


Could Your Practice Pass an OSHA Inspection?

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Mary Govoni & Associates

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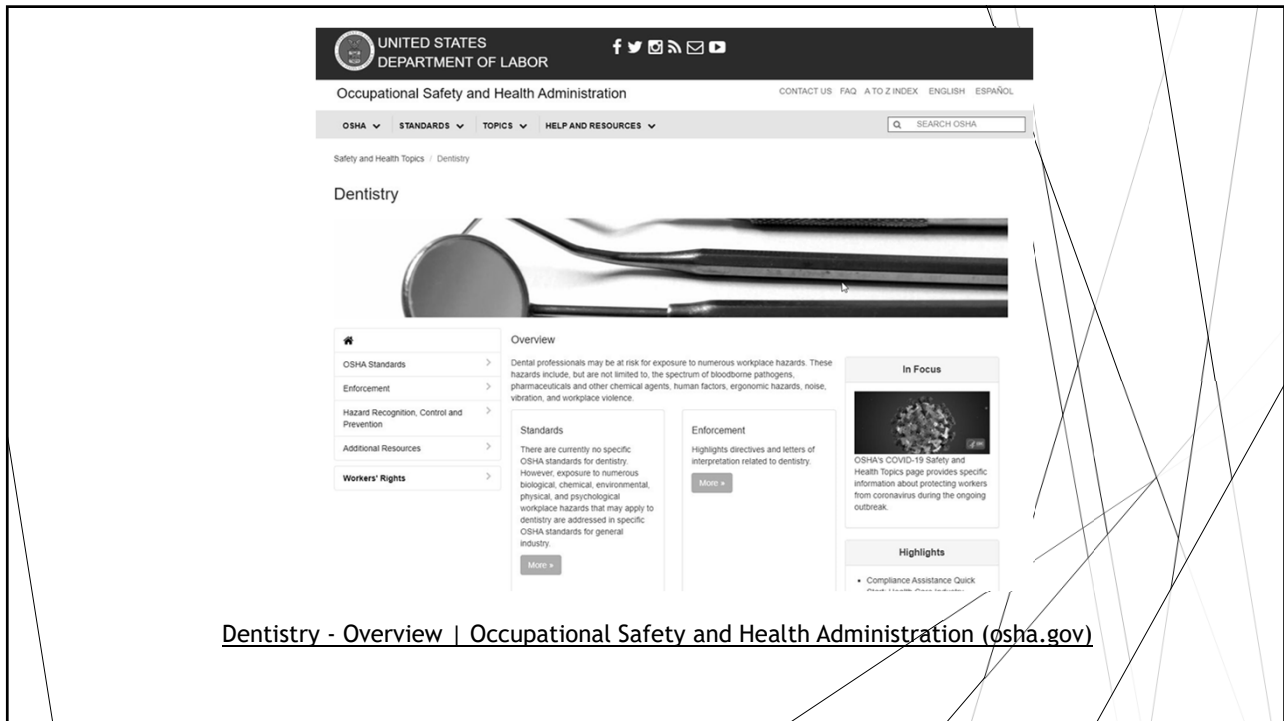
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The Origins of OSHA

- ▶ **Became law in 1970 as the OSH Act**
 - **General Duty Clause**
 - Employers must provide a workplace free from recognized hazards that are causing or likely to cause death or serious physical harm
 - Employers shall comply with occupational safety and health standards promulgated under the Act
 - Employees shall comply with occupational safety and health standards and all rules and regulations under the Act

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UNITED STATES DEPARTMENT OF LABOR
Occupational Safety and Health Administration

OSHA STANDARDS TOPICS HELP AND RESOURCES

Safety and Health Topics / Dentistry

Dentistry

Overview
Dental professionals may be at risk for exposure to numerous workplace hazards. These hazards include, but are not limited to, the spectrum of bloodborne pathogens, pharmaceuticals and other chemical agents, human factors, ergonomic hazards, noise, vibration, and workplace violence.

Standards
There are currently no specific OSHA standards for dentistry. However, exposure to numerous biological, chemical, environmental, physical, and psychological workplace hazards that may apply to dentistry are addressed in specific OSHA standards for general industry.

