

# PREPARING FOR THE UNANNOUNCED OSHA INSPECTION

BY DR. SAM BARRY

Would your dental practice be able to survive a \$76,500 OSHA fine? That's the fine a dental office faced after just a single employee needlestick accident. The fine was severe because there was no written bloodborne pathogen exposure control plan, the injured employee was not sent for medical evaluation, and the source patient was not tested for hepatitis B, hepatitis C, and HIV.

This could have been avoided with OSHA preparation and compliance. While accidents happen and are unavoidable, a plan that initiates a proper response is the difference between an accident and a major OSHA violation. Being OSHA compliant is an important component for practice liability risk management.



Here is an overview of some general guidelines (not all inclusive) that I recommend to dental offices to help comply with OSHA regulations and maintain maximum safety.

1. Educate yourself on current OSHA regulations. Take an OSHA compliance class and/or enlist the help of someone trained in OSHA compliance.
2. Twenty-six states have their own state OSHA plan. Check to see if there are additional rules that your state OSHA plan may require.
3. Be compliant with local, state, and federal agencies that have rules and regulations that overlap with the OSHA regulations.
4. Designate someone to be in charge of OSHA compliance for the office.
5. Have an updated customized compliance manual that includes all of the required written plans, including accident prevention, emergency response, bloodborne pathogens exposure control plan, hazardous chemical communication plan, infection control plan, and tuberculosis plan. Employees should know where the manuals are located and have easy access to them.
6. Know the Bloodborne Pathogens Standard. Understand the hepatitis B vaccine requirements and the postexposure incident guidelines.
7. Maintain a current chemical inventory list and current safety data sheets. The safety data sheets must be maintained for products for at least 30 years from last day of use.
8. Make sure that any product that is removed from its original package is properly labeled.
9. Provide documented initial training for all **new** employees and annual training for **all** employees on all the OSHA standards that apply to dentistry and the hazards in your workplace. Keep records for at least three years.
10. Provide all the necessary personal protective equipment (PPE) for your employees at no cost to them. Train employees on the proper use, care, limitations, and disposal of PPE.
11. Proper first aid and emergency supplies and equipment should be available to trained employees. Inspect supplies monthly and document.
12. Follow the CDC "Guidelines for Infection Control in Dental Health Care Settings." Establish a written infection control plan for the practice and follow it.
13. Use only Food and Drug Administration (FDA) approved medical/dental devices and products.
14. Make sure to use disinfectants registered by the Environmental Protection Agency (EPA).
15. Follow the manufacturer's directions for the proper use and maintenance of all devices and products.
16. Have current required state and federal posters, signs, labels, forms, and logs displayed.
17. Conduct monthly safety meetings and document the topics and attendance. Depending on the number of employees and the state in which you practice, you may need a standing safety committee that meets monthly and keeps minutes.
18. Compile and securely maintain employee medical records, which must be maintained for 30 years from last day of employment.
19. Perform all the necessary monitoring/testing at the appropriate intervals and document the results. Examples of what should be monitored include sterilizers, first aid/medical emergency supplies, eyewash stations, smoke/fire alarms, fire extinguishers, dental unit water lines, nitrous oxide, and radiation.

A new requirement this year is training on a major modification to the OSHA Chemical Hazard Communication Standard. All employees are required to be trained by Dec. 1, 2013, on the Globally Harmonized System of classification and labeling of chemicals.

For more information, or for assistance with any of the above, contact a Henry Schein field sales consultant. These people are trained to help you achieve OSHA compliance. Be safe! **DE**

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