How to Meet OSHA’s Employee Training Requirements

A Quick Guide for Medical, Dental, and Other Ambulatory Care Settings

A supplement to Medical Environment Update
Dear reader,

Survey responses and calls to the OSHA consultation hotline, which is a benefit of subscribing to Medical Environment Update, have shown that training your employees for compliance with OSHA standards is one of your major responsibilities. Indeed, keeping up with OSHA’s required employee training for a variety of individual standards can seem like a daunting task—especially considering that busy medical professionals are strapped with administrative and patient care duties.

With this in mind, I have decided to offer this special report that explains exactly what topics you need to cover when training employees and suggesting interesting ways to impart that information in medical practices, dental practices, and other ambulatory care settings.

Sheila Dunn, DA, MT (ASCP), and Sarah Alholm, MAS, recently of Quality America, are the authors of this special report. Their readership, which is very much like Medical Environment Update subscribers, found this quick guide helpful.

With the acquisition of Quality America and its OSHA compliance resources by HCPro earlier this year, I am pleased to offer this quick guide adapted for Medical Environment Update readers.

I hope you find this white paper a useful resource to the safety and health program in your workplace. Should you have a question not covered in this special report, don’t hesitate to call or e-mail me.

Sincerely,

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Introduction

Your facility’s designated OSHA safety officer is responsible for overseeing your employee training program. For some, OSHA standards training must include yearly retraining as well as new employee orientation.

Also, training must occur whenever changes such as modification of tasks or procedures or institution of new tasks or procedures affect the employee’s occupational exposure.

Medical Environment Update suggests conducting a brief, interactive session devoted to a safety issue at every staff meeting to keep safety at the forefront of employees’ minds and to remind them that management takes their job safety seriously. Provide all training sessions during work hours at no cost to the employee.

A physician or other qualified medical professional (e.g., a nurse, medical assistant, or laboratory technologist) may provide training, as long as he or she is competent in addressing questions pertaining to OSHA compliance. An infection control background is helpful, especially for bloodborne pathogens and TB training.

Training format

Educational formats, such as live presentations, videos, or interactive or noninteractive computer programs, may be used to fulfill yearly retraining of employees.

However, a qualified person must be available to answer questions during a discussion period.

Direct access by telephone may suffice in fulfilling this requirement, according to the OSHA letter of interpretation “Electronic Mail Systems and Bloodborne Pathogens Training Requirements,” but e-mail is not compliant unless the trainer is available to answer questions immediately. Be advised that if using computer programs or videos, the training must contain specific information that these formats cannot impart on their own.

For example, the training must include the precise location of:

➤ The OSHA manual and material safety data sheet binders
➤ Fire extinguishers, eyewash stations, and exit doors
➤ Personal protective equipment

Interactive safety training exercises

A good safety program involves not only management’s commitment, but employee involvement. Employees retain more information and adhere to safety procedures if safety training is interesting and interactive.

Medical Environment Update is a good source for tips, suggestions, exercises, and quizzes to incorporate training into your practice’s day-to-day operations. Also, the following suggestions can be included in employees’ annual training or serve to reinforce management’s commitment to safety at staff meetings.

General safety

➤ Demonstrate the location and operation of the eyewash stations
➤ Demonstrate the location of circuit breakers and describe procedures used in the event of electrical shock injury
➤ Identify the location of compressed gas cylinders and describe precautions regarding their use
➤ Describe the hazards of radioactive materials

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Interactive safety  < continued from p. 3

Fire safety
➤ Identify the location of fire extinguishers, and demonstrate or describe their use
➤ State the location of fire alarms
➤ Identify the location of evacuation routes
➤ Explain the procedures to follow in the event of a fire
➤ Participate in a mock fire drill

Bloodborne pathogens safety
➤ Describe the protocol for cleaning up a blood spill
➤ Describe the protocol for the disposal of sharps and used needles
➤ Locate the Exposure Control Plan
➤ Demonstrate aseptic removal of gloves
➤ Describe when to use personal protective equipment (PPE)

Chemical safety
➤ Locate the material safety data sheet binder, look up a hazardous chemical with which you work, and then:
   − State the primary route of entry for this chemical (e.g., skin, lungs, or eyes)
   − Discuss the symptoms of overexposure to this chemical
   − Identify the PPE and ventilation that is required when working with this chemical
   − Locate the PPE in the area
   − Identify where replacements are located

TB safety
➤ Role-play to prepare for which action to take when a potential TB patient enters the facility
➤ Discuss the effectiveness of current policies

Checklist for an effective safety training session

Safety presentations are not often very entertaining. Employees rarely expect to be amused or involved. The following tips help lead to a more effective presentation:

☑ Plan the event. Set objectives, limit the focus of your talk, and project your belief in the subject matter.

☑ Involve management. The training program will achieve its objectives only if management is committed to employee safety. Have a member of management in attendance to clarify policies.

☑ Be creative. Use audio, visual, role-playing, and hands-on material to increase employees’ retention of the information. Use techniques that best communicate to your specific employees.

☑ Demonstrate. Use props in cases in which it’s more effective to demonstrate the use of an item than explain it.

☑ Keep it moving. The most effective speakers move throughout the room. Create activities that involve the entire audience.

☑ Use employees as teachers. Let the audience relate the subject matter to real-world experiences. Listen to the examples offered and expand on them.

☑ Help employees buy in to the process. The best training information is worthless if employees do not see how it will benefit them. Use examples of specific on-site accidents to show the relevance of the program to their safety.

☑ Head off opposition. Use off-the-job examples if employees are resistant to being told how to do their work. Off-the-job examples drive the point across in a much less threatening way.

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If it’s been more than six months since you purchased or renewed your subscription to MEU, be sure to check your envelope for your renewal notice or call customer service at 800/650-6787.
Annual employee retraining

OSHA requires all affected employees (i.e., those who may be exposed) to be trained annually on the blood-borne pathogens standard. Federal OSHA does not require annual training on the hazard communication standard, but some state-administered occupational safety and health agencies do. Medical Environment Update recommends annual training on this standard to ensure the safety of employees in your workplace.

It also makes sense to include miscellaneous safety procedures, such as TB precautions, violence prevention, and fire safety. At least once per year, all employees should be shown the location and proper use of fire extinguishers, fire alarms, and exit routes.

Bloodborne pathogens annual training contents

OSHA states that you must cover these topics annually:

➤ Access to the written bloodborne pathogens safety policy. In addition to the policy in the OSHA safety manual, this also includes the exposure control plan and a copy of the bloodborne pathogens regulation, 1910.1030.

➤ An explanation of the signs and labels used in your workplace.

➤ A general explanation of the modes of transmission, epidemiology, and symptoms of bloodborne diseases (e.g., HBV, HCV, and HIV).

➤ An explanation of what constitutes an exposure incident and the procedure to follow if an exposure event occurs.

➤ A discussion of the limitations of the above practices to prevent or reduce exposure to bloodborne pathogens.

➤ Information on the types, proper use, location, removal, decontamination, and disposal of personal protective equipment (PPE).

➤ An explanation of methods to recognize tasks that may involve exposure to blood or other potentially infectious materials and the practices to prevent or reduce exposure.

➤ Information about the type of postexposure follow-up provided by the facility.

➤ An opportunity for employees to ask questions of the person conducting the training session.

Hazard communication annual training contents (recommended)

Medical Environment Update recommends that you train your employees annually on hazard communication to ensure their safety by addressing the following topics:

➤ The location of and/or how to access the written hazard communication program, including a copy of the hazard communication regulation, 1910.1200, and the material safety data sheet (MSDS) files

➤ How to protect against hazardous substances, including precautions to take and PPE to use

➤ Proper labeling of hazardous chemicals

➤ How to read and interpret MSDS and labels

➤ How to recognize whether they have been exposed (e.g., via visual appearance or smell)

➤ How to clean up a chemical spill

➤ What to do if exposure occurs

➤ How to report an accident or exposure

New-employee orientation

Reports from the Bureau of Labor Statistics have shown a high proportion of workplace accidents involving employees with less than one year of experience in a given workplace. This is why it is essential to orient new employees to routes of exposure in their new workplace and familiarize them with the protective devices you provide prior to placing them in situations that may expose them to hazardous chemicals or body fluids. It’s important not to assume new employees will know how to protect themselves from hazards in your workplace.

General safety knowledge from other facilities may not transfer to their current work situation. Employees must be trained about OSHA regulations as they pertain specifically to your facility.
Documenting employee training

Document initial and annual employee retraining on a training record form such as the sample provided on p. 7.

Include the date, type of training (e.g., video and seminar), subjects covered, and trainer’s name and qualifications. Employees should print their name and title and sign and date the form, indicating that they were trained.

You may also want to create a separate form for new employees to reflect the material covered in the “New-employee OSHA orientation checklist” above.

In any case, make sure you document initial and annual training sessions and retain all training records for at least three years.

Keeping up with OSHA’s required training and documenting is a daunting task, especially if your facility has multiple locations. To save you time and money, Medical Environment Update offers a variety of training video products specific to healthcare facilities.

These include:

- Bloodborne Pathogens Training Video
- Bloodborne Pathogens Training Video for Healthcare Support Services
- Needlestick Prevention Training Video
- Personal Protective Equipment Training Video
- Surface and Medical Instrument Decontamination Training Video
- Hazard Communication Standard Training Video
- Respirator Safety for Healthcare Workers

Editor’s note: For more information or to order videos, call 800/650-6787 or go to www.hcmarketplace.com.
**Employee training record form**

Type of training*: ___________________________________________________  Date:  __________________________________

Subjects covered**:  _______________________________________________________________________________________________
_________________________________________________________________________________________________________________

Trainer:  _________________________________________________ Title/qualifications:  ____________________________________

I have read and understood the safety procedures outlined in this facility’s OSHA safety manual. After the training session, I was given the opportunity to ask questions to clarify the material. I will, to the best of my abilities, make every effort to practice these safety policies in order to reduce health risks to my coworkers, our patients, and myself.

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*Video, seminar, etc. If the employee attended a seminar, attach the seminar description to this form.

**Bloodborne pathogens, HazCom, TB, fire safety, etc.

Source: OSHA Regulatory Manual for Healthcare, HCPro, Inc.