Know the OSHA standards to prevent violations

OMSs should keep abreast of the most up-to-date OSHA standards to ensure compliance and safety in the practice.

Q What are the most frequently cited OSHA violations in dental practices?

A According to the U.S. Department of Labor, the two most frequently cited standards by federal OSHA for North American Industry Classification System (NAICS) Code 621210 (health practitioners with DMD, DDS or DDsc. Degrees) from October 2023 through September 2024 are:

- OSHA Bloodborne Pathogens standard 29 CFR 1910.1030
- OSHA Hazard Communication standard 29 CFR 1910.1200

For more information, visit OSHA.gov/ords/imis/citedstandard.html.

Q Did OSHA increase its penalties for workplace safety and health standards violations?

A The Federal Civil Penalties Inflation Adjustment Act, as amended in 2015, requires annual inflation adjustments to civil monetary penalties each Jan. 15. Effective Jan. 15, 2025, OSHA increased its maximum penalties for workplace safety and health violations as follows:

- Serious, other-than-serious and posting requirements: $16,550 per violation
- Failure to abate: $16,550 per day beyond the abatement date
- Willful or repeated: $165,514 per violation

For more information, visit OSHA.gov/penalties.

Q What does a practice need to do to comply with the OSHA Bloodborne Pathogens standard?

A OSHA's Bloodborne Pathogens standard outlines requirements for employers to protect workers occupationally exposed to blood and other potentially infectious materials (OPIM). OMS practices must have a written exposure control plan (ECP) and practice universal precautions. The ECP should list job classifications and tasks that may result in an exposure and be updated annually.

OSHA requires that staff with occupational exposure receive training upon initial assignment, at least annually thereafter, and when new or modified tasks or procedures affect a worker's exposure. Training must include supplying workers with a manual of the current OSHA Bloodborne Pathogens standard, an explanation of the manual, the exposure control plan,

procedures for exposure incidents, post-exposure evaluations and information on the hepatitis B vaccine's efficacy, safety and benefits. The ECP must detail protection measures for staff and outline how these measures will be used. Employers must specify how they will implement practice controls, personal protective equipment, training and other OSHA-mandated requirements.

For more details, visit OSHA.gov/bloodborne-pathogens/general.

Q What is the OSHA Hazard Communication Standard, and how does our practice comply with it?

A OSHA's Hazard Communication Standard requires employers with hazardous chemicals in their workplaces to implement a hazard communication program. To create an effective program, OMS practices should follow these steps:

- **Learn the standard:** Identify responsible staff to address all necessary components and activities, such as training.
- **Prepare and implement a written program:** Include a list or inventory of all hazardous chemicals in the office.
- **Label containers correctly:** Ensure office containers are labeled correctly and keep labels on shipped containers.
- **Maintain safety data sheets (SDSs):** Keep SDSs for each hazardous chemical and ensure they are readily accessible to employees.
- **Inform and train staff:** Educate employees on the hazardous chemicals in their work area before initial assignment and when new hazards are introduced.
- **Review and revise:** Periodically examine the hazard communication program and update as appropriate.

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For more detailed information, practices can access the guide Hazard Communication: Small Entity Compliance Guide for Employers That Use Hazardous Chemicals at OSHA.gov/sites/default/files/publications/OSHA3695.pdf or visit OSHA.gov/hazcom.

Q Where are available OSHA resources and training materials for OMS practices and staff?

A OSHA provides several resources and training materials on its website, including:

- Medical & Dental Offices: A Guide to Compliance with OSHA Standards
- Model Plans and Programs for OSHA Bloodborne Pathogens and Hazard Communications Standards

Both can be found at OSHA.gov/bloodborne-pathogens/resources. ■

This article is provided for informational purposes and not intended as legal advice or as replacing consultation with an attorney.

Additional OSHA resources available

The AAOMS Store offers the publication *Model Medical Practice OSHA Exposure Control Compliance Plan and Training* that provides a comprehensive guide to meeting annual OSHA requirements in the OMS practice. The resource includes a print manual and a USB drive containing a narrated PowerPoint presentation training module for staff.

In addition, AAOMS CE Online offers the following webinars regarding OSHA and safety protocols:

- You're in Charge of OSHA and Infection Control – Now What?
- Help! OSHA is Here: What do I do Now?
- Needlestick and Sharps Injuries: Risks, Management and Safety Protocols

Visit AAOMSstore.com and AAOMS.org/CEonline to learn more.