2017 VSHE Fall Safety Seminar
OSHA’s Top 10 Most Cited Standards for Healthcare FY’2017

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Grainger
Regulatory Agencies Environment of Care
CAUTION
IF YOU THINK
OSHA IS A
SMALL TOWN
IN WISCONSIN
YOU’RE IN
TROUBLE
With the Occupational Safety and Health Act of 1970, Congress created the Occupational Safety and Health Administration (OSHA) to assure safe and healthful working conditions for working men and women by setting and enforcing standards and by providing training, outreach, education and assistance.
Awareness of the Top 10 List?

- 64% Very familiar
- 34% Somewhat familiar
- 1% Somewhat unfamiliar
- 1% Not at all familiar
## OSHA Top 10 List*

### (Federal OSHA Inspections, FY2017)

| 1. | Fall Protection; General Requirements (1926.501) |
| 2. | Hazard Communication (1910.1200) |
| 3. | Scaffolding (1926.451) |
| 4. | Respiratory Protection (1910.134) |
| 5. | The Control of Hazardous Energy (1910.147) |
| 6. | Ladders (1926.1053) |
| 7. | Powered Industrial Trucks (1910.178) |
| 9. | Fall Protection – Training Requirements (1926.503) |

* Preliminary figures
Are Hospitals Safe?


- Nursing and residential care facilities (private industry) = 12.0
- Hospitals (state gov’t) = 8.1
- Psychiatric and substance abuse hospitals (private industry) = 8.1
- All industries including state and local gov’t = 3.3
- Construction = 3.6
- Manufacturing = 4.0

*injuries per 100 full-time workers; Source: Bureau of Labor Statistics
OSHA in Healthcare FY’2017

189 Federal inspections of Ambulatory Healthcare, Hospitals and Nursing/Residential Care Facilities

(5,564 hospitals in U.S., AHA Fast Facts on US Hospitals 2017)
NAICS Sector 62: The Health Care and Social Assistance sector comprises establishments providing health care and social assistance for individuals.
The Top 10 OSHA standards represent:

- 75% of all Federal OSHA healthcare citations
- 74% of all Federal OSHA penalties issued with citations
1. Bloodborne Pathogens
2. Hazard Communication
3. General Requirements (PPE)
4. Reporting fatalities, hospitalizations, amputations and losses of an eye to OSHA
5. Formaldehyde
6. Respiratory Protection
7. Electrical general requirements
8. Wiring methods, components and equipment for general use
9. Asbestos
10. The Control of Hazardous Energy (Lockout / Tagout)

Written exposure control plan (ECP)

Exposure determination with list of job classifications

**ECP updated annually**

Written schedule for cleaning

Hepatitis B vaccine for affected employees

Biohazard warning labels on waste containers and containers with blood/OPIM

**Training for affected employees**

Medical records maintained for employment plus 30 years

**Training records maintained for 3 years**

Sharps injury log maintained for 5 years

Written hazard communication program

Hazardous chemical list

Containers marked with identity and hazard description

Safety data sheet for each chemical; readily available

Safety data sheets follow 16-section OSHA format

Training for affected employees
Hazard Communication Program

• Five Components of a Hazard Communication Program:
  • Hazard Classification
  • Written Program
  • Labels
  • SDSs
  • Training
1. Signal Word:
Indicates relative level of hazard. “Danger” is used for most severe instances, while “Warning” is less severe.

2. Symbols (Hazard Pictograms):
Convey health, physical and environmental hazard information with red diamond pictograms. May use a combination of one to five symbols.

3. Product Name or Identifiers*

4. Hazard Statements:
Phrases that describe the nature of hazardous products and oftentimes the degree of hazard.

5. Precautionary Statements:
Phrases associated with each hazard statement, that describe general preventative, response, storage or disposal precautions.

