

OSHA Compliance

BY RICHARD L. BEST

The Occupational Safety and Health Administration pays particular attention to LTC facilities to ensure that they comply with safety and health standards. In a formal inspection of your facility, OSHA is likely to look at the following:

Ergonomics. Even though there is no standard related to ergonomics at this time, OSHA still has full enforcement authority in this area as a result of what is known as the “General Duty Clause” of the Occupational Safety and Health Act. OSHA wants to see evidence of:

- provision and use of proper lifts and other engineering controls
- initial and ongoing training by qualified instructors
- proper supervision and enforcement of safety practices.

OSHA’s Web site www.osha.gov/SLTC/ergonomics/resources.html provides links to many resources.

Exposure to blood and other potentially infectious materials. Develop a properly written bloodborne pathogens exposure control plan. Be sure to provide initial and annual training and document the following items in writing:

- annual review and update of the exposure control plan
- evaluation and implementation of safer medical devices
- involvement in and solicitation of input from non-managerial staff into the selection of safer medical devices
- annual training records
- Hepatitis B vaccination records
- declination forms for those employees who choose not to receive vaccinations
- post-exposure follow up records relating to any needlesticks or other sharps injuries
- sharps injury logs.

More resources on bloodborne pathogens are available at www.osha.gov/SLTC/etools/hospital/hazards/bbp/bbp.html.

Exposure to tuberculosis and other airborne transmissible diseases. Even though active TB disease levels in the U.S. are presently at their lowest level ever, there are still millions of Americans with latent TB infection. While most healthy immune systems can keep LTBI in check, long-term care residents often have diminished immune systems. For that reason, LTC facilities must always remain vigilant and plan in advance for how they will handle a resident who develops active TB disease.

The Centers for Disease Control and Prevention recommends eight basic steps for preventing the transmission of TB:

- Appoint a qualified TB administrator who will develop a TB exposure control plan.

- Conduct an assessment of the level of TB risk in your facility.
- Screen employees through tuberculin skin testing or other, more specialized, testing.
- Monitor residents.
- Use infection control practices.
- Train employees.
- Incorporate engineering controls, such as negative pressure isolation rooms, ultraviolet germicidal irradiation and proper ventilation.
- Use respiratory protection.

Resources on preventing TB transmission are available at: www.osha.gov/SLTC/etools/hospital/hazards/tb/tb.html#ProgramtoControlExposures.

Facilities in California should also be aware that a new Aerosol Transmissible Disease Standard 5199 has now been implemented in that state. This standard will cover not only tuberculosis, but also other airborne transmitted diseases.

Slips, trips and falls. Falls in workplaces account for many preventable injuries to workers and billions of dollars spent in workers compensation costs annually. Careful attention to basic safety precautions can pay tremendous dividends to your facility’s bottom line:

- Keep floors clean and dry wherever possible.
- Where wet floors are unavoidable, use mats or other engineering controls.
- Provide warning signs for any wet floor areas.
- Keep all areas clean and orderly.
- Keep aisles and passageways clear, in good repair and free of obstructions that could create a hazard.
- Use floor electrical outlets for equipment so that power cords need not be run across aisles or travel pathways.
- Keep exits clear of obstructions at all times.

Learn how to prevent slips, trips and falls at: www.osha.gov/SLTC/etools/hospital/hazards/slips/slips.html.

An effective injury and illness prevention program requires management commitment and employee involvement. This is the key to providing a safe and healthful workplace for your residents and employees. ■

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