



Complying with S&H Regulations in Healthcare

Identifying and correcting common hazards...

Compliance inspections...

Ergonomics and Safe Patient Handling



Most Frequently Cited OSHA Standards

<http://www.osha.gov/oshstats/index.html>

click on 'Frequently Cited OSHA Standards'

enter your facility SIC

hospital – 8062

nursing home – 8051

enter the state (i.e. MN) or 'federal' (for national stats)

SIC 8051: Skilled Nursing Care Facilities

Standard	#Cited	#Insp	\$Penalty	Description
<u>Total</u>	59	16	29355	
<u>19100146</u>	10	3	4880	Permit-required confined spaces
<u>19100151</u>	10	10	6793	Medical services and first aid.
<u>19100147</u>	8	5	4787	The control of hazardous energy (lockout/tagout).
<u>19101030</u>	5	3	150	Bloodborne pathogens.
<u>52050860</u>	5	5	3640	Machines With Revolving Parts, Securing, Guarding
<u>19100305</u>	4	3	2030	Wiring methods, components, and equipment for general use.
<u>19100212</u>	3	3	1960	General requirements for all machines.
<u>1820653</u>	2	2	0	
<u>19100132</u>	2	2	1505	General requirements.
<u>19100133</u>	2	2	0	Eye and face protection.
<u>19100219</u>	2	2	1640	Mechanical power-transmission apparatus.
<u>19100303</u>	2	2	1120	General requirements.
<u>19100023</u>	1	1	140	Guarding floor and wall openings and holes.
<u>19100134</u>	1	1	570	Respiratory Protection.
<u>19100138</u>	1	1	0	Hand Protection.
<u>19100333</u>	1	1	140	Selection and use of work practices

SIC 8062: General Medical & Surgical Hospitals

Standard	#Cited	#Insp	\$Penalty	Description
<u>Total</u>	22	4	12535	
<u>19100147</u>	4	2	1925	The control of hazardous energy (lockout/tagout).
<u>19100151</u>	4	4	4260	Medical services and first aid.
<u>1820653</u>	2	2	900	
<u>19100023</u>	2	1	1050	Guarding floor and wall openings and holes.
<u>19100134</u>	2	1	175	Respiratory Protection.
<u>19100036</u>	1	1	150	Design and construction requirements for exit routes.
<u>19100037</u>	1	1	900	Maintenance, safeguards, and operational features for exit routes.
<u>19100213</u>	1	1	500	Woodworking machinery requirements.
<u>19100303</u>	1	1	140	General requirements.
<u>19100335</u>	1	1	975	Safeguards for personnel protection.
<u>19101030</u>	1	1	560	Bloodborne pathogens.
<u>52050860</u>	1	1	700	Machines With Revolving Parts, Securing, Guarding
<u>52051200</u>	1	1	300	Inspection Requirements for Cranes and Hoists

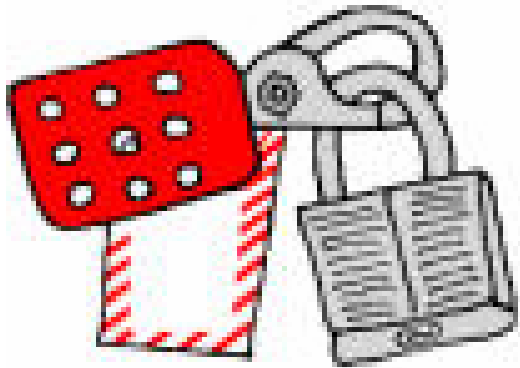
What Citations Your Facilities Have Received

- Eyewash availability – when potential for hazardous substance splash to eyes/face
 - comply with ANSI specs (one-step operation)
 - accessible
 - no obstructions
 - nozzles 33-45" above floor
 - proximity to the hazard
 - nozzles protected
 - tempered water
 - appropriate fluid rate / pressure
 - 0.4 gallons per minute for 15-minutes



What Citations Your Facilities Have Received

- Control of hazardous energy during maintenance / servicing of equipment (LOTO)



Hazardous energy control

- ✓ *specific energy control procedures*
- ✓ *certified record of training*
- ✓ *certified record of annual inspections*

