

**SPOKANE ORAL SURGERY**

OSHA / WISHA 2019

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# OSHA vs WISHA

**OSHA**--Occupational Safety & Health Act by Congress 1970

**WISHA**--Washington Industrial Safety & Health Act 1973

- \* **L&I** Department of Labor & Industries - - empowered by WISHA to create & enforce safety & health regulations
- \* **DOSH** Division of Occupational Safety & Health - -Part of L&I, they enforce the safety & health rules by inspecting worksites
- \* **WAC** The rules of WISHA are called Washington Administrative Codes
- \* **CSHO** Compliance Safety & Health officers will conduct L&I inspections



OSHA / WISHA why?

# INSPECTIONS

- No advance notice required
- Fines can be imposed

Generated by:

- Complaints employees or ex-employees (most common)
  - Accidents
  - Random selection
- 
- Can you be sentenced to jail term for giving advanced notice of inspection to an employer?



**Safety  
is a job  
requirement**

## WISHA WAS CREATED TO:

- \*Encourage employers & employees to reduce workplace hazards
- \*Implement & improve existing safety & health standards
- \*Establish responsibilities & rights for employers & employees
- \*Maintain reporting & recordkeeping system to monitor job related injuries & illnesses
- \*Establish training programs to increase competence
- \*Develop mandatory job safety & health standards and enforce them effectively

# Employee Rights under WISHA

- \* Safe & healthy workplace
- \* Know about hazardous chemicals
- \* Info about injuries / illnesses in your workplace
- \* Complain or request hazard correction from employer
- \* Training
- \* Hazard exposure and medical records
- \* File complaint with WISHA
- \* Participate in WISHA inspection
- \* Be free from retaliation for exercising safety & health rights
  - PPE provided at no cost

WAC296-32-115 Safe Place Standard



# Employer responsibilities under WISHA

- \* Provide safe & healthy workplace free of recognized hazards
- \* Provide training required by WISHA, use safeguards & safety devices and work practices for a safe workplace
- \* Injury and illness record keeping
- \* Establish, supervise & enforce rules that lead to safe & healthy work environment
- \* Cannot discriminate against workers exercising their rights
- \* Post updated, required WISHA posters to be easily seen by employees
  - Provide and pay for PPE
- \* Offer Heb B vaccination

WAC 296-800-200 WISHA poster

# Common Citations

- 1) Lack of Written Exposure Control Program
- 2) Out-of-date or lack of Written Programs-must be reviewed and updated at least annually
- 3) Inadequate staff training-training regarding bloodborne pathogens annually
- 4) Lack of training documentation-must maintain training records for at least 3 years
- 5) Failure to document the Hepatitis B series
- 6) Failure to use Personal Protective Equipment (PPE)
- 7) Incomplete Safety Data Sheets
- 8) Overfilled sharps containers
- 9) Failure to conduct safety meetings
- 10) Inadequate or lack of eyewash station



Required records must include any work-related injury / illness resulting in the following:

- ▶ Death
- ▶ Medical treatment beyond 1<sup>st</sup> aid
- ▶ Loss of consciousness
- ▶ Diagnosis of significant injury/illness by licensed health care professional
- ▶ Days away from work/restricted work or transfer

RECORDKEEPING  
WAC 296-27

# Required forms

- ▶ Form 300 Log of work related injuries & illnesses
- ▶ Form 300A Summary of work related injuries & illnesses (Partially exempt) posted Feb thru April
- ▶ Form 301 Injury & illness incident report

RECORD KEEPING  
WAC 296-27

# WISHA REPORTING REQUIREMENTS

Emergency -- L&I office must be called if:

- 1) Workplace death (within 30 days of the accident)
- 2) Workplace injury that may be fatal
- 3) Overnight hospitalization (within 30 days of the accident)

800-423-7233

Complaints

OSHA/WISHA Advise

Products

800-321-6742



Information regarding  
filing a WISHA complaint  
inspections  
reporting  
violations, fines & penalties

[www.oshamanual.com](http://www.oshamanual.com)

[www.osha.gov](http://www.osha.gov)

[www.lni.wa.gov](http://www.lni.wa.gov)

[www.oshaonline.com](http://www.oshaonline.com)

# OFFICE REQUIREMENTS



Accident prevention program  
Bloodborne pathogens  
Infection control  
Radiation safety  
Emergency action plan  
Fire prevention plan  
Hazardous chemical program  
Exposure control program  
Infectious waste management  
Workplace violence policy