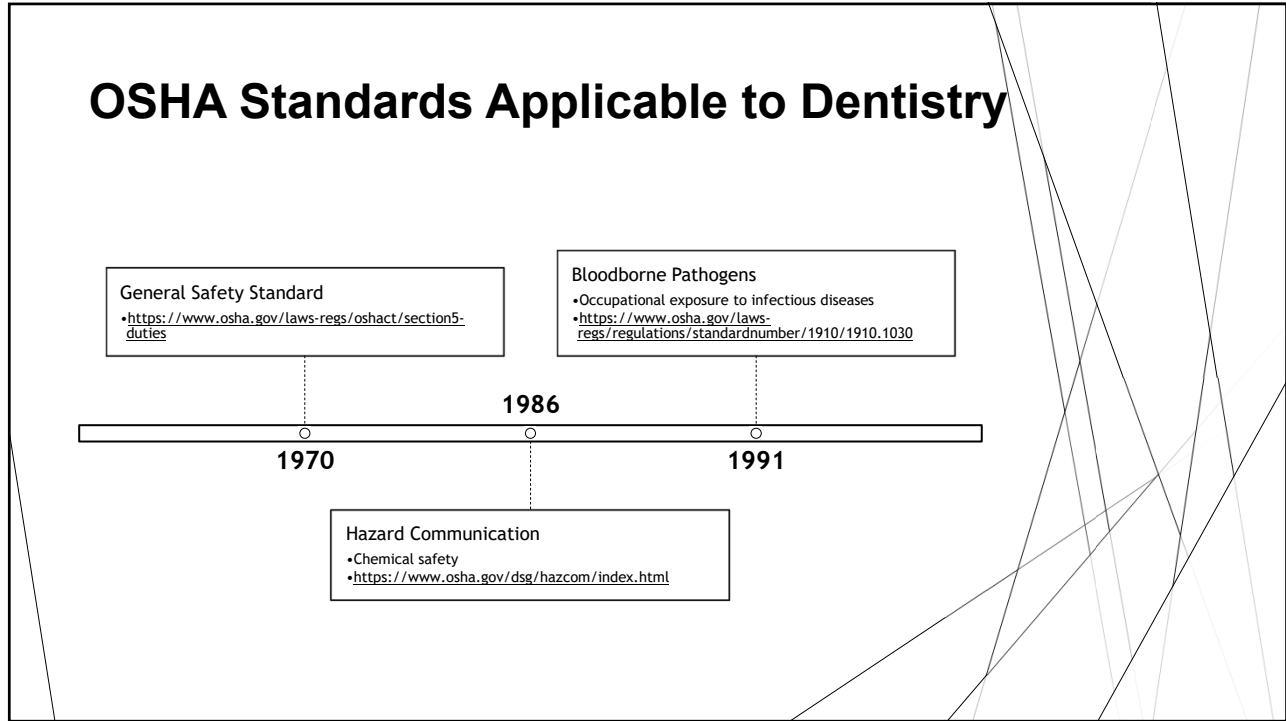
Enforcement
Highlights directives and letters of interpretation related to dentistry.

In Focus
OSHA's COVID-19 Safety and Health Topics page provides specific information about protecting workers from coronavirus during the ongoing outbreak.

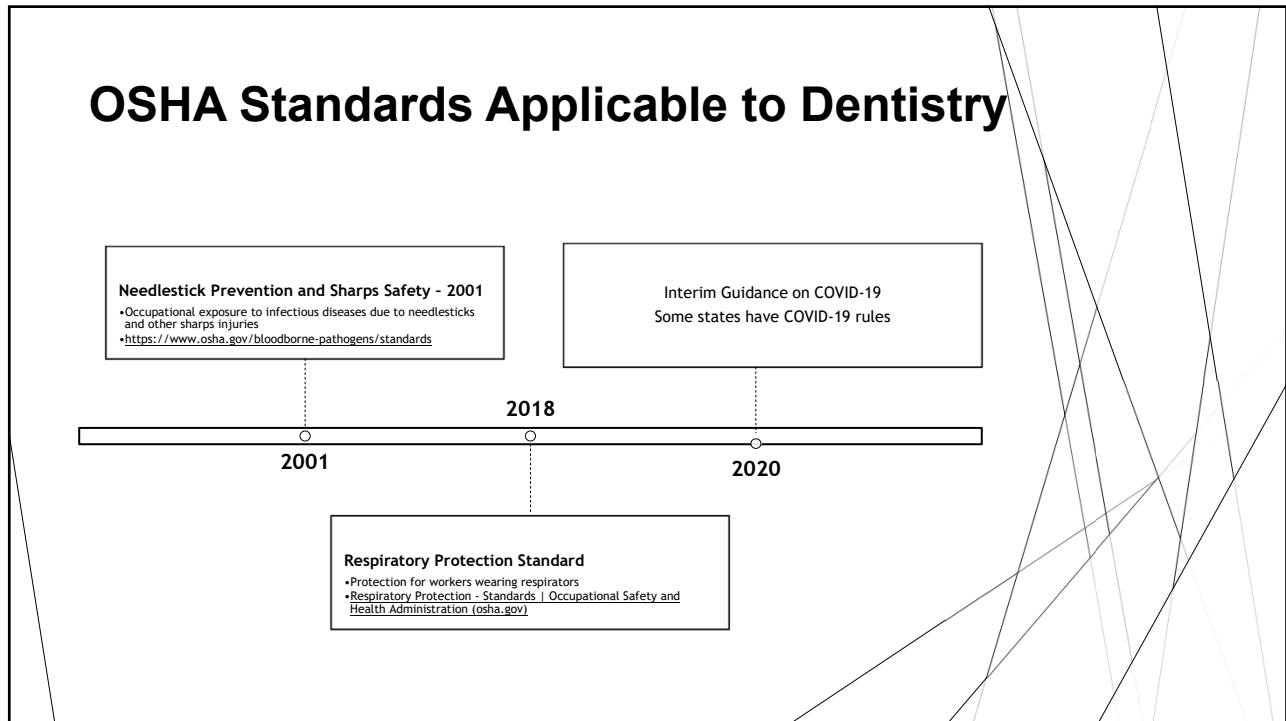
Highlights
Compliance Assistance Quick

Dentistry - Overview | Occupational Safety and Health Administration (osha.gov)