6. Manufacturer Information:
Company name, address & telephone number.

*Additional Product Identifiers
<table>
<thead>
<tr>
<th>HCS Pictograms and Hazards</th>
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<tbody>
<tr>
<td><strong>Health Hazard</strong></td>
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<tr>
<td>- Carcinogen</td>
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<tr>
<td>- Mutagenicity</td>
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<tr>
<td>- Reproductive Toxicity</td>
</tr>
<tr>
<td>- Respiratory Sensitizer</td>
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<tr>
<td>- Target Organ Toxicity</td>
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<tr>
<td>- Aspiration Toxicity</td>
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<tr>
<td><strong>Flame</strong></td>
</tr>
<tr>
<td>- Flammables</td>
</tr>
<tr>
<td>- Pyrophorics</td>
</tr>
<tr>
<td>- Self-Heating</td>
</tr>
<tr>
<td>- Emits Flammable Gas</td>
</tr>
<tr>
<td>- Self-Reactives</td>
</tr>
<tr>
<td>- Organic Peroxides</td>
</tr>
<tr>
<td><strong>Exclamation Mark</strong></td>
</tr>
<tr>
<td>- Irritant (skin and eye)</td>
</tr>
<tr>
<td>- Skin Sensitizer</td>
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<tr>
<td>- Acute Toxicity</td>
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<tr>
<td>- Narcotic Effects</td>
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<tr>
<td>- Respiratory Tract Irritant</td>
</tr>
<tr>
<td>- Hazardous to Ozone Layer (Non-Mandatory)</td>
</tr>
<tr>
<td><strong>Gas Cylinder</strong></td>
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<tr>
<td>- Gases Under Pressure</td>
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<tr>
<td><strong>Corrosion</strong></td>
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<tr>
<td>- Skin Corrosion/Burns</td>
</tr>
<tr>
<td>- Eye Damage</td>
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<tr>
<td>- Corrosive to Metals</td>
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<tr>
<td><strong>Exploding Bomb</strong></td>
</tr>
<tr>
<td>- Explosives</td>
</tr>
<tr>
<td>- Self-Reactives</td>
</tr>
<tr>
<td>- Organic Peroxides</td>
</tr>
<tr>
<td><strong>Flame Over Circle</strong></td>
</tr>
<tr>
<td>- Oxidizers</td>
</tr>
<tr>
<td><strong>Environment</strong> (Non-Mandatory)</td>
</tr>
<tr>
<td>- Aquatic Toxicity</td>
</tr>
<tr>
<td><strong>Skull and Crossbones</strong></td>
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<tr>
<td>- Acute Toxicity (fatal or toxic)</td>
</tr>
</tbody>
</table>
Workplace Labeling

