

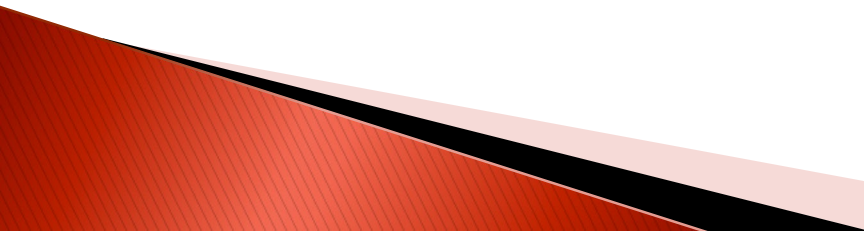


# Introduction to OSHA Standards

## Occupational Health and Safety Course for Healthcare Professionals

This training and related materials are provided under Susan Harwood Program grant number SH-19502-09-60-F-48 from the Occupational Safety and Health Administration U.S. Department of Labor. It does not necessarily reflect the views or policies of the U.S. Department of Labor, nor does mention of trade names, commercial products, or organizations imply endorsement by the U.S. Government.



# Objectives

- ▶ Recognize the background and history of OSHA standards.
  - ▶ Identify the role of the US Department of Labor and OSHA, the Code of Federal Regulations, and titles of the Federal Government.
  - ▶ Discuss the structure of the OSHA regulations for General Industry.
  - ▶ Describe how the purpose, scope, and process of OSHA regulations apply to healthcare settings.
- 

**Your experience with OSHA?**



# Background & History

- ▶ Williams-Steiger Occupational Safety and Health Act.
- ▶ Established and authorized in 1971.
- ▶ Aim: ensure employee safety and health in the US by working with employers and employees to create better working environments.
- ▶ Since OSHA's inception:
  - \* nonfatal occupational injury and illness rates:  42%
  - \* occupational fatality rates:  62%

***During this time the US workforce has doubled to over 100 million, with more than 7 million worksites.***

# Relationships & Definitions



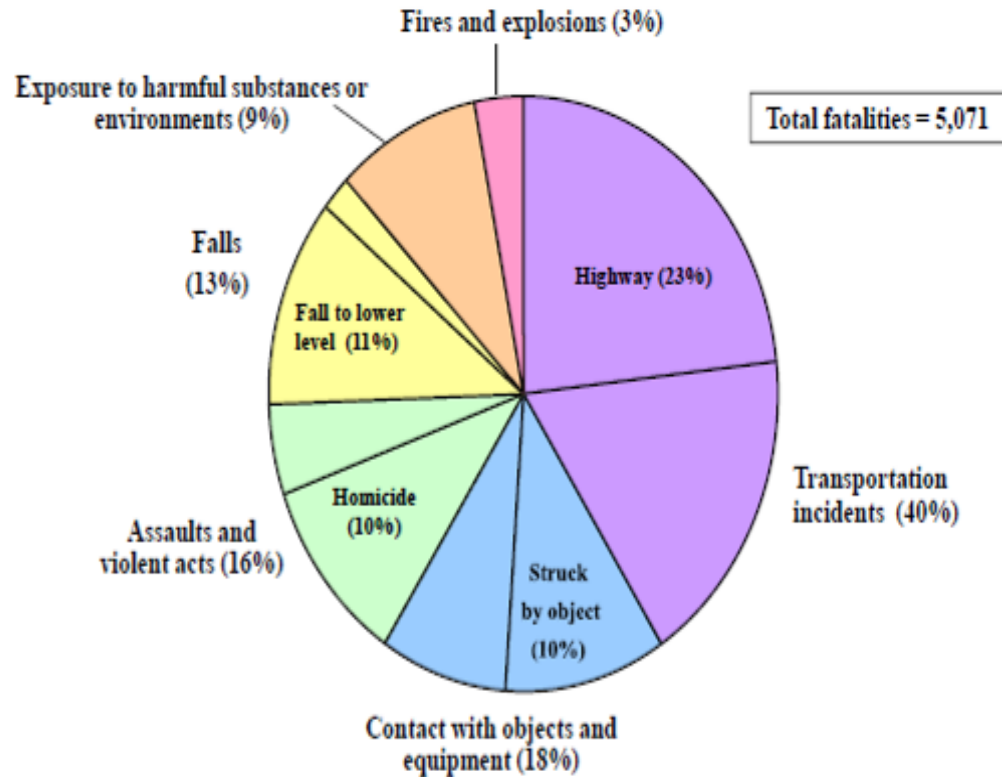
- ▶ OSHA is part of the U.S. Department of Labor.
- ▶ Directed by an Assistant Secretary of Labor for Occupational Safety and Health.
- ▶ Dr. David Michaels is the Assistant Secretary of Labor for Occupational Safety and Health.
- ▶ Department of Labor purpose:
  - \* Foster, promote, and develop the welfare of the wage earners of the United States;
  - \* Improve their working conditions;
  - \* Advance their opportunities for profitable employment.