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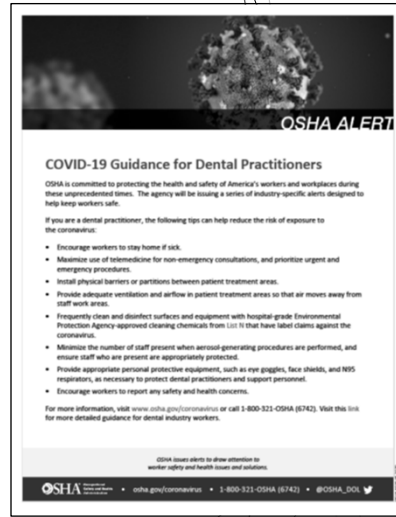


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OSHA's Guidance on COVID-19



Specific to Dentistry

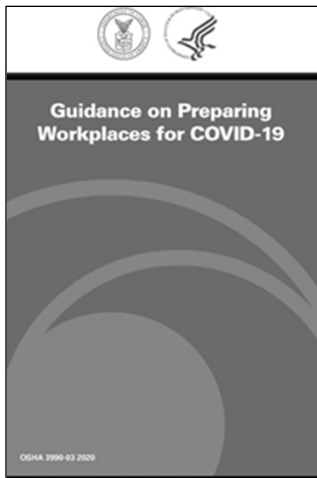


[COVID-19 Guidance for Dental Practitioners \(osha.gov\)](https://www.osha.gov/coronavirus)

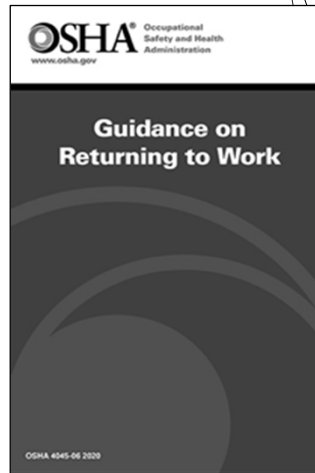
[COVID-19 - Control and Prevention | Dentistry Workers and Employers | Occupational Safety and Health Administration \(osha.gov\)](https://www.osha.gov/coronavirus)

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OSHA's Guidance on COVID-19



Not specific to Dentistry




<https://www.osha.gov/Publications/OSHA3990.pdf>

<https://www.osha.gov/Publications/OSHA4045.pdf>

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How is a practice chosen for an OSHA Inspection?

- Complaints
- Referrals - from other regulatory agencies
- National, state, local Emphasis Programs
 - Unannounced inspections
 - Current LEP/SEP - TN and MI




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OSHA Enforcement of COVID-19 Protections

Enforcement of COVID-19 rules and respiratory protection standard

▶ [US Department of Labor issues stronger workplace guidance on coronavirus | Occupational Safety and Health Administration \(osha.gov\)](#)




QuickTakes

Feb. 1, 2021 • Volume 20, Issue 3 • A twice monthly newsletter with information about workplace safety and health.

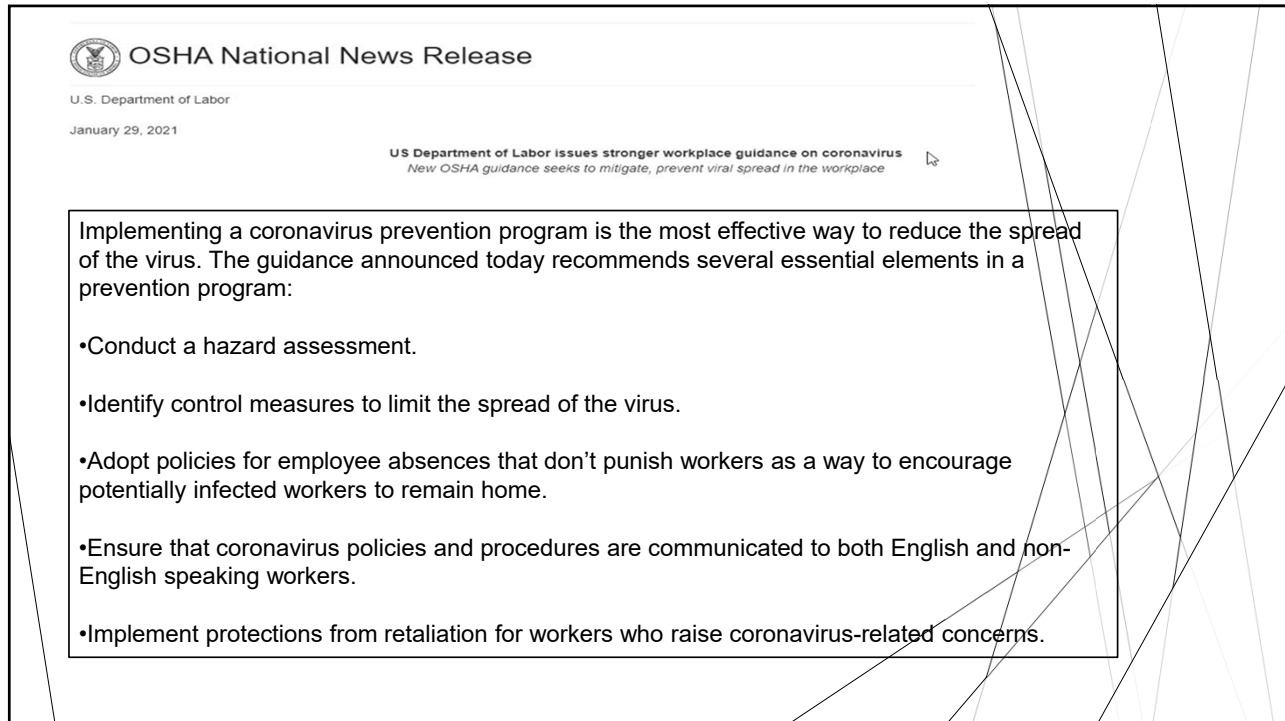
50SHA
Protecting the American Worker

Coronavirus Response

OSHA issues stronger worker safety guidance to help employers and workers identify risks of COVID-19 exposure and contraction, and implement a COVID-19 Prevention Program.



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OSHA National News Release
U.S. Department of Labor
January 29, 2021

US Department of Labor issues stronger workplace guidance on coronavirus
New OSHA guidance seeks to mitigate, prevent viral spread in the workplace

Implementing a coronavirus prevention program is the most effective way to reduce the spread of the virus. The guidance announced today recommends several essential elements in a prevention program:

- Conduct a hazard assessment.
- Identify control measures to limit the spread of the virus.
- Adopt policies for employee absences that don't punish workers as a way to encourage potentially infected workers to remain home.
- Ensure that coronavirus policies and procedures are communicated to both English and non-English speaking workers.
- Implement protections from retaliation for workers who raise coronavirus-related concerns.

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Establishment Search Page | Occupational Safety and Health Administration (osha.gov)

Establishment Search
Reflects inspection data through 01/29/2021

This page enables the user to search for OSHA enforcement inspections by the name of the establishment. Information may also be obtained for a specified inspection or inspections within a specified SIC.

Note: Please read important information below regarding interpreting search results before using.

Search By:

Establishment: dental
(This box can also be used to search for a State Activity Number for the following states: NC, SC, KY, IN, OR and WA)

State: All States | Fed & State

OSHA Office: All Offices

Site Zip Code: []

Case Status: All Closed Open

Violation Status: All With Violations Without Violations


Inspection Date

Start Date: March | 3 | 2020


End Date: February | 3 | 2021

Submit Reset

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**UNITED STATES
DEPARTMENT OF LABOR**



Occupational Safety and Health Administration

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OSHA ▾
STANDARDS ▾
TOPICS ▾
HELP AND RESOURCES ▾

Establishment Search Results

Establishment	Date Range	Office	Zipcode	State
dental	03/03/2020 to 02/03/2021	all	all	all

Please note that inspections which are known to be incomplete will have the identifying Activity Nr shown in italic. Information for these open cases is especially dynamic, e.g., violations may be added or deleted.

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Dental Inspections from 3-1-20 through 2/1/21