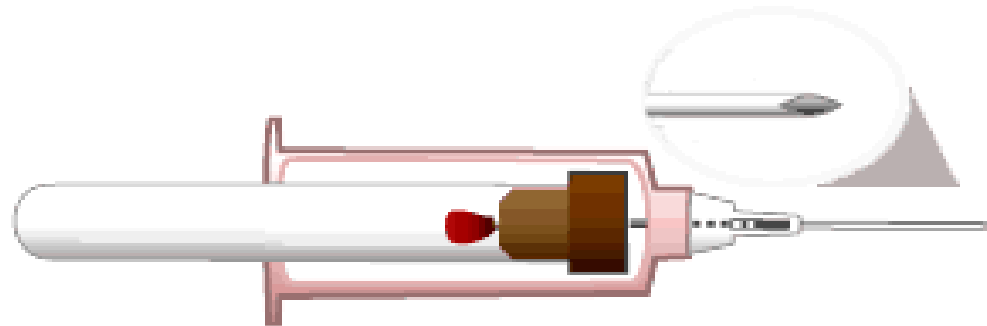
What Citations Your Facilities Have Received

- Confined space entry
 - ✓ Identify confined spaces
 - ✓ Permit system
 - ✓ Entry supervisor, attendant, entrants
 - ✓ Training
 - ✓ Emergency rescue
 - ✓ Alternate procedures / re-classifying...



What Citations Your Facilities Have Received

- Blood-borne pathogens
 - Not using safe medical devices (SESIP)



What Citations Your Facilities Have Received

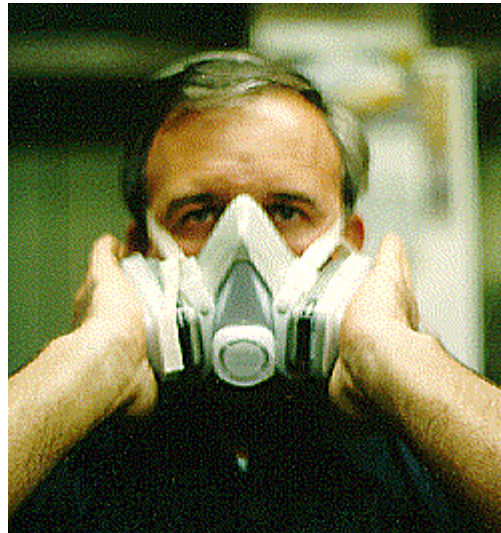
- Blood-borne pathogens
 - sharps containers: location, accessibility, maintenance (overfilled...)



- test for antibody to Hep-B surface antigen
- annual training
- ...etc.

What Citations Your Facilities Have Received

- Respiratory protection



Respiratory Protection Program

- ✓ *written SOP's*
- ✓ *medical evaluation*
- ✓ *training on use*
- ✓ *fit-testing*
(TB included)
- ✓ *review program effectiveness*

What Citations Your Facilities Have Received

- Machine guarding:
garbage disposal
Applies for openings
4" or greater...



What Citations Your Facilities Have Received

- Machine guarding:
mixer guard



apron caught...
(no guard)



What Citations Your Facilities Have Received

- Machine guarding:
 - fan blades
 - power transmission apparatus
 - rotating shafts
 - belts/pulleys



What Citations Your Facilities Have Received

- Electrical:
 - GFCI (for fixtures near a water source...)



What Citations Your Facilities Have Received

- Electrical:



- open conductors...
- labeling of circuit breakers



What Citations Your Facilities Have Received

- Electrical:
 - flexible cords used in place of permanent wiring



- missing ground pin on plug
- no strain-relief on electrical cords



- uncovered outlets...

What Citations Your Facilities Have Received

- PPE hazard assessment
 - eye / face protection
 - hand protection

✓ Certified hazard assessment

✓ Training





What Triggers an Inspection?

- Healthcare industry employers:
 - **higher injury rates** compared to other industries
(programmed inspections)
 - employer doesn't respond to employee concerns
 - inadequate hazard controls
 - exposure to harmful substances
 - serious injury or fatality incidents
 - observed situation that could immediately result in serious injury...