# OSHA has an important role

- ▶ **5071** Americans died from workplace injuries in 2008; this is down from 5657 in 2007.
- ▶ **4.0 million recordable** non-fatal workplace injuries and illnesses occurred in 2007.
- ▶ **1.1 million days away from work** – 2007.

*OSHA is focused on enhancing the safety of workplaces and the health of all workers.*

## Manner in which workplace fatalities occurred, 2008\*



More work-related fatalities resulted from transportation incidents than from any other event. Highway incidents alone accounted for almost one out of every four fatal work injuries in 2008.

\*Data for 2008 are preliminary.

NOTE: Percentages may not add to totals because of rounding.

SOURCE: U.S. Bureau of Labor Statistics, U.S. Department of Labor, 2009.

# OSHA strategies

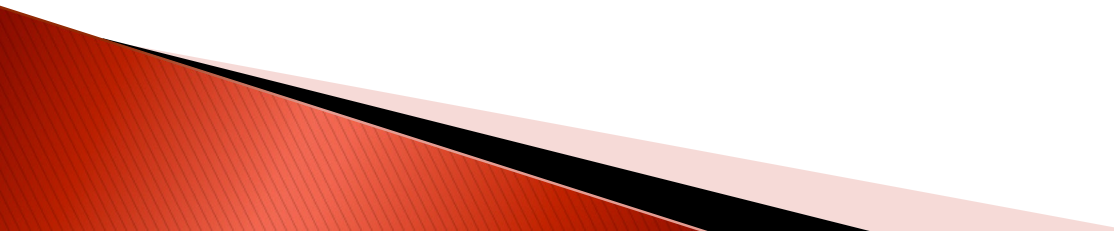
- ▶ Strong, fair, and effective enforcement.
- ▶ Outreach, education, and compliance assistance.
- ▶ Partnerships, Alliances, and other cooperative and voluntary programs.

## Key Focus:

***Work to help employers provide a safe working environment for all employees.***



# OSHA Purpose and Scope

- ▶ Requires, in part, that every employer covered under the Act furnish a place of employment that is free from recognized hazards that are causing or are likely to cause death or serious physical harm to employees.
  - ▶ Requires that employers comply with the OSHA standards, rules, regulations, and orders.
- 

# Impact

- ▶ When Employees stay safe and healthy:
  - \* better quality of work outcomes (patient outcomes!).
  - \* higher productivity.
  - \* lower worker's compensation costs.
  - \* fewer injuries/illnesses that require time off, replacement employees, and overtime.
  - \* reduced medical expenses.
  - \* overall, more satisfied employees.

# Code of Federal Regulations

- ▶ **29 CFR 1910 – Occupational Health and Safety Standards for General Industry**
- ▶ Standards that are either national consensus standards or federal standards already established by Federal statutes or regulations.



