



Top 10 OSHA Citations In The Healthcare Industry

By Tiffani Hiudt Casey

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Each year the Occupational Safety and Health Administration (OSHA) issues hundreds of citations to employers in the healthcare industry. While medical centers, doctors' offices, and clinics must all comply with a significant number of standards, the citations issued to hospitals remain relatively constant from year to year.

Not surprisingly, maintaining compliance with the Blood Borne Pathogens (BBP) standard presents a continuing challenge. Citations under the BBP standard are the most frequently cited in this industry. The other standards most frequently cited usually fall under Hazard Communication requirements. This past year was no different.

Your Main Areas Of Concern

For hospitals and medical centers, the most frequently cited standards (after BBP compliance) during the last half of 2011 were:

1. failure to train under the BBP standard;
2. failure to implement and maintain an Exposure Control Plan under the BBP standard;
3. failure to engineer out hazards/ensure hand washing under BBP standard;
4. poor housekeeping under the BBP standard;
5. failure to use personal protective equipment under the BBP standard;
6. failure to keep BBP training records and a Sharps Injury Log;

7. failure to implement and maintain a written Hazard Communication Program;
8. failure to provide Material Safety Data Sheets (MSDS) under the Hazard Communication standard; and
9. failure to ensure proper labeling of chemicals under the Hazard Communication standard.

For doctors' offices and clinics, the most frequent citations were:

1. failure to implement and maintain an Exposure Control Plan under the BBP standard;
2. failure to train under the BBP standard;
3. failure to engineer out hazards/ensure hand washing under BBP standard;
4. poor housekeeping under the BBP standard;
5. failure to implement and maintain a written Hazard Communication Program;
6. failure to make the Hepatitis B vaccination available under the BBP standard;
7. failure to prepare Exposure Determinations under the BBP standard;
8. failure to use personal protective equipment under the BBP standard;
9. failure to provide post exposure Hepatitis B vaccination under the BBP standard; and
10. failure to train employees under the Hazard Communication standard.

Using This Data Wisely

Employee exposure to safety and health hazards and the issuance of related OSHA citations can be expensive, so it's worth taking the time to avoid these issues by getting compliant with the OSHA standards and by reducing employee exposure. While full compliance with the standards can be difficult, there are steps you can take to minimize these hazards and avoid citations.

First, regularly audit your safety and health compliance by performing facility-wide and recordkeeping inspections and reviews. The focus of the audits should be in those areas where noncompliance is most likely. This includes not only OSHA's top 10 areas, but also areas specific to your facility.

For example, if you have had previous citations from OSHA, those standards cited should be a focus of the audit to prevent repeat citations. Review your first reports of injury, OSHA 300 Logs and workers' compensation records, to look for patterns of injuries related to potential infractions. Finally, perform walkthrough inspections, looking

for potential hazards and safety violations (and of course promptly correcting any problems).

Use information gathered from these audits for implementing new procedures and policies. For example, if you find that you are not properly updating MSDS sheets for new items, you may need to revise your product-intake procedures. Alternatively, you may discover that even though your procedure is adequate, responsible individuals are not performing their duties properly and require retraining, or even discipline.

Second, audit your training practices, especially in relationship to BBP and Hazard Communication. Failure-to-train citations are low-hanging fruit – just one missed employee can result in a citation. Additionally, no matter how much training is provided, employees often seem to develop amnesia when an OSHA compliance officer asks whether they have been trained in a specific area.

Avoid these issues by performing regular "refresher training"; informally asking employees about the training they've received; developing readily-available resources; and reviewing documentation to ensure the training records exist and are readily available if OSHA visits.

While not all hazards, and therefore not all potential for citations, can be eliminated, taking the above steps will go a long way in reducing the likelihood of their existence. More importantly, these steps are key elements in creating a safer working environment for healthcare employees.

The author may be reached at tcasey@laborlawyers.com or (404) 231-1400.