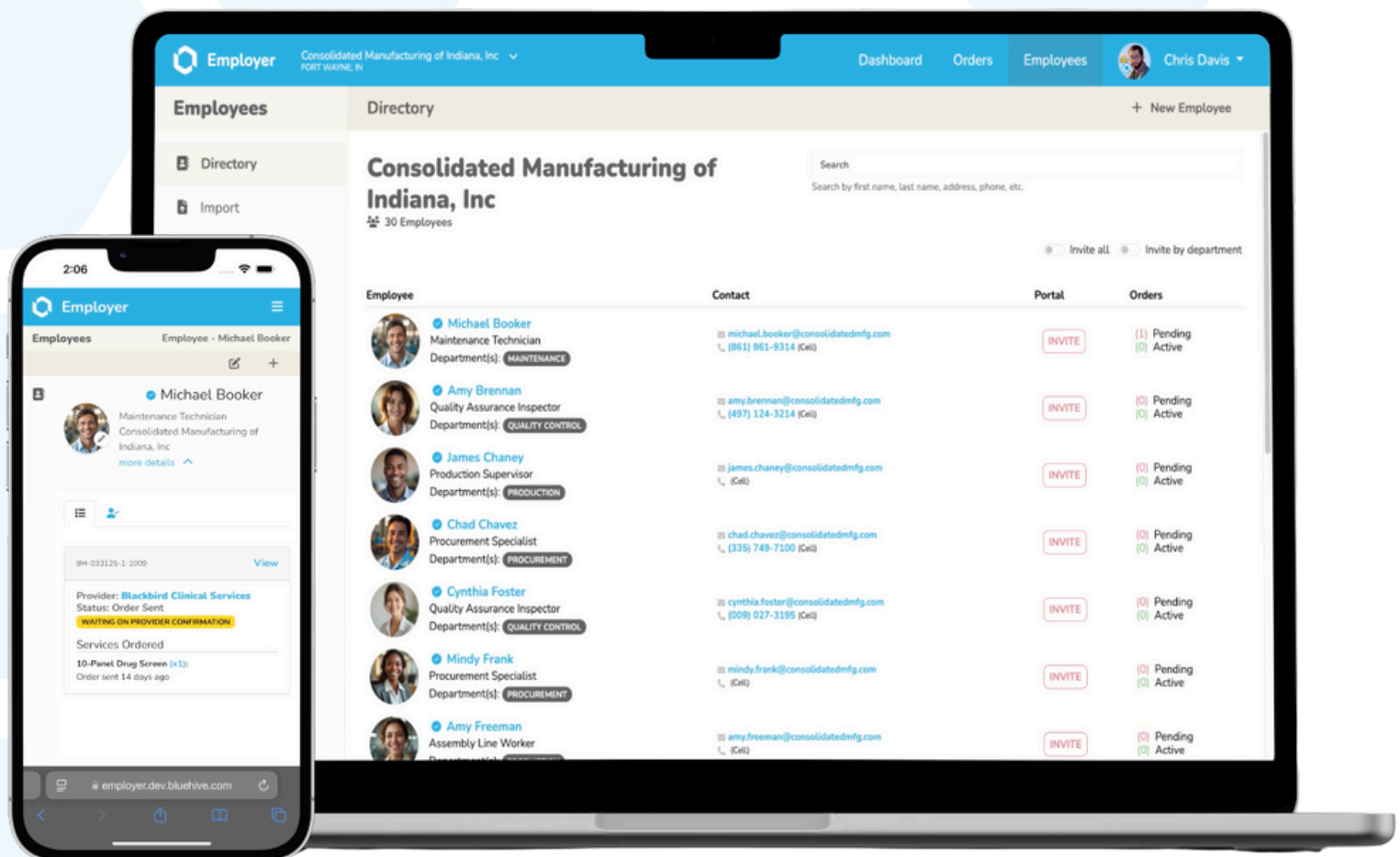
5.) DOT Testing and Clearinghouse

- ☐ Maintain 50% drug / 10% alcohol random rates for 2025.
- ☐ Run pre-employment full query + annual queries (rolling 365 days).
- ☐ Monitor “prohibited” statuses; manage RTD to avoid CDL/CLP downgrades.
- ☐ Check HHS page before adopting oral-fluid testing.

Where BlueHive Fits

BlueHive is here to partner with you as you ensure that your workflow is in line with the latest OSHA and DOT compliance updates.