- GHS compliant label, or

- Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals

(Can continue to use NFPA or HMIS rating systems)
# Safety Data Sheet

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td><strong>Identification</strong> includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.</td>
</tr>
<tr>
<td>2</td>
<td><strong>Hazard(s) Identification</strong> includes all hazards regarding the chemical; required label elements.</td>
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<tr>
<td>3</td>
<td><strong>Composition/Information on Ingredients</strong> includes information on chemical ingredients; trade secret claims.</td>
</tr>
<tr>
<td>4</td>
<td><strong>First-Aid Measures</strong> include important symptoms/effects, acute, delayed; required treatment.</td>
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<tr>
<td>5</td>
<td><strong>Fire-Fighting Measures</strong> list suitable extinguishing techniques, equipment; chemical hazards from fire.</td>
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<tr>
<td>6</td>
<td><strong>Accidental Release Measures</strong> list emergency procedures; protective equipment; proper methods of containment and cleanup.</td>
</tr>
<tr>
<td>7</td>
<td><strong>Handling and Storage</strong> list precautions for safe handling and storage, including incompatibilities.</td>
</tr>
<tr>
<td>8</td>
<td><strong>Exposure Controls/Personal Protection</strong> list OSHA’s Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).</td>
</tr>
<tr>
<td>9</td>
<td><strong>Physical and Chemical Properties</strong> list the chemical’s characteristics.</td>
</tr>
<tr>
<td>10</td>
<td><strong>Stability and Reactivity</strong> list chemical stability and possibility of hazardous reactions.</td>
</tr>
<tr>
<td>11</td>
<td><strong>Toxicological Information</strong> includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.</td>
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<tr>
<td>12</td>
<td><strong>Ecological Information</strong> provides information to evaluate the environmental impact of the chemical(s) if it were released to the environment.</td>
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<tr>
<td>13</td>
<td><strong>Disposal Considerations</strong> provide guidance on proper disposal practices, recycling or reclamation of the chemical(s) or its container and safe handling practices. Will most likely refer reader to section 8 to minimize exposure.</td>
</tr>
<tr>
<td>14</td>
<td><strong>Transport Information</strong> provides guidance on classification information for shipping and transporting of hazardous chemical(s) by road, air, rail or sea.</td>
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<tr>
<td>15</td>
<td><strong>Regulatory Information</strong> identifies the safety, health and environmental regulations specific for the product that is not indicated anywhere else on the SDS.</td>
</tr>
<tr>
<td>16</td>
<td><strong>Other Information</strong> includes the date of preparation or last revision.</td>
</tr>
</tbody>
</table>

*Note: Since other Agencies regulate this information, OSHA will not be enforcing sections 12 through 15 (29 CFR 1910.1200(g)(2)). This information must be provided to meet GHS requirements for SDSs.*
Written certification of workplace hazard assessments

PPE maintained in sanitary and reliable condition

Training for users of personal protective equipment

(1) The employer must train employees before issuing PPE
- Each employee trained to know at least the following:
  - (i) When PPE is necessary
  - (ii) What PPE is necessary
  - (iii) How to properly don, doff, adjust, and wear PPE
  - (iv) The limitations of the PPE
  - (v) The proper care, maintenance, useful life and disposal of the PPE
(2) Workers must demonstrate an understanding of the training and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE.

(3) Verify that each employee has received and understood the required training through a written certification that contains:
- The name of each employee trained
- The date(s) of training
- Identifies the subject of the certification
Hierarchy of Controls

- **Elimination**: Physically remove the hazard
- **Substitution**: Replace the hazard
- **Engineering Controls**: Isolate people from the hazard
- **Administrative Controls**: Change the way people work
- **PPE**: Protect the worker with Personal Protective Equipment
Occupational fatalities reported within 8 hours to OSHA

Occupational injuries involving hospitalization, amputation, or loss of eye reported within 24 hours to OSHA
5. Formaldehyde (29 CFR 1910.1048)

Monitoring program
Engineering controls and work practices
Compliance program
Respirator program
Employee information and training
Medical Surveillance

Written respiratory protection program
Designated program administrator
Medical evaluations for respirator users

Annual fit-testing for users of respirators with tight-fitting face pieces

Training for respirator users

Periodic evaluations of respiratory protection program

Records of medical evaluations and fit-tests maintained
Electrical equipment free of damaged parts

Electrical equipment marked with manufacturer and rating

Disconnecting means for motors, appliances, and circuits marked with purpose

Clearance (3 ft) for <600v electrical equipment

Live parts (≥50v) guarded against accidental contact (cabinet, vault, 8 ft elevation, etc.)

“DANGER-HIGH VOLTAGE” signs for rooms or enclosures with live parts >600v
Temporary power and lighting used for renovations, maintenance, 90-day decorations, experiments, and emergencies only

Unused openings in cabinets closed

Junction boxes provided with covers

No live parts on appliances, fixtures, lamps, and receptacles

Ventilation for battery storage areas

No storage in transformer vaults

- Monitoring program
- Engineering controls and work practices
- Compliance program
- Respirator program
- Employee information and training
- Medical Surveillance
01/03/2017 - OSHA finds medical clinic exposed workers to asbestos hazards

- Provide basic **personal protective equipment** such as protective clothing.
- Create a **decontamination** area for employees to remove protective clothing before leaving the worksite.
- Use appropriate work methods to minimize asbestos exposure, such as using wet methods to keep asbestos fibers from becoming airborne and using local exhaust ventilation.
- Provide **respiratory protection**.
- Conduct exposure assessments.
- Provide medical surveillance to monitor potential exposure.
- Post signage on the boiler room and in other locations warning of known asbestos containing material.
- Inform workers on the location and use of **hazardous chemicals** in the facility.
10. Lockout / Tagout (29 CFR 1910.147)

General Procedures

Energy Control Program

Periodic inspection

Training

Authorized employee shall receive training in applicable hazardous energy sources
Inspection Guidance for Inpatient Healthcare Settings

- Musculoskeletal disorders related to lifting & handling
- Workplace violence
- Bloodborne pathogens
- Tuberculosis
- Slips, trips, and falls
- Other hazards
  - Multi-drug resistant organisms
  - Hazardous chemicals
OSHA News Release

• OSHA, New Jersey medical center reach agreement on violence prevention

• OSHA Investigation Finds Psychiatric Hospital Workers Remain Exposed to Serious Workplace Hazards $207,690 in proposed penalties
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<td>Ionizing Radiation</td>
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<tr>
<td>5.</td>
<td>16VAC25</td>
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<td></td>
<td>• 12 Virginia State inspections of healthcare facilities</td>
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<tr>
<td>6.</td>
<td>General Recording Criteria</td>
</tr>
<tr>
<td>7.</td>
<td>Retention and Updating</td>
</tr>
<tr>
<td>8.</td>
<td>Maintenance, Safeguards, and Operational Features for Exit Routes</td>
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<tr>
<td>9.</td>
<td>Sanitation</td>
</tr>
<tr>
<td>10.</td>
<td>Permit-Required Confined Spaces</td>
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</table>
Exit routes free of highly flammable furnishings and decorations
Exit routes free and unobstructed
Life safety equipment maintained in proper working order
Exit routes marked with “EXIT” signs
Exit routes maintained during construction and repairs
Buildings equipped with alarm system for fire and other emergencies
Completion of annual summary of injuries/illnesses (OSHA 300-A)

Certification of annual summary by company executive

Posting of annual summary Feb 1 – Apr 30
Emergency eye wash and shower equipment in areas with exposure to corrosives
OSHA Resources

Workplace safety also affects patient care. Manual lifting can injure caregivers and also put patients at risk of falls, fractures, bruises, and skin tears. Caregiver fatigue, injury, and stress are tied to a higher risk of medication errors and patient infections.

Tools & Resources

Click on the products below to learn more about worker safety in hospitals.

Get the Basic Facts
An executive summary for hospital administrators and others who want to learn more about who is getting injured, how they are getting hurt, how much it costs, and what hospitals can do to address the problem.

Get the Full Story
A factbook with detailed trend data that offers a comprehensive look at hospital worker safety.

How Safe Is Your Hospital?
A fillable questionnaire to help you gather key information from your facility, find out how safe your workplace is, how much your hospital spends on worker injuries and illnesses, what programs are in place to address the problem, and how you compare with other hospitals nationwide.
Virginia Department of Labor & Industry
Attention: Consultation Services
Main Street Centre
600 East Main Street, Suite 207
Richmond, Virginia 23219.

Consultation Services - (804) 786-8707 - Fax (804) 786-8418
The Cost of Healthcare Injuries

$15,860

Average workers’ compensation claim for a hospital injury between 2006 and 2011 (OSHA)
Grainger Safety Solutions – Align with OSHA Compliance

Click Resources to learn more
How is the Top 10 List Utilized?

- Enhance Training: 33%
- Assess and Benchmark Compliance: 29%
- Organizational Awareness: 23%
Thank You!

Virginia Society of Healthcare Engineers