#	Activity	Opened	RID	St	Type	Sc	SIC	NAICS	Vio
<input type="checkbox"/>	1 1509731.015	01/12/2021	0552652	MI	Complaint	Partial		621210	
<input type="checkbox"/>	2 1509780.015	01/11/2021	0854910	UT	Complaint	Partial		339116	
<input type="checkbox"/>	3 1508731.015	01/06/2021	0552652	MI	Complaint	Partial		621210	
<input type="checkbox"/>	4 1507716.015	12/15/2020	0253410	NJ	Complaint	Partial		611310	
<input type="checkbox"/>	5 1505094.015	12/07/2020	0112000	CT	Complaint	Partial		621210	
<input type="checkbox"/>	6 1505059.015	12/03/2020	0454722	TN	Complaint	Partial		621210	
<input type="checkbox"/>	7 1503949.015	11/25/2020	0253410	NJ	Complaint	Records		611310	
<input type="checkbox"/>	8 1503765.015	11/24/2020	0253410	NJ	Complaint	Records		621210	
<input type="checkbox"/>	9 1504036.015	11/23/2020	0257260	PR	Referral	Partial		423450	
<input type="checkbox"/>	10 1503565.015	11/23/2020	0953220	NV	Referral	Partial		621210	
<input type="checkbox"/>	11 1498958.015	10/30/2020	0552652	MI	Complaint	Partial		621210	
<input type="checkbox"/>	12 1495886.015	10/13/2020	0552652	MI	Complaint	Partial		621210	
<input type="checkbox"/>	13 1497841.015	09/28/2020	0950632	CA	Complaint	Partial		621210	
<input type="checkbox"/>	14 1494412.015	09/25/2020	0355125	VA	Complaint	Partial		621210	
<input type="checkbox"/>	15 1494462.015	09/25/2020	0953220	NV	Referral	Partial		621210	
<input type="checkbox"/>	16 1494464.015	09/24/2020	0454722	TN	Complaint	Complete		621210	
<input type="checkbox"/>	17 1493907.015	09/16/2020	1055340	WA	Complaint	Partial		621210	
<input type="checkbox"/>	18 1488931.015	08/21/2020	0420600	FL	FollowUp	Partial		621210	
<input type="checkbox"/>	19 1488908.015	08/21/2020	0112000	CT	Complaint	Partial		621210	
<input type="checkbox"/>	20 1484731.015	07/22/2020	0625400	TX	Complaint	Partial		621210	
<input type="checkbox"/>	21 1484934.015	07/22/2020	0626600	TX	Complaint	Partial		621210	
<input type="checkbox"/>	22 1483449.015	07/15/2020	0552652	MI	Complaint	Partial		621210	1
<input type="checkbox"/>	23 1483450.015	07/15/2020	0552652	MI	Complaint	Partial		621210	1
<input type="checkbox"/>	24 1481702.015	07/07/2020	0552652	MI	Complaint	Partial		621210	1
<input type="checkbox"/>	25 1480297.015	06/29/2020	0552652	MI	Complaint	Partial		621210	
<input type="checkbox"/>	26 1479626.015	06/18/2020	0112000	CT	Complaint	Partial		621210	1
<input type="checkbox"/>	27 1479181.015	06/16/2020	0134000	MA	Complaint	Partial		621210	7
<input type="checkbox"/>	28 1477925.015	06/11/2020	0552652	MI	Complaint	Partial		621210	1
<input type="checkbox"/>	29 1478280.015	06/10/2020	0521400	IL	Complaint	Partial		621210	
<input type="checkbox"/>	30 1476787.015	05/28/2020	0950411	AZ	Complaint	Partial		621210	2
<input type="checkbox"/>	31 1476244.015	05/26/2020	0950632	CA	Complaint	Partial		621210	
<input type="checkbox"/>	32 1475888.015	05/21/2020	0317700	PA	Complaint	Partial		621210	1
<input type="checkbox"/>	33 1470424.015	03/19/2020	1050210	AK	Complaint	Partial		621210	2
<input type="checkbox"/>	34 1466966.015	03/05/2020	0552652	MI	Complaint	Partial		621210	
<input type="checkbox"/>	35 1467218.015	03/04/2020	0134000	MA	Complaint	Partial		621210	1

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Do employers have rights regarding inspections?

- ▶ It depends...
 - ▶ Was there a complaint?
 - ▶ Are employees in serious danger?
 - ▶ In some cases, inspection can be rescheduled
 - ▶ SEP's and LEP's typically don't allow rescheduling
 - ▶ Exceptions may be made due to COVID-19
 - ▶ An employer does have the right to dispute/defend any citations



[Employer Rights and Responsibilities Following a Federal OSHA Inspection](#)

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What happens during an OSHA inspection?


- ▶ Review of documentation - inspector will have a list of items
 - ▶ Training records, safety plans, posters, receipts for purchase of PPE, and more
- ▶ Interviews with OSHA manager and employees
- ▶ Walk-around of facility
- ▶ Follow-up visit with inspection report
- ▶ Abatement conference

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<p>01</p> <p>Make sure they are wearing a mask or face covering</p> <p>Verify credentials</p>	<p>02</p> <p>Ask him/her to wait outside of the office, per your policy of not having individuals in the reception area</p>	<p>03</p> <p>Notify doctor(s), OSHA Coordinator</p>	<p>04</p> <p>Ask if you can reschedule when there are no patients</p>
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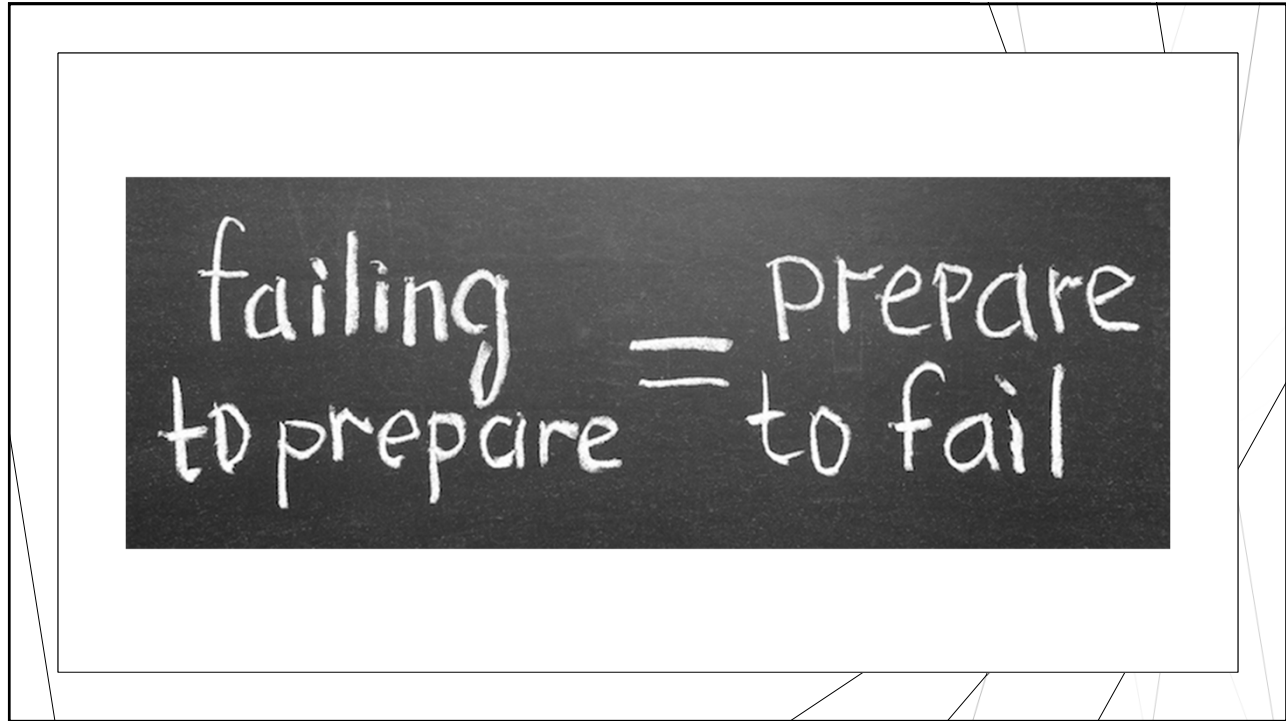
What to do if an inspector comes to the practice?