- **Faster filings and fewer gaps:** Centralize OSHA incident data so ITA submissions aren't a fire drill.
- **PPE and training tracking:** Assign/track PPE by size, plus refresher trainings (walk-around, heat).
- **DOT automation:** Automate annual query cloks, pre-employment full queries, and RTD tracking - so no one slips through.
- **Provider network on tap:** 20,000+ clinics for physicals, drug/alcohol tests, and fit-for-duty exams (including fast scheduling during hiring surges).



Conclusion

Regulatory changes don't have to feel overwhelming. While 2025 brings new expectations - like properly fitting PPE, updated OSHA reporting obligations, and heightened DOT enforcement around drug and alcohol testing - the good news is that most of these updates are practical steps HR teams can manage with the right preparation.

The key is consistency: updating policies, training managers, running timely queries, and documenting everything along the way. By staying proactive, you not only avoid costly penalties but also create a safer, healthier environment for your workforce.

And remember - you don't have to navigate compliance alone. Tools like BlueHive make it easier to track deadlines, centralize documentation, and connect with providers across the country. With the right partner, compliance transforms from a yearly scramble into a seamless, stress-free process.

2025 can be your smoothest year yet - if you take action now.



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Compliance Checklist:
What HR Leaders
Need to Know About
OSHA in 2025



2025 OSHA Compliance Checklist

Make sure that you're prepared for 2025 OSHA compliance changes and reporting requirements! This whitepaper includes a printable checklist that you can use to ensure that you're ready for whatever the new year may bring!

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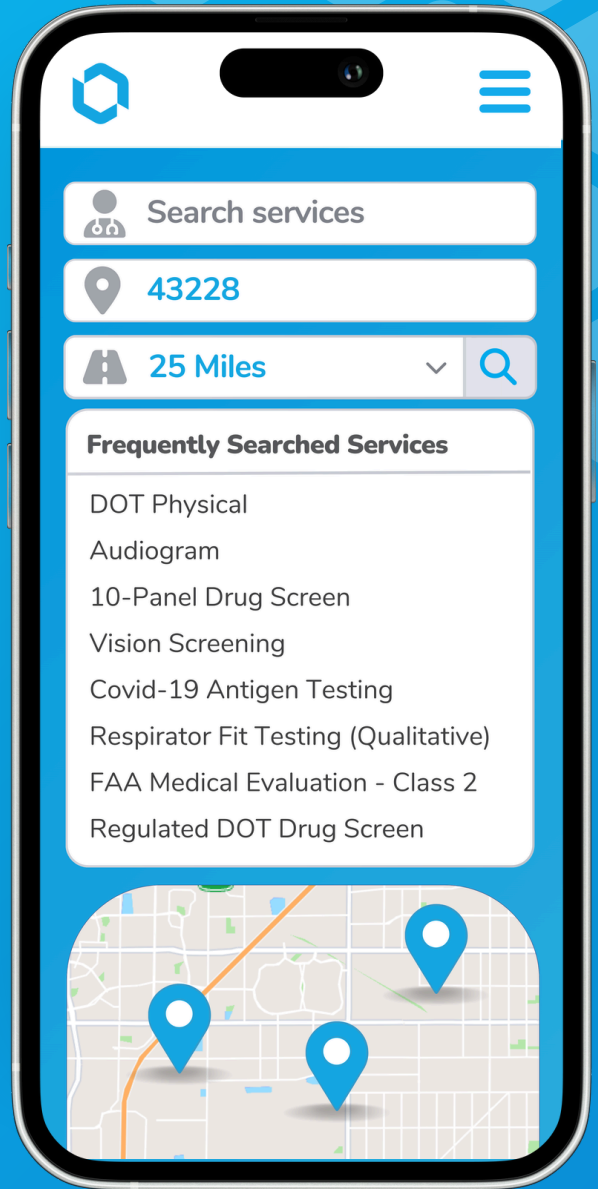
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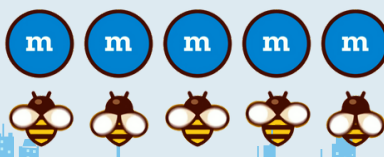
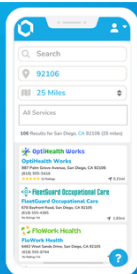


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JACOB POLLARD
HR Manager, Blue Jacket, Inc.



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