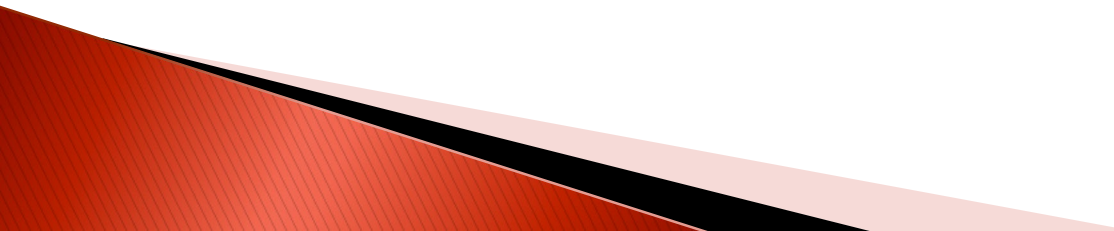
# Title 29 Chapter XVII



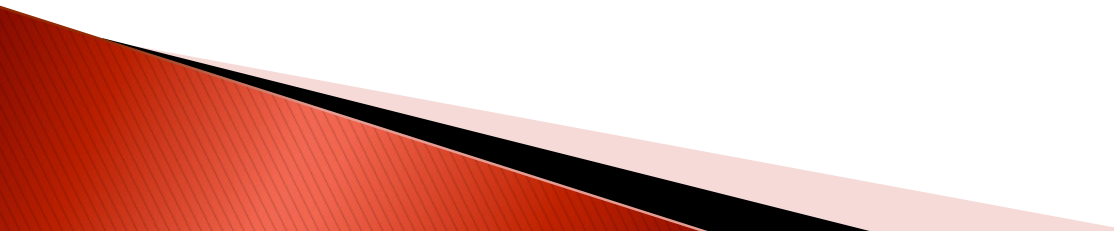
- ▶ Set aside for OSHA
- ▶ Regulations are broken down into Parts
- ▶ Part 1910, contains the General Industry Regulations.
- ▶ Each Part is then broken into major Subparts.



# 29 CFR 1910 Major Subparts

- ▶ Subpart J - General Environmental Controls
  - ▶ Subpart K - Medical and First Aid
  - ▶ Subpart L - Fire Protection
  - ▶ Subpart M - Compressed Gas
  - ▶ Subpart N - Materials Handling
  - ▶ Subpart O - Machinery and Machine Guarding
  - ▶ Subpart P - Tools
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# Major Subparts (cont)

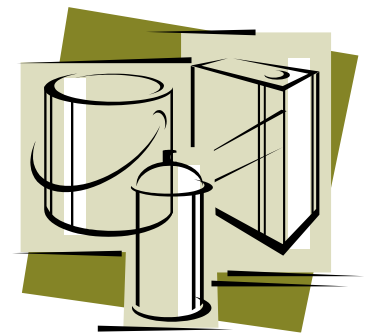
- ▶ Subpart Q - Welding, Cutting & Brazing
  - ▶ Subpart R - Special Industries
  - ▶ Subpart S - Electrical
  - ▶ Subpart T - Commercial Diving
  - ▶ Subpart Z - Toxic and Hazardous Substances
  
  - ▶ Each Subpart is then broken down into **Sections**
- 

# Federal Safety and Health Standards

- ▶ "Standard" means a statement(s) which requires conditions, or the adoption or use of one or more:
  - Practices,
  - Means,
  - Methods,
  - Operations, or
  - Processes, reasonably ***necessary to provide safe or healthful employment and places of employment.***

# Horizontal and Vertical Standards

- ▶ Some standards are horizontal meaning “general”, or “across the board”.
- ▶ Horizontal standards could apply *to any employer in any industry*.
- ▶ Example: the Hazard Communication Standard which covers the safe use of chemicals by workers who use them.





# Horizontal and Vertical Standards

- ▶ Vertical standards are specific to a particular industry:
  - Welding (1910.252)
- ▶ Standards that apply to the special industries covered in Subpart R of 1910 are examples of vertical standards, these include:
  - Textiles (1910.262)
  - Sawmills (1910.265)
  - Logging operations (1910.266)

# General vs. Specific Standards

- ▶ If a particular standard is specifically applicable to a condition, practice, means, method, operation, or process, it shall prevail over any different general standard which might otherwise be applicable to the same condition, practice, means, method, operation, or process.



# Incorporation by Reference

- ▶ Incorporation by reference was established by statute and allows Federal agencies to meet the requirement to publish regulations in the Federal register by referring to materials already published elsewhere.
- ▶ Incorporation by reference has the force of law.
- ▶ For example:  
National Fire Protection Association (NFPA),  
National Institute for Occupational Health & Safety (NIOSH), American National Standards Institute (ANSI),  
American Society of Mechanical Engineers (ASME).

# 1910.6 Incorporation by Reference

- The standards of agencies of the U.S. Government, and organizations which are not agencies of the U.S. Government which are incorporated by reference in this part, have the same force and effect as other standards in this part.
- ***Only the mandatory provisions (i.e., provisions containing the word "shall" or other mandatory language) of standards incorporated by reference are adopted as standards under the Occupational Safety and Health Act.***

# OSHA Inspections, Citations, Penalties

1903.2 (a)(1)

Each employer shall post and keep posted.....