# Accident prevention program

- \* Safety orientation
- \* First aid training
- \* Use & care of required PPE
- \* Emergency procedures
- \* Evacuation drills and routes and meeting site location
- \* Safety meetings
- \* Accident and injury reporting
- \* Identification of hazardous gases, chemicals and materials
- \* Emergency procedures following exposure to hazardous materials
- \* WISHA posters & bulletin boards
- \* Equivalent forms may be used
- \* May use electronic version—must have access by all employees



# Safety Orientation

Description of your total safety & health program  
On-the-job safety orientation prior to job assignment  
How to report injury and unsafe practices  
Use and care of PPE  
Identification of hazards  
Emergency training



# First Aid

Employers must:

Train all staff involved with direct patient care in CPR/BLS training

First aid kit should adequate supplies and checked monthly

Have a first Aid coordinator

Carry adequate supplies

WAC 296-800-150

# PPE

Use and care of PPE

Training:

- prior to initial job assignment

- change in work assignments

- poor work habits requiring re-training

Documentation of training- employee name, dates, trainer

Supplied by the employer at no cost to the employee

Documented hazard assessments for PPE

WAC 296-800-160 Hazard assessment checklist



# Safety Meetings

Not required for 10 or less employees

Meet monthly:

Document meeting minutes, attendance, issues, resolutions

Adequate representation from all areas of the office staff

Management

Surgical staff

Admin

## Safety Bulletin Boards

Must maintain a safety bulletin board at every workplace

Include safety bulletins, newsletters & posters, emergency numbers

WISHA posters

WAC 296-800-190 Safety bulletin board

WAC 296-800-200 WISHA poster



EMERGENCY ACTION PLAN



# Emergency Action Plan

Evac drills & exit routes, including floor plans / maps

Exit signs

- Clearly marked / visible / properly functioning

- Check monthly

Proper signage on doors

Meeting place protocols accounting for all employees

Alarm system properly functioning & properly maintained

Training

- new hire

- plan changes

- annually

Written emergency action plan & fire prevention plan  
(required for facilities with 11+)

WAC 296-800





# Emergency Action Plan

Exit Routes WAC 296-800-310

- Unobstructed

- Clearly marked

- Exit lighting - properly working all times

Emergency Action Plan WAC 296-24-567

- Floor plans / map indicating escape routes & actions to ensure safety

- Procedures to account for all employees after an emergency

- Written plans are mandatory for 10+ employees

Fire extinguishers

- Maintain fully charged & operational
- annual maintenance check

- Keep record for 1 year after the last entry or the life of the shell,  
(whichever is less)

- Training @ initial hire & annually

# FIRE PREVENTION PLAN

## Fire extinguishers

- Adequate number provided

- Checked monthly - fully charged & maintained

- Train all employees - upon hire & annually

- P.A.S.S.

- Annual maintenance check by qualified person

- Keep all maintenance records for 1 yr after the last check

- Or the life of the shell

WAC 296-800-300 Employee Emergency Plans & Fire Prevention

# Workplace Violence Prevention program

## Management commitment

- Making and enforcing rules of conduct for

- Clear policy of zero tolerance

- Ensure no reprisals for employees reporting incidents

## Employee involvement

- Prompt & accurate reporting

- Understand & comply

- Take part in CE programs

## Worksite analysis

- Find existing or potential hazards

- Assess vulnerability to violence

## Engineering controls

- Alarm system

- Security cameras

- Door locks waiting area

# Workplace Violence Prevention program

- Hazard prevention & control

  - Office standards / codes

  - Evaluation program

- Training & Education (within 90 days of new hire)

  - Review workplace violence prevention policy

  - Know risk factors

  - Warning signs

  - Ways to prevent volatile situations

  - Standard action plan

- Recordkeeping & evaluation

  - Log of injury / Illnesses (OSHA 300 form)

  - Medical reports of work injury assaults

  - Incidents of abuse, verbal attacks, aggressive behavior

  - Safety meeting minutes, hazard analyses, corrective actions

  - All training programs

Records must be maintained for 5 years



# EXPOSURE CONTROL PROGRAM



## Infection Control is vital in Dentistry:

- exposure to pathogens
- direct contact with blood
- oral/respiratory secretions
- contaminated equipment
- Contact with droplets or spatter
- Inhalation of airborne microorganisms



## Infection control strategies:

- Immunizations of healthcare worker
- Hand hygiene
- Barriers
- Cleaning & Disinfecting, Sterilization
- Medical waste disposal
- Practices to reduce the risks
- Standard precautions

WAC 296-823-11005



# Elements of universal precautions

Hand washing

Use of PPE

Develop a written schedule for cleaning / decontamination  
(Inspector will look for this!)

