

LAMMICO



E-OSHA KEEPING UP IN A CHANGING ENVIRONMENT

Your speaker for today is

**RON KENNEDY,
MHA, MJ, ARM, AIC
RISK MANAGEMENT CONSULTANT**



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UNITED STATES
DEPARTMENT OF LABOR



Find it in OSHA



Occupational Safety & Health Administration

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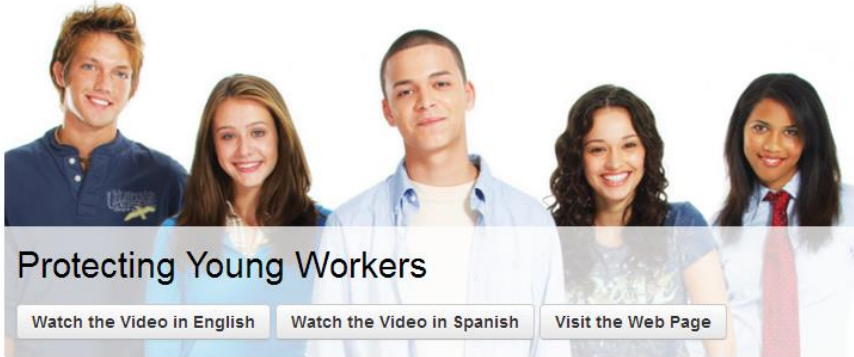
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Protecting Young Workers

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Workers

ention

lon Workers

Reporting Fatalities & Severe Injuries

IN FOCUS

en español

Know Your Rights!

Learn more



4,585 workers died on the job in 2013

and killed by 5/30/2015 TX: Raymundo Martines ele during power line removal.

Fatality Reports



"No one should have to sacrifice their life for their livelihood, because a nation built on the dignity of work must provide safe working conditions for its people."

— Secretary of Labor Thomas E. Perez

NEWSLETTER

OSHA QuickTakes

Subscribe today! See all issues.

NEWS

More News

July 28, 2015

OSHA issues proposed rulemaking clarifying the ongoing obligation to make and maintain accurate records of work-

HOW TO...

- File a complaint
- Get a FREE OSHA poster
- Get information on reporting severe work-related injuries, illnesses and fatalities to OSHA
- Get information on recordkeeping & reporting requirements
- Get help for employers
- Learn about temporary worker protections
- Find out if OSHA has inspected a workplace
- Find information on construction hazards
- Get help for clinicians
- Learn about partnerships and cooperative programs
- Find information on state plans
- Find an OSHA office
- OSHA's free on-site consultation program for

<https://www.osha.gov/>

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The screenshot shows the OSHA website header with the United States Department of Labor logo and a search bar. Below the header, there are navigation links for 'A to Z Index', 'En Español', 'Contact Us', 'FAQs', and 'About OSHA'. The main content area features a 'SHARE' button, 'OSHA QuickTakes' newsletter link, 'RSS Feeds', and a 'Was this page helpful?' star rating. The navigation menu includes 'Occupational Safety & Health Administration', 'We Can Help', 'What's New', 'Offices', and the OSHA logo. A secondary menu lists 'Home', 'Workers', 'Regulations', 'Enforcement', 'Data & Statistics', 'Training', 'Publications', 'Newsroom', 'Small Business', and 'Anti-Retaliation'. A link for 'Back to OSHA Enforcement' is visible. The memorandum is dated June 25, 2015, and is addressed to Regional Administrators and State Designees. It is from Dorothy Dougherty, Deputy Assistant Secretary, and is about inspection guidance for inpatient healthcare settings. The subject is 'Inspection Guidance for Inpatient Healthcare Settings'. The text of the memorandum states that it establishes guidance for inspections in inpatient healthcare settings, covering NAICS Major Groups 622 (hospitals) and 623 (nursing and residential care facilities). It mentions that all such inspections, programmed and unprogrammed, will cover focus hazards from the National Emphasis Program - Nursing and Residential Care Facilities, CPL 03-00-016 (NH-NEP). The hazards listed are: Musculoskeletal disorders (MSDs) relating to patient or resident handling, Workplace violence (WPV), Bloodborne pathogens (BBP), Tuberculosis (TB), and Slips, trips and falls (STFs).

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[Back to OSHA Enforcement](#)

June 25, 2015

MEMORANDUM FOR: REGIONAL ADMINISTRATORS
STATE DESIGNEES

FROM: DOROTHY DOUGHERTY
Deputy Assistant Secretary

SUBJECT: Inspection Guidance for Inpatient Healthcare Settings

This memorandum establishes guidance for inspections conducted in inpatient healthcare settings, North American Industry Classification System (NAICS) Major Groups 622 (hospitals) and 623 (nursing and residential care facilities). All such inspections, programmed and unprogrammed, will cover the focus hazards included in the recently-concluded National Emphasis Program - Nursing and Residential Care Facilities, [CPL 03-00-016](#) (NH-NEP):

- Musculoskeletal disorders (MSDs) relating to patient or resident handling,
- Workplace violence (WPV),
- Bloodborne pathogens (BBP),
- Tuberculosis (TB), and
- Slips, trips and falls (STFs).