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Is it possible to pass an inspection?

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Update safety plans annually

OSHA-Required Safety Plans

- ▶ Exposure Control
 - ▶ Bloodborne Pathogens Standard
 - ▶ COVID-19 Preparedness and Response
- ▶ Chemical Safety - Hazard Communication
 - ▶ Hazard Communication Standard
- ▶ Medical/Hazardous Waste Management
 - ▶ State environmental agency
 - ▶ Sharps, pharmaceuticals, amalgam



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OSHA-Required Safety Plans



- ▶ Emergency Response Plan
- ▶ COVID-19 Preparedness and Response
- ▶ Respiratory Protection Plan
 - ▶ Fit testing
 - ▶ Medical evaluations

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OSHA Compliance Checklist – Infection Prevention

Task	Compliant	Needed to Comply	Date Completed
Safety Coordinator Identified			
Copies of OSHA Bloodborne Pathogens Standard on file			
Copies of CDC Guidelines on file – Infection Prevention			
Copies of CDC Interim Guidance for COVID-19 on file			
Employee Training – initial (new employees)			
Employee Training – annual			
Employee Training – COVID-19			
Exposure Determination documented - PPE			
Exposure Determination documented COVID-19			
Exposure Control Plan documented/updated			
COVID-19 Preparedness & Response Plan documented			
Post-exposure plan documented for BBPS			
Post exposure plan documented for COVID-19			
Exposure incidents documented - BBPS			

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OSHA Compliance Checklist – Hazard Communication/Chemical Safety			
Task	Compliant	Needed to Comply	Date Completed
Safety coordinator identified			
Copies of OSHA Hazard Communication Standard on file			
Employee Training – initial (new employees)			
Employee Training – annual			
Hazard Communication Plan documented			
PPE is available, including utility gloves			
Chemical Inventory documented/updated			
Safety Data Sheets on file/updated			
Safety Data Sheets accessible to employees			
Products dispensed into secondary containers labeled			
OSHA required safety posters displayed			
General safety measures observed – no tripping or fire hazards			
Fire extinguishers mounted on the wall			
Fire extinguishers inspected and updated			
Chemical spill kit available			

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OSHA Compliance Checklist – Hazardous Waste			
Task	Compliant	Needed to Comply	Date Completed
Safety coordinator identified			
Copy of State Medical Waste regulations on file			
Employee Training – initial (new employees)			
Employee Training – annual			
Medical/Hazardous Waste Plan documented			
Medical/Hazardous Waste Producer registration completed and updated (if applicable)			
Sharps containers located in treatment rooms and sterilization area			
Sharps containers disposed of through licensed medical waste company			
Contaminated waste (not regulated – e.g. gloves) disposed of in closed containers with biohazard label			
Amalgam waste disposed of through licensed waste company (if applicable)			
Pharmaceutical waste (carpules with anesthetic or other drugs remaining) disposed of through licensed waste company			
Records for pick-up of medical/hazardous waste on file			
Records of destruction of medical/hazardous waste on file			

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Respiratory Protection Compliance Checklist			
Task	Compliant	Needed to Comply	Date Completed
Safety coordinator identified			
Copies of OSHA Respiratory Protection Standards on file			
Employee Training – initial (new employees)			
Employee Training – annual			
Respiratory Protection Plan documented			
Medical evaluations completed for all employees wearing respirators			
Fit testing completed for all employees - initial			
Fit testing completed for all employees when type of respirator is changed			
Fit testing completed for all employees - annual			
Records of attempts to obtain N95 respirators during pandemic/supply shortage documented			
Respirators reused only when FDA Emergency Use Authorizations in effect			
Respirators decontaminated for reuse following CDC/FDA guidelines			

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**What we've learned from
 the COVID-19 era
 inspections**

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States with COVID-19 OSHA Rules

