



OSHA Compliance for Healthcare Practices

Safety is the top goal in any healthcare practice, and complying with Occupational Safety and Health Administration (OSHA) standards is crucial to minimizing potential workplace incidents and keeping providers and patients safe. OSHA standards — including the Hazard Communication Standard, the Bloodborne Pathogens Standard, the Personal Protective Equipment (PPE) Standard, and the Ionizing Radiation Standard — are federal regulations for healthcare practices to protect their employees from risk and health hazards they may encounter daily.

Additionally, OSHA regulations include provisions regarding ergonomics; slip and fall considerations and potential hazards; workplace violence; influenza, tuberculosis, and other infectious diseases; emergency response; patient handling; chemical hazards; and other hazards, including compressed gas, lasers, and latex allergies.¹ OSHA responds to complaints and inspects healthcare practices for compliance. If OSHA cites deficiencies, then healthcare practices might be fined and required to remedy them to be in compliance.

This checklist can serve as a helpful tool to evaluate healthcare practices' compliance protocols and duties as well as identify any deficiencies that need to be addressed.²

	Yes	No
Exposure Control Plan		
Does your healthcare practice maintain and update annually its exposure control plan that addresses the following:		
A copy of the bloodborne pathogens regulation?		
 Identification of employees at risk of exposure and what puts them at risk? 		
 Identification and use of engineering controls? 		
 Identification and use of work practice controls (procedures that reduce risk of exposure)? 		

	Yes	No
Exposure Control Plan (continued)		
Hazard communication and training?		
Postexposure protocols?		
 Proper containment of all regulated waste, including waste disposal methods and procedures? 		
 Use of labels or color-coding for items such as sharps disposal boxes and containers for regulated waste, contaminated laundry, and certain specimens? 		
Housekeeping and laundry methods?		
 Recordkeeping requirements, including reporting fatality, injury, and illness information to OSHA? 		
 Requirements for personal protective equipment (PPE) and how to use it? 		
 Consideration, implementation, and use of safer engineered needles and sharps? 		
 Hepatitis B vaccination protocols for pre-exposure and postexposure control? 		
 Medical follow-up in the event of an exposure incident? 		
Compliance With the Hazard Communication Standard		
Does your healthcare practice maintain a written hazard communication program?		
Does your healthcare practice maintain a list of hazardous chemicals (such as alcohol, disinfectants, anesthetic agents, sterilants, and mercury) and update it as new chemicals are purchased?		
Are Safety Data Sheets from the manufacturers of all chemicals used or stored at the healthcare practice available for employees at all times?		
Are chemical labels properly affixed to any containers with chemicals?		
Are employees trained to understand these labels and how to handle chemicals?		
Does your healthcare practice ensure all employees receive information about the identities and hazards of certain chemicals found to be hazardous?		

	Yes	No
Compliance With the Bloodborne Pathogens Standard		
Does your healthcare practice ensure all employees, including part-time employees, are trained on blood and infectious material exposure annually regardless of their prior training or education?		
Does your healthcare practice provide safety devices and education to decrease the number of contaminated-sharps incidents from needles, scalpels, broken glass, or other sharp devices?		
Compliance With the Personal Protective Equipment Standard		
Are all staff provided with PPE, including clean and reliable face masks, face shields, protective gloves, gowns, and aprons?		
Does your healthcare practice ensure that all PPE fits each employee correctly?		
Does your healthcare practice train employees on PPE in terms of what equipment is necessary; when it should be used; how it should be worn; and how to care for, maintain, and dispose of it?		
Are healthcare employees trained on the limitations of PPE?		
Compliance With the Ionizing Radiation Standard		
Does your healthcare practice maintain a survey of the types of radiation used in the facility, including X-rays?		
If your healthcare practice has an X-ray machine, is the area where the machine is located designated, controlled, and indicated as a restricted area to reduce exposure?		
Are rooms that contain X-ray equipment labeled with caution signs?		
Are healthcare employees provided with shields and PPE as well as personal radiation monitors, such as film badges or dosimeters?		
Are X-ray machines clearly labeled as radioactive source equipment with warnings about necessary caution?		

	Yes	No
Training Requirements		
Is all OSHA training for employees documented to provide proof of compliance?		
Does OSHA training documentation include training dates, training content, names/job titles of attendees, and trainer names and their qualifications?		
Does the healthcare practice maintain employee training records per OSHA guidance and make them available to employees?		
Recording and Reporting Occupational Injuries and Illnesses		
Is your healthcare practice aware of the basic requirements for recording and reporting occupational injuries and illnesses?		
Are occupational injuries and illnesses recorded and/or reported if they:		
• Result in death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness.		
 Involve a significant diagnosed injury or illness (e.g., cancer, chronic irreversible diseases, fractured or cracked bones, or punctured eardrums), even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness? 		
Are work-related injuries that led to death reported within 8 hours, and are injuries that resulted in amputation, loss of an eye, or hospitalization reported within 24 hours?		
Is the OSHA poster (Publication 3165) or an equivalent state plan document displayed at the healthcare practice to explain employee rights in regards to a safe workplace and to provide information on how to file a complaint? Is the poster/document posted in a visible place where employees can see it?		
Electrical Hazards		
Is all electrical equipment free from recognized hazards?		
Is high-voltage equipment labeled and locked?		
Is the healthcare practice complying with OSHA's wiring and use of electrical equipment requirements?		

	Yes	No
Exit Routes Standards		
Are exits clearly marked at the healthcare practice?		
Do the employees know how to leave the building in case of an emergency?		
Are the number of exits sufficient for the number of employees at the healthcare practice?		
Is a diagram of evacuation routes posted in a visible location?		
Does the healthcare practice have signage for these exits?		

Resources

- Occupational Safety and Health Administration: OSHA Injury and Illness Recordkeeping and Reporting Requirements
- Occupational Safety and Health Administration: Safety and Health Topics: Bloodborne Pathogen and Needlestick Prevention
- Occupational Safety and Health Administration: Safety and Health Topics: Electrical
- Occupational Safety and Health Administration: Safety and Health Topics: Hazards Communication
- Occupational Safety and Health Administration: Safety and Health Topics: Ionizing Radiation
- Occupational Safety and Health Administration: Safety and Health Topics: Personal Protective Equipment

Endnotes

¹ Gamma Compliance Solutions. (2021, February 11). OSHA compliance checklist for medical offices. Retrieved from https://www.oshamanual.com/compliance101/article/osha-compliance-checklist-for-medical-offices

² 29 CFR Part 1910.1030; 29 CFR Part 1904.7; 29 CFR Part 1910.1200; 29 CFR Part 1910 Subpart I; 29 CFR 1910.1096; 29 CFR Part 1904.39; 29 CFR Part 1910 Subpart S; 29 CFR Part 1910 Subpart E; Gamma Compliance Solutions, OSHA compliance checklist for medical offices; Occupational Health and Health Administration. (n.d.). Hazard communication. Retrieved from www.osha.gov/hazcom; Occupational Health and Health Administration. (n.d.). Bloodborne pathogens and needlestick prevention. Retrieved from www.osha.gov/bloodborne-pathogens/general; Spin Compliance Solutions. (n.d.). OSHA compliance. Retrieved from www.spincompliance.com/osha-compliance/; Occupational Safety and Health Administration. (2015). *Training requirements in OSHA standards*. Retrieved from www.osha.gov/sites/default/files/publications/osha2254.pdf; Occupational Health and Safety Administration. (n.d.). OSHA

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