- https://www.osha.gov/dep/enforcement/inpatient_insp_06252015.html

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Inspections within Industry

Reflects inspection data through 07/31/2015

This page enables the user to search for OSHA enforcement inspections within a specified industry group. Information may also be obtained for a [specified inspection](#) or inspections within a [specified establishment](#). See also search parameter [instructions](#).

The [NAICS](#) code has been collected for inspections since 2003. If selecting inspections within a specific industry prior to 2003, use a [SIC](#) specification.

Note: Please read [important information](#) regarding interpreting search results before using.

Search By:

SIC *2,3,4-Digit*

NAICS *2,3,4,5,6-Digit*

State

OSHA Office

Inspection Date :

Start Date

End Date

Other Options

<https://www.osha.gov/pls/imis/industry.html>

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Industry SIC Search Results

SIC	NAICS	Date Range	Office	State	Other Options
All	621111	08/04/2010 to 08/04/2015	All	LA	None

Please note that inspections which are known to be incomplete will have the identifying Activity Nr shown in italic. Information for these open cases is especially dynamic, e.g., violations may be added or deleted.

Sort By: [Date](#) | [Name](#) | [Office](#) | [State](#)

[Return to Search](#) ↻

By Date

Results 1 - 6 of 6

[Get Detail](#) [Select All](#) [Reset](#)

	#	Activity	Opened	RID	St	Type	Sc	SIC	NAICS	Vio	Establishment Name
<input type="checkbox"/>	1	962274.015	03/10/2014	0625700	LA	Complaint	Partial		621111	1	Chakkungal P. Devidoss, Md, Llc
<input type="checkbox"/>	2	962273.015	03/10/2014	0625700	LA	Complaint	Partial		621111	2	Michael Russo Md, Llc
<input type="checkbox"/>	3	962275.015	03/10/2014	0625700	LA	Complaint	Partial		621111		Meda Colvin, Md
<input type="checkbox"/>	4	463338.015	06/08/2012	0625700	LA	Planned	No Insp/Process Inactive		621111		Lake After Hours Corporate Office
<input type="checkbox"/>	5	314768094	01/11/2011	0625700	LA	Complaint	Partial	8011	621111	1	North Lake Medicine And Wellness Center, Llc
<input type="checkbox"/>	6	314767070	09/15/2010	0625700	LA	Complaint	Partial	8011	621111	3	Community Health Institute

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Inspection Detail

Case Status: OPEN

Note: The following inspection has not been indicated as closed. Please be aware that the information shown may change, e.g. violations may be added or deleted. For open cases, in which a citation has been issued, the citation information may not be available for 5 days following receipt by the employer for Federal inspections or for 30 days following receipt by the employer for State inspections.

Inspection: 962274.015 - Chakkungal P. Devidoss, Md, Llc

Inspection Information - Office: Baton Rouge

Nr: 962274.015	Report ID: 0625700	Open Date: 03/10/2014		
Chakkungal P. Devidoss, Md, Llc				
1111 Medical Center Blvd Suite South 555 Marrero, LA 70072		Union Status: NonUnion		
SIC:				
NAICS: 621111/Offices of Physicians (except Mental Health Specialists)				
Mailing: 1111 Medical Center Blvd Suite 555, Marrero, LA 70072				
Inspection Type:	Complaint			
Scope:	Partial	Advanced Notice:	N	
Ownership:	Private			
Safety/Health:	Safety	Close Conference:	03/10/2014	
		Close Case:		
Related Activity:	Type	ID	Safety	Health
	Complaint	874932	Yes	
	Complaint	874932		Yes

Case Status: OPEN

Violation Summary



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[En español](#)

Frequently Asked Questions

Bloodborne Pathogens

[What are the OSHA bloodborne pathogens standard requirements for post-exposure evaluation and follow-up from needlesticks and other exposure incidents?](#)

[What type of personal protective equipment \(PPE\) must employees in a dental office wear?](#)

[Are gloves required during phlebotomy procedures?](#)

[How do I dispose of regulated waste related to Bloodborne Pathogens?](#)

[Who must be offered the hepatitis B vaccination?](#)

[When must the hepatitis B vaccination be offered to employees?](#)

[Can pre-screening be required for hepatitis B titer? Post-screening?](#)

[Can the employer make up its own declination form for the hepatitis B vaccination?](#)