- ▶ California
 - ▶ [Cal/OSHA COVID-19 Resources](#)
- ▶ Michigan
 - ▶ [MIOSHA COVID-19 Emergency Rules 10-14-20 \(michigan.gov\)](#)
- ▶ Oregon
 - ▶ [Oregon Occupational Safety and Health : COVID-19 and Oregon OSHA : COVID-19 : State of Oregon](#)
- ▶ Virginia
 - ▶ [Coronavirus-Hazard-Alert.pdf \(virginia.gov\)](#)


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OSHA's Expectations

- ▶ COVID-19 coordinator
- ▶ COVID-19 Preparedness and Response Plan (written)
- ▶ Training on SARS-CoV-2 and COVID-19
- ▶ Screening of patients and employees



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OSHA's Expectations

- ▶ Reducing risk of exposure
 - ▶ Work practice and engineering controls
 - ▶ PPE - respirators
 - ▶ Aerosol containment
 - ▶ Air purification

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OSHA and N95 Respirators


- ▶ Required when performing Aerosol Generating Procedures - AGP's
- ▶ Must be fit tested prior to wearing
- ▶ Employees must have medical evaluation for wearing respirators
 - ▶ Documentation for medical evals and fit testing

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OSHA and N95 Respirators

- ▶ KN95's allowable under FDA EUA
 - ▶ Most don't pass fit testing
- ▶ ASTM Level 3 is appropriate for non-AGP only
- ▶ Full face shields required with respirators and masks

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SARS-CoV-2 and COVID-19 Training

- ▶ Training must be updated if new information becomes available
- ▶ Must cover:
 - ▶ Workplace infection control practices
 - ▶ Proper use of PPE
 - ▶ Steps employees must follow if COVID-19 symptoms are suspected or COVID-19 is confirmed
 - ▶ How to report unsafe working conditions

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COVID-19 Coordinator

- ▶ Could be the same person as OSHA Coordinator
- ▶ Maintains records of potential exposures, employee screenings, coordinated response to potential exposures

Safety matters

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OSHA Expectations

- ▶ Preparedness and Response Plan
 - ▶ How to protect workers from COVID-19
 - ▶ How to respond in the case of an exposure of a worker to COVID-19

COVID-19 Preparedness and Response Plan

This policy represents the COVID-19 Preparedness and Response plan for this practice. All employees have received training updates in infection prevention related to SARS-CoV-2 (COVID-19), PPE requirements, patient screening requirements, sterilization and disinfection protocols, and necessary actions to take if a patient or employee develops symptoms or tests positive for COVID-19.

Definitions:

Close Contact: someone who was within 6ft of an infected person for at least 15 minutes cumulative over a 24 hour period, starting from 2 days before illness onset (or for asymptomatic persons, 2 days prior to specimen collection) until the time the person is isolated

COVID-19: coronavirus disease 2019, a severe acute respiratory disease characterized by symptoms including fever, cough, fatigue, and shortness of breath which may progress to pneumonia, multi-organ failure, & death

Known Cases of COVID-19: persons who have been confirmed through diagnostic testing to have COVID-19

SARS-CoV-2: severe acute respiratory syndrome coronavirus 2, the virus which is the causative agent of COVID-19


Suspected Cases of COVID-19: persons who have symptoms of COVID-19 but have not been confirmed through diagnostic testing or person who have had close contact with a person who has been confirmed through diagnostic testing.

Exposure Determination for Risk of Exposure to SARS-CoV-2 (COVID-19)
The exposure determination for COVID-19 is attached to this document.

Hazard Assessment for Risk of Exposure to SARS-CoV-2 (COVID-19)
The Hazard Assessment for COVID-19 is attached to this document. This practice will conduct a Hazard Assessment on a weekly basis since the incidence of COVID-19 cases may change.

Screening of Patients for Symptoms of COVID-19:

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OSHA's Expectations

- ▶ Hazard Assessment
- ▶ Exposure Determination

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OSHA Expectations

- ▶ Hazard Assessment
 - ▶ What hazards are workers exposed to?
 - ▶ How are those hazards mitigated?
- ▶ Should also have hazard assessment for BBPS and HazCom

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Hazard Assessment for COVID-19
To Be Completed Weekly

Date of this assessment:

This risk assessment is intended to calculate the potential hazard for transmission of the SARS-CoV2 virus that causes COVID-19 in this dental practice, during the current pandemic. This assessment is prepared in compliance with the OSHA Guidance for COVID-19. This document is to be used in conjunction with the OSHA required Hazard Assessment for PPE, which is part of the documentation in this practice for compliance with the Bloodborne Pathogens Standard and the Hazard Communication Standard.

Incidence of COVID-19 Cases:
Community Incidence of COVID-19 is Increasing Steady Decreasing

PPE Supply and Availability:
Supplies of surgical masks are: Adequate Low Inadequate
Supplies of N95 respirators are: Adequate Low Inadequate
Supplies of KN95 (if used) are: Adequate Low Inadequate
Supplies of exam gloves are: Adequate Low Inadequate

Screening of patients and DHCP:
Patient screening Temperature (each appt.) Symptoms (each appt.)
Employee screening Temperature (daily) Symptoms (daily)

Universal Source Control:
Patients must wear mask when entering and leaving the office: Yes No
Employees must wear mask when not in treatment areas: Yes No

Engineering Controls:
The office/facility has been evaluated by an HVAC technician Yes No

Air purification units (HEPA) filtration is present in: treatment rooms employee lounge
reception area other:

Assessment completed by (initials): Date:

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OSHA Expectations

- ▶ **Exposure Determination**
 - ▶ Which employees are exposed to the hazards identified?
 - ▶ Should also have exposure determination for BBPS.

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Exposure Determination for COVID-19				Date Completed
Level of Exposure Risk	Types of Procedures	Work Area	PPE Required	
Lower	Administrative tasks – checking patients in and out, patient screening upon entering the facility, scheduling appointments	Business office	Face covering	
Medium	Non-aerosol-generating procedures – consultations, emergency, initial or periodic examinations, radiographs, instrument reprocessing, laboratory procedures	Operator/treatment Room, Sterilization/instrument reprocessing area, lab area	ASTM Level 3 face mask, full face shield, exam gloves, protective gown/lab coat	
High	Aerosol-generating procedures on well patients or patients with no symptoms or potential exposure to COVID-19 – use of handpieces (high and slow speed), air/water syringe, mechanical scalars (ultrasonic, piezo-electric or sonic), air polishers or air abrasion technology	Operator/treatment room	N95 respirator or higher level of protection (KN95 is allowed by FDA EUA during the COVID-19 pandemic)*; full face shield, exam gloves, protective gown/lab coat *If N95 and KN95 respirators are not available, a Level 3 face mask is allowable, but does not provide optimal respiratory protection	
Very High	Aerosol-generating procedures (emergencies only) on patients suspected of having COVID-19 or patients with symptoms of potential exposure to COVID-19 – use of handpieces (high and slow speed), air/water syringe, mechanical scalars (ultrasonic, piezo-electric or sonic), air polishers or air abrasion technology	Operator/treatment room	N95 respirator or higher level of protection (KN95 is allowed by FDA EUA during the COVID-19 pandemic)*; full face shield, exam gloves, protective gown/lab coat *If N95 and KN95 respirators are not available, treatment should be referred to a facility where the appropriate respiratory protection is available	

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OSHA Expectations

- ▶ **Additional items:**
 - ▶ Documentation of attempts to order/purchase respirators and other PPE
 - ▶ Written Respiratory Protection Plan (if wearing respirators)
 - ▶ Medical evaluations and fit testing of employees who wear respirators (N95 and KN95)

Attempts to Order/Purchase Respirators

Respirator Type	Distributor/Supplier Contacted	Date Contacted	Result (available or not available)

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OSHA Expectations

► Additional items:

- Logs for employee screening
 - Temps under 100° F
 - No symptoms of COVID-19
- Documentation of any potential exposures to COVID-19
 - Report of occupational illness to local health dept.
- Documentation of any quarantine/self isolation of employees



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Where's the PPE???

Exposure to COVID-19 at work


- If all appropriate PPE was being worn, during patient treatment, CDC considers it minimal risk of exposure
 - No testing, quarantine, isolation (unless ordered by local health department)
 - Monitor for symptoms

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Exposure to COVID-19 at work

- ▶ If face covering being worn at all times in the office except when eating
- ▶ And social distancing worn when in break room or meetings
 - ▶ Lower risk

Increases Risk



Source: Microsoft Creative Commons



This Photo Source: Microsoft Creative Commons

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Exposure to COVID-19 in the community (as defined by the CDC)

- ▶ If face covering/mask worn and social distancing observed
 - ▶ Lower risk
- ▶ If exposure occurred from member of household
 - ▶ higher risk
- ▶ Contact local health dept. for guidance
 - ▶ Self-isolation and/or testing

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- ▶ When an employer learns of an employee, visitor or customer (patient) with a known case of COVID-19, the employer must:
 - ▶ Immediately notify the public health department (county)
 - ▶ Notify any co-workers, contractors or suppliers that may have been in contact with the person with a known case of COVID 19
 - ▶ Notify OSHA if an employee is hospitalized for COVID-19 or dies from COVID-19

OSHA requirements for COVID-19 that is work related

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If a member of the team contracts COVID-19

- ▶ Follow guidance from public health officials (CDC)
 - ▶ Testing and quarantine
 - ▶ Update guidance on testing and quarantine options from CDC 12-2-20
 - ▶ [Options to Reduce Quarantine for Contacts of Persons with SARS-CoV-2 Infection Using Symptom Monitoring and Diagnostic Testing | CDC](#)

Options to Reduce Quarantine for Contacts of Persons with SARS-CoV-2 Infection Using Symptom Monitoring and Diagnostic Testing

Updated Dec. 2, 2020 Languages ▾ Print

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Recommended Actions to Be Prepared for Possible Inspection

- ▶ OSHA manual and documentation
 - ▶ Review compliance checklists
 - ▶ Verify that training records are in order
 - ▶ Update safety plans
 - ▶ Update chemical inventory and SDS's

- ▶ ORGANIZE!!!

- ▶ Go electronic
 - ▶ Easier to update
 - ▶ Backup data



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