Item / surface, location, cleaner, frequency, PPE, Employee

Sterilization patient care equipment / instruments

Environmental surfaces - decontaminate or surface barriers

Injury prevention

Safe use & disposal of sharps

WAC 296-823-14055

Several thin, parallel white lines of varying lengths and orientations are positioned in the bottom right corner of the slide, creating a modern, abstract graphic element.

# Radiation Safety

Individuals working in environment with x-ray machines can be subject to occupational radiation exposure

Factors:

- amount of radiation
- duration of exposure
- distance to source
- type of shielding

Administrative controls:

- Warning signs

- Safety procedures

- Safety training

- PPE

- personal dosimeter/ film badges



WAC 296-62-09004

# Hazardous Communication Standard

## Purpose:

Ensure hazards of chemicals are communicated to employers & employees  
To protect workers against chemical illnesses & injuries

## Employer requirements:

Written hazard communication program

Labels on all containers

SDS sheets (required 16 section format & readily accessible)

Training to protect employees in event of leak or spill

Use of GHS (globally harmonized system)

WAC 296-901-14000



- ▶ SDS sheets inform employees about the hazardous chemicals in which they are exposed
- ▶ Maintain copies SDS sheets received with shipments
- ▶ Compile electronic or paper copy
- ▶ Provide employees with information & training- Must be documented but a written program is not required (2013)

# SAFETY DATA SHEETS

# COMMUNICATION OF HAZARDS

- \* Communicate the hazard
- \* Warning labels on:
  - secondary containers
  - regulated waste
  - refrigerator
- \* Sharps containers
- \* Handling contaminated laundry properly
- \* Post signs for restricted areas
- \* Xray area



WAC 296-823-14050    296-823-14065

# Emergency procedures following exposure

## Eye wash station

- Flushes the eyes while the eyes are open
- Hands free once it is on
- Located to reach quickly
- Inspect & activate monthly
- Yearly inspection by professional



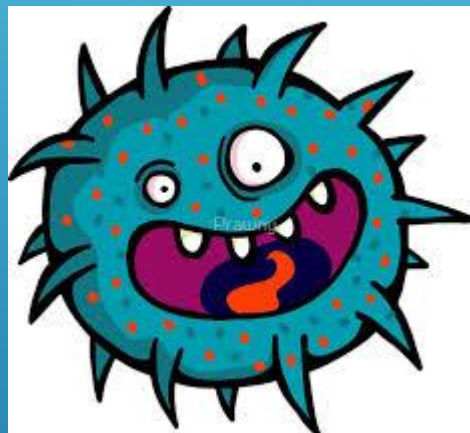
WAC 296-800-150

## Spill kit

- Readily available
- All appropriate PPE
- Training







# BLOODBORNE PATHOGEN STANDARD WAC 296-823

# BLOODBORNE PATHOGENS

What?

- Infectious materials in the blood that cause disease in humans
- Hepatitis B, C and HIV

WISHA regulations?

- Details Employers responsibilities to protect employees
- [www.osha.gov/SLTC/bloodbornepathogens](http://www.osha.gov/SLTC/bloodbornepathogens) [www.osha.gov/needlestick](http://www.osha.gov/needlestick)

Details

- \* Written exposure control plan
- \* Engineering controls
- \* Enforcement
- \* PPE
- \* Vaccination
- \* Exposure protocol
- \* Labels
- \* Training
- \* Record keeping
- \* Regulated waste

# BLOODBORNE PATHOGENS

Transmissible in health care setting

Can produce chronic infection

Often carried by persons unaware of their infection

## Hep B

- 257 million people infected
- Virus can survive 7 days in dried blood

## Hep C

- Survives outside body up to 3 weeks
- Symptoms may occur 1-9 months after exposure
- 71 million people infected chronic Hep C

## HIV

- Appx 5,000 new cases daily
- More fragile virus, may survive 5-6 days in dried blood
- Depletes the immune system

# BLOODBORNE PATHOGENS

## Exposure control plan

- \* Written
- \* Updated annually
- \* Product changes that help eliminate / reduce exposure
- \* Annually document consideration / implementation safer medical devices
- \* Input from assistants identifying, evaluation and selecting medical devices

## Engineering controls

- \* Devices isolate or remove bloodