

Complying with OSHA Requirements

“Will this class meet my OSHA requirements?” This question, in various forms, is asked on a frequent basis – and it is a legitimate, but almost impossible question to answer. OSHA requires every dental office to evaluate the potential occupational hazards in their individual office and devise a plan to inform employees and train them to protect themselves and prevent accidental exposure. Hazards can include the more well-known (i.e., bloodborne pathogens, etc.) to the overlooked (i.e., slippery walking surfaces, etc.). Some require annual hazard training, some ask for one time only, and others can be covered with a well-placed poster.

The only way to answer that question would be to review the written exposure control plan at your office, and based upon the job classification you should be able to determine exactly what exposures the employee might have. From there you can determine what type of training is necessary to meet the employee’s right to know. Only a careful review of the specific training class and course materials will allow you to decide if the class meets your or your employee’s needs.

Because virtually every dental office has some exposure to bloodborne pathogens, the following are some important rules regarding Employee Right To Know training necessary for compliance with the Enforcement Procedures for the Occupational Exposure to Bloodborne Pathogens Standard, 29 CFR 1910.1030. Information provided by the Minnesota Department of Labor and Industry.

- The employer shall ensure that all employees with occupational exposure participate in a training program which must be provided at no cost to the employee and during working hours.
- The training shall be provided:
 - At the time of initial assignment to tasks where occupational exposure can occur;
 - At least annually thereafter.
 - Additional training shall be provided when tasks are modified or new procedures affect the employee’s occupational exposure.
- Training Program Elements:
 - An accessible copy of the standard and explanation of its contents;
 - A general explanation of the epidemiology and symptoms of bloodborne diseases;
 - An explanation of the modes of transmission of bloodborne pathogens;
 - An explanation of the employer’s written Exposure Control Plan and how employees can obtain a copy;
 - An explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood or OPIM;
 - An explanation of the use and limitations of methods that will prevent or reduce exposure including appropriate engineering controls, work practices, and PPE.
 - Information on the types, proper use, location, removal, handling, decontamination and disposal of PPE.
 - An explanation of the basis for selection of PPE;

- Information on the Hepatitis B vaccine, including information on its efficacy, safety, methods of administration, the benefits of being vaccinated, and that the vaccine and vaccination will be offered free of charge;
- Information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM;
- An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available;
- Information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee experiencing an exposure incident;
- An explanation of the signs and labels and/or color coding required and used in the facility; and
- An opportunity for interactive questions and answers with the person conducting the training session.
- The person conducting the training shall be knowledgeable in the subject matter covered by the elements contained in the training program as it relates to the workplace that the training will address.
- Training solely by means of a film or video, without the opportunity for a discussion period, would not be acceptable.
- Generic films, videos, or computer programs, even an interactive one, is not considered appropriate unless the employer supplements such training with the site-specific information required.
- Trainees must have direct access to a qualified trainer during their training.