**Job Safety and Health**  
**It's the law!**

**OSHA**  
Occupational Safety and Health Administration  
U.S. Department of Labor

**EMPLOYEES:**

- You have the right to notify your employer or OSHA about workplace hazards. You may ask OSHA to keep your name confidential.
- You have the right to request an OSHA inspection if you believe that there are unsafe and unhealthful conditions in your workplace. You or your representative may participate in that inspection.
- You can file a complaint with OSHA within 30 days of retaliation or discrimination by your employer for making safety and health complaints or for exercising your rights under the OSH Act.
- You have the right to see OSHA citations issued to your employer. Your employer must post the citations at or near the place of the alleged violations.
- Your employer must correct workplace hazards by the date indicated on the citation and must certify that these hazards have been reduced or eliminated.
- You have the right to copies of your medical records and records of your exposures to toxic and harmful substances or conditions.
- Your employer must post this notice in your workplace.
- You must comply with all occupational safety and health standards issued under the OSH Act that apply to your own actions and conduct on the job.

**EMPLOYERS:**

- You must furnish your employees a place of employment free from recognized hazards.
- You must comply with the occupational safety and health standards issued under the OSH Act.

This free poster available from OSHA –  
*The Best Resource for Safety and Health*

Free assistance in identifying and correcting hazards or complying with standards is available to employers, without citation or penalty, through OSHA's supported consultation programs in each state.

1-800-321-OSHA  
www.osha.gov

OSHA 1903.2 (a)(1)

The poster features several images: a person in a hard hat and safety glasses, a person in a white protective suit and mask, a forklift in a warehouse, a construction site with a crane, and a person sitting at a computer workstation.

# Processes

- ▶ **Inspections**: OSHA is authorized to enter any factory, plant, establishment, construction site, or other workplace to inspect and investigate .....
- ▶ In 2007, OSHA conducted 39,324 inspections.
- ▶ Inspection Priorities:
  - \* reports of imminent danger
  - \* fatalities or hospitalization of 3+ employees
  - \* employee complaints
  - \* referrals from other government agencies
  - \* targeted inspections

# Violations

- ▶ **Based on inspection data, citations are issued...from minor violation of standard, to willful violation, to egregious violation.**
- ▶ In 2008, in health services: 489 citations, based on 133 inspections, amounting to over \$258,000 in fines.

## Based on Science: Industrial Hygiene

- ▶ Industrial hygiene is the science of anticipating, recognizing, evaluating, and controlling workplace conditions that may cause workers' injury or illness.



# Industrial Hygienists involved in OSHA

- ▶ OSHA relies on, among many others, industrial hygienists to evaluate jobs for potential health hazards.
- ▶ They are involved in environmental monitoring and analytical methods to detect the extent of worker exposure and employ engineering, work practice controls, and other methods to control potential health hazards.
- ▶ More than 40% of OSHA compliance officers are industrial hygienists.



# Recordkeeping

- ▶ 29 CFR 1904.0 – 1904.46
- ▶ Requires employers to record and report work-related fatalities, injuries, and illnesses.
- ▶ Basic requirements: Must record each fatality, injury, and illness that:
  - (1) is work related; and
  - (2) is a new case; and
  - (3) meets one or more of the general recording criteria of 1904.7 or application to specific cases of 1904.8-1904.11

# Recordkeeping Goals

- ▶ Improve data
- ▶ Simplify forms and requirements
- ▶ Maximize use of computers
- ▶ Improve employee involvement
- ▶ Protect privacy

# General Recording Criteria

- ▶ Requires records to include any work-related injury or illness resulting in one of the following:
  - Death
  - Days away from work
  - Restricted work or transfer to another job
  - Medical treatment beyond first aid
  - Loss of consciousness
  - Diagnosis of a significant injury/illness by a physician or other licensed health care professional

1904.7(a)

# Work-Relatedness

- ▶ Cases are work-related if:
  - An event or exposure in the work environment either caused or contributed to the resulting condition
  - An event or exposure in the work environment *significantly* aggravated a pre-existing injury or illness

# Work-Relatedness

- ▶ Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment.
- ▶ A case is presumed work-related if, and only if, an event or exposure in the work environment is a discernable cause of the injury or illness or of a significant aggravation to a pre-existing condition. The work event or exposure need only be one of the discernable causes; it need not be the sole or predominant cause.

# Work-Related Exceptions

- ▶ Adds additional exceptions to the definition of work relationship to limit recording of cases involving:
  - eating, drinking, or preparing food or drink for personal consumption
  - common colds and flu
  - voluntary participation in wellness or fitness programs
  - personal grooming or self-medication



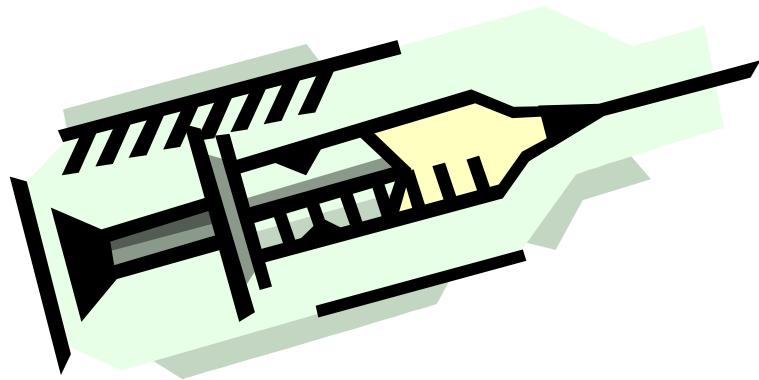
1904.5(b)(2)

# General Recording Criteria

- ▶ Includes definitions of medical treatment and first aid to simplify recording decisions.
- ▶ Clarifies the recording of “light duty” or restricted work cases.



# Recording Needlesticks



- ▶ Requires employers to record all needlestick and sharps injuries involving contamination by another person's blood or other potentially infectious material.

# Musculoskeletal Disorders

- ▶ Applies the same recording criteria to musculoskeletal disorders (MSDs) as to all other injuries and illnesses.
- ▶ Employer retains flexibility to determine whether an event or exposure in the work environment caused or contributed to the MSD.
- ▶ January 28, 2010: OSHA proposes recordkeeping change: putting the MSD column back on Form 300.



# Employee Involvement

- ▶ Have a system for reporting injuries and illnesses and inform employees.
- ▶ Workers and their representatives have a right to review the 300 Log.
- ▶ Workers, former workers and their representatives can get copies of Form 301 for their own injuries or illnesses.

# Records and Reports

- OSHA Forms 300, 300-A, and 301.
- May download forms and instructions from OSHA website
- Retain records for 5 years following the end of the calendar year that these records cover.

**OSHA**  
**Forms for Recording**  
**Work-Related Injuries and Illnesses**

**Dear Employer:**

This booklet includes the forms needed for maintaining occupational injury and illness records for 2004. These new forms have changed in several important ways from the 2003 recordkeeping forms.

In the December 17, 2002 Federal Register (67 FR 77165-77170), OSHA announced its decision to add an occupational hearing loss column to OSHA's Form 300, Log of Work-Related Injuries and Illnesses. This forms package contains modified Forms 300 and 300A which incorporate the additional column M(5) Hearing Loss. Employers required to complete the injury and illness forms must begin to use these forms on January 1, 2004.

In response to public suggestions, OSHA also has made several changes to the forms package to make the recordkeeping materials clearer and easier to use:

- On Form 300, we've switched the positions of the day count columns. The days "away from work" column now comes before the days "on job transfer or restriction."
- We've clarified the formulas for calculating incidence rates.
- We've added new recording criteria for occupational hearing loss to the "Overview" section.
- On Form 300, we've made the column heading "Classify the Case" more prominent to make it clear that employers should mark only one selection among the four columns offered.

The Occupational Safety and Health Administration shares with you the goal of preventing injuries and illnesses in our nation's workplaces. Accurate injury and illness records will help us achieve that goal.

*Occupational Safety and Health Administration*  
U.S. Department of Labor

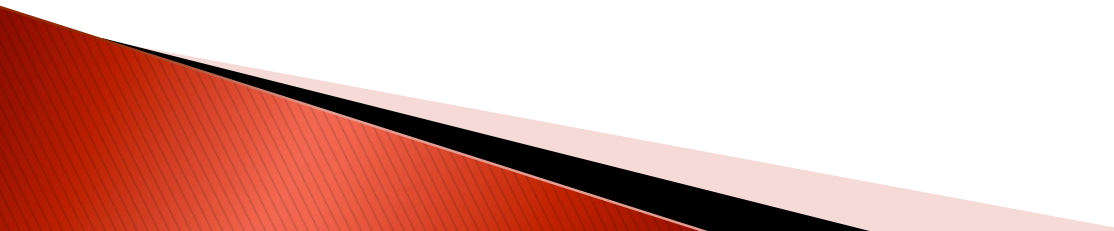
**What's Inside...**

In this package, you'll find everything you need to complete OSHA's Log and the Summary of Work-Related Injuries and Illnesses for the next several years. On the following pages, you'll find:

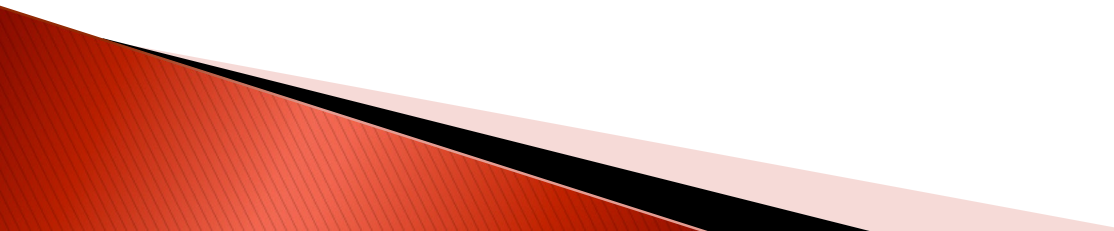
- ▼ **An Overview to Recording Work-Related Injuries and Illnesses** — General instructions for filling out the forms in this package and definitions of terms you should use when you classify your cases as injuries or illnesses.
- ▼ **How to Fill Out the Log** — An example to guide you in filling out the Log properly.
- ▼ **Log of Work-Related Injuries and Illnesses** — Several pages of the Log (but you may make as many copies of the Log as you need.) Notice that the Log is separate from the Summary.
- ▼ **Summary of Work-Related Injuries and Illnesses** — Removable Summary pages for easy posting at the end of the year. Note that you post the Summary only, not the Log.
- ▼ **Worksheet to Help You Fill Out the Summary** — A worksheet for figuring the average number of employees who worked for your establishment and the total number of hours worked.
- ▼ **OSHA's 301: Injury and Illness Incident Report** — A copy of the OSHA 301 to provide details about the incident. You may make as many copies as you need or use an equivalent form.

Take a few minutes to review this package. If you have any questions, visit us online at [www.osha-slc.gov](http://www.osha-slc.gov) or call your local OSHA office. We'll be happy to help you.

# Reporting Forms

- ▶ Form 301: Injury and Illness Incident Report
  - ▶ Form 300: Log of Work-Related Injuries and Illnesses
  - ▶ Form 300A: Summary of Work-Related Injuries and Illnesses
- 

# Form 301: Injury and Illness Incident Report

- ▶ Complete the form for each incident/illness event within seven days after receiving the information that there has been an occurrence.
  - ▶ Helps you to develop a picture of the extent of work-related incidents.
  - ▶ Protect confidentiality.
- 

# Form 300: Log of Work-Related Injuries & Illnesses

- ▶ Must keep a Log for each site – if more than one physical location for more than one year.
- ▶ Cases listed on the Log are not necessarily eligible for workers' compensation or other insurance benefits.
- ▶ Listing a case on the Log does not mean that the employer or worker was at fault or that an OSHA standard was violated.

# Form 300A: Summary of Work-Related Injuries and Illnesses

- ▶ Must complete this form even if no work-related injuries or illnesses occurred during the year.
- ▶ Must be authorized and signed by an executive.
- ▶ Must post the Summary by February 1<sup>st</sup> and keep it posted until April 30<sup>th</sup>.
- ▶ Retain all of these forms for 5 years.



# Reporting Requirements

- ▶ Within eight hours after the death of any employee from a work-related incident or the in-patient hospitalization of three or more employees as a result of a work-related incident.
- ▶ Must call the Area Office of OSHA, US Department of Labor, that is nearest to the site of the incident. Or call 1-800-321-OSHA.

***\*\*Must inform employees of how they are to report an injury or illness to you.***

# How does all this relate to healthcare?

- ▶ The standards apply to private sector healthcare settings
- ▶ The standards are very relevant, for example:
  - \* Toxic substances
  - \* Personal protective equipment
  - \* Work surfaces
  - \* Lifting/ergonomics
  - \* Fire Protection
  - \* Exit Routes, Emergency Action Plans, Fire Prevention Plans.

# Application to Healthcare Settings



- ▶ Safety and health are core to healthcare organizations.
- ▶ The safety and health of employees is critical to the success of any organization.
- ▶ Focus of OSHA is helping employers to create and sustain safe and healthy environments and protect employees from hazardous materials and situations.
- ▶ We can all benefit from understanding and complying with OSHA!



**Questions?**