[Can employees refuse the hepatitis B vaccination?](#)

[Can the hepatitis B vaccination be made a condition of employment?](#)

[Is a routine booster dose of hepatitis B vaccine required?](#)

[Whose responsibility is it to pay for the hepatitis B vaccine?](#)

https://www.osha.gov/OSHA_FAQs.html





Dangerous Chemicals in the Workplace



Dangerous Chemicals in the Workplace



Dangerous Chemicals *Your* Workplace



Dangerous Chemicals *Your* Workplace

Examples of Hazardous Chemicals In Healthcare Environments

- Ethylene Oxide
- Ethyl Alcohol
- Ammonia
- Quaternary Ammonium Compounds
- Glutaraldehyde
- Formaldehyde
- Xylene
- Hazardous Drugs

Examples of Hazardous Chemicals In Healthcare Environments

- Ethylene Oxide
- Ethyl Alcohol
- Ammonia
- Quaternary Ammonium Compounds
- Glutaraldehyde
- Formaldehyde
- Xylene
- **Hazardous Drugs**

List of Hazardous Drugs—2014

- The NIOSH article makes specific reference to the MSDS—now referred to as SDS
 - “Check the MSDS or the proper handling section of the package insert;...If any of the documents mention
 - Carcinogenicity,
 - Genotoxicity,
 - Teratogenicity, or
 - Reproductive toxicity.
 - use the precautions stipulated...”

List of Hazardous Drugs—2014

- If a drug is determined to be hazardous, then appropriate precautions must be taken
 - Training is an essential precautionary element
 - List of hazardous drugs available in the NIOSH article in your handout
 - Current list available at
>www.cdc.gov/niosh/topics/hazdrug/
- Toxicological data often unavailable for investigational drugs
 - Handle as hazardous until proven otherwise

Prescription & OTC Drugs

- Exempt from coverage
 - A drug as defined by the Federal Food and Drug Act if it is in solid and final form for direct administration to a patient; drugs which are packaged by the manufacturer for sale to consumer in a retail business; and legal drugs brought to work environment by employee for personal consumption—to include first aid supplies.

Prescription & OTC Drugs

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 - www.osha.gov/html/faq-hazcom.html

Why the New Haz Com Standard?



- United Nations initiative
- Standardize warning terms and symbols
- Promote global commercial transactions
- Promote international worker safety
- Promote global environmental safety

OSHA Harmonizes Globally

- March 26, 2012 OSHA published in the *Federal Register* its revised Hazard Communication Standard (HCS)
 - OSHA's HCS was thereby “harmonized” with the Global system
- Transitioning between old HCS and new HCS
 - OSHA expects there to be a transition period in which the current HCS and the new HCS will overlap
 - A time when new labels & MSDSs will coexist with old ones
—this is acceptable in the short-run

OSHA Harmonizes Globally

- Timeline for Compliance

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 - May 25, 2012—final rule as published in *Federal Register* became effective

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 - December 1, 2013—all employees must be trained on new label elements and new format for Safety Data Sheets (SDSs) formerly referred to as Material Safety Data Sheets (MSDSs)

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 - December 1, 2015—compliance with all provisions of final rule

OSHA Harmonizes Globally

- Timeline for Compliance

- May 25, 2012—final rule as published in *Federal Register* becomes effective
- December 1, 2013—all employees must be trained on new label elements and new format for Safety Data Sheets (SDSs) formerly referred to as Material Safety Data Sheets (MSDSs)
- December 1, 2015—compliance with all provisions of final rule
- June 1, 2016—update any alternative workplace labeling hazard communication program as needed

OSHA Harmonizes Globally

- Good news for healthcare facilities, hospitals, medical clinics and physician offices
 - Only required to comply with requirements regarding establishing a written workplace program and communicating appropriate information to appropriate employees
 - No duty to independently analyze chemicals to determine whether or not it should be classified as a hazardous chemical
 - Employers can rely on data receive from suppliers

Hazard Risk Assessment

Hazard Risk Assessment

- OSHA expects all employers to perform work hazard risk assessment to identify work tasks that may expose employees to work place injury or illness.
- Who must classify chemicals?
 - Chemical/drug manufacturers and importers
 - If you process, formulate or repackage an identified hazardous chemical, then you are considered a chemical manufacturer

Hazard Risk Assessment

- What about consumer products?
 - OSHA exempts consumer products as defined in the Consumer Product Safety Act and said product is subject to the Consumer Product Safety Act
 - **If** used in workplace for the purpose intended by manufacturer of the product, **and**
 - Employee's duration and frequency of exposure is not greater than normally expected i.e. "home use"
 - What about bleach, etc.?
 - www.osha.gov/html/faq-hazcom.html



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www.OSHA.gov

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Frequently Asked Questions: Hazard Communication (HAZCOM)

1. [What are temporary agency employers required to do to meet HAZCOM requirements?](#)
2. [Can MSDSs be stored on a computer to meet the accessibility requirements of HAZCOM?](#)
3. [What are the container labeling requirements under HAZCOM?](#)
4. [How does HAZCOM apply to pharmaceutical drugs?](#)
5. [When is the chemical manufacturer required to distribute MSDSs?](#)
6. [What is considered proper training under the HAZCOM standard?](#)
7. [What are the requirements for refresher training or retraining a new hire?](#)
8. [Do you need to keep MSDSs for commercial products such as "Windex" and "White-Out"?](#)
9. [What are the requirements and limits to using generic MSDSs?](#)
10. [What is the application of HAZCOM to an office environment?](#)
11. [Is a material safety data sheet \(MSDS\) required for a non-hazardous chemical?](#)

Hazard Risk Assessment

- What about consumer products?
 - Employee's duration and frequency of exposure is not greater than normally expected i.e. "home use"
 - What about bleach, etc.?
 - OSHA has noted that it will not issue a citation unless the CSHO can establish that the consumer product was used other than as intended by manufacturer and duration/frequency greater than anticipated for average consumer

New Safety Data Sheets (SDS)

- Pictograms

Safety Data Sheets (SDS)

- Pictograms
- Major addition to traditional MSDS
- Use of pictogram and signal word
- Signal words indicate the relative degree of severity of a hazard. Signal words used in the GHS are:
 - Danger; used for the more severe hazards, and
 - Warning; used for the less severe hazards

SDS—PICTOGRAMS

Health Hazard



- **Carcinogen**
- **Mutagenicity**
- **Reproductive Toxicity**
- **Respiratory Sensitizer**
- **Target Organ Toxicity**
- **Aspiration Toxicity**

SDS—PICTOGRAMS

Flame



- **Flammables**
- **Pyrophorics**
- **Self-Heating**
- **Emits Flammable Gas**
- **Self-Reactives**
- **Organic Peroxides**

SDS—PICTOGRAMS

Exclamation Mark



- Irritant (skin and eye)
- Skin Sensitizer
- Acute Toxicity (harmful)
- Narcotic Effects
- Respiratory Tract Irritant
- Hazardous to Ozone Layer (Non-Mandatory)

SDS—PICTOGRAMS

Gas Cylinder



- **Gases Under Pressure**

SDS—PICTOGRAMS

Corrosion



- **Skin Corrosion/
Burns**
- **Eye Damage**
- **Corrosive to Metals**

SDS—PICTOGRAMS

Exploding Bomb



- **Explosives**
- **Self-Reactives**
- **Organic Peroxides**

SDS—PICTOGRAMS

Flame Over Circle



- **Oxidizers**

SDS—PICTOGRAMS

Environment
(Non-Mandatory)



- **Aquatic Toxicity**

SDS—PICTOGRAMS

Skull and Crossbones



- **Acute Toxicity
(fatal or toxic)**

Is this pictogram correct?

Health Hazard



- **Carcinogen**
- **Mutagenicity**
- **Reproductive Toxicity**
- **Respiratory Sensitizer**
- **Target Organ Toxicity**
- **Aspiration Toxicity**

Is this pictogram correct?

Flame Over Circle



• **Explosives**

Is this pictogram correct?

**Skull
and Crossbones**



- **Acute Toxicity
(fatal or toxic)**

Summary

- OSHA's new Hazard Communication Standard
 - No major changes for end users in healthcare
 - Employers responsible to train employees
 - Right to know
 - Right to understand
 - Documentation of successful training important
 - Documentation of employee understanding
 - Risk assessment first step to identify
 - Hazardous chemicals in workplace
 - Which employees actually or potentially exposed
 - Which employees need training, health monitoring etc

Summary

- OSHA's new Hazard Communication Standard
 - Training of all employees on new Globally Harmonized System (GHS)
 - Employees actually or potentially exposed to hazardous chemicals
 - Job specific risk assessment
 - Training deadline = December 1, 2013

Summary

- OSHA's new Hazard Communication Standard
 - Training must be workplace specific
 - Use your hazard risk assessment to customize your safety program
 - Test your system to make sure all chemical hazards have been identified
 - Verify that all employees needing training have been identified

New Haz-Com Std Training

- **OSHA's New Hazard Communication Standard: Preparing Hospitals for the 2013 Deadline**
- **Available at LAMMICO website**

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E-OSHA KEEPING UP IN A CHANGING ENVIRONMENT

Your speaker for today is
RON KENNEDY,
MHA, MJ, ARM, AIC
RISK MANAGEMENT CONSULTANT