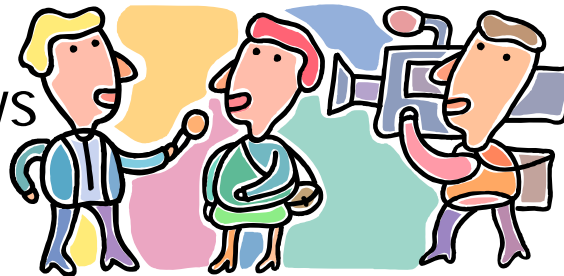
TYPES OF INSPECTIONS

(Oh S----- Here Again)

- IMMEDIATE DANGER
 - Observed or reported
- FATALITY / CATASTROPHE
 - Work-related death or hospitalization of 3 or more employees
- EMPLOYEE COMPLAINT
 - All formal complaints receive an onsite inspection
- PROGRAMMED / PLANNED
 - Routine inspection
- FOLLOW-UP
 - To verify that previously cited items are corrected
- REFERRAL
 - i.e. from media source, physician, ...

Inspection process

- Entry
- Opening Conference
 - purpose of inspection
- Walk-around
 - required programs review
 - hazard evaluation
 - employee interviews
- Closing Conference
 - review findings
 - discussion proposed citations
 - discuss abatement
 - methods
 - abatement timelines
 - employer rights





INSPECTION PROCESS

- **Common employee interview questions:**
 - When did you last receive RTK training?
 - and other applicable training
 - Does your employer provide you necessary with PPE?
 - Have you ever been injured at work?
 - Does the company manage worker safety effectively?
 - Do you have any safety/health concerns?
 - Specific questions on items observed in the work area (i.e. who operates that equipment, how do you perform your work task...?)

INSPECTION PROCESS

DO

- Be courteous
- Ask questions / get clarification
- Immediately correct hazards, if possible
- Take notes (& *pictures*)



DON'T

- Try try to lead the investigator out of certain areas
- Take the investigator into any potentially hazardous areas
- Don't provide more information than you're asked





What will the investigator ask for...?

- OSHA 300 Logs / 300A form / 1st reports of injury
- Required written programs
 - AWAIR (Safety) Program
 - Right-to-Know Program
 - Lock-out/tag-out
 - Exposure Control Plan (blood-borne pathogens, TB)
 - Respiratory Protection
- Training Records
- Required inspection records
 - fire extinguishing equipment
 - LOTO
 - emergency respirators (if applicable)
- Required medical monitoring (*related to toxic substance exposure*)
- Safety committee / safety meeting minutes
- other information they feel is pertinent to their investigation

QUESTION



Can a facility 'hazard-proof' itself as an effective way of managing workplace safety?

...past theory on accident causes

Heinrich



88%

UNSAFE ACTS

10%

UNSAFE CONDITIONS

This theory over-simplifies accident causation. Employees are put in a situation that requires them to make a decision on how the work will be performed. Without the proper equipment and knowledge resources, without expectations on how work will be performed, without the on-going surveillance of work activities... employees may perform tasks in a manner that increases the risk of injury.

**That's why we need a system to
manage workplace safety & health**



S&H Management System

- Management Leadership
- Employee Involvement
- Work-site Analysis
- Hazard Prevention & Control
- Education / Training

DO YOU THINK THAT SAFETY IS COMMON SENSE?



“COMMON SENSE IS NOT SO COMMON”



Knowledge resources...

- Recognition of safety and health hazards associated with the employees specific work tasks...
- Work task expectations – how it should be done...
 - Procedures, practices, and requirements of the employer's work site..."
 - The emphasis placed on personal safety
- Training on use of required equipment
- Understanding requirements of applicable S&H standards...

fewer injuries/illnesses

where people want to work

**Go beyond 'compliance-driven'
programs:**

Establish a management system because of
the more significant benefits...

cost savings
cost savings

better patient care

improved productivity



An effective S&H management system will maintain lower injury/illness rates

Isn't high injury rates one reason you have an OSHA inspection??

- Effective S&H management will provide the employees what they need to work effectively (knowledge, authority, equipment...)

The lack of needed resources are what can trigger an OSHA inspection!!



Safe Patient Handling

- The majority of injuries in health-care result from patient lifting and moving...
 - what have you done to limit the risk
 - do you know what's contributing to the risk
 - specific work area / patient conditions...
 - is appropriate equipment available and well-maintained
 - is equipment used
 - do employee feel SPH equipment is effective
 - do employees know how to use...



Safe Patient Handling

Moving beyond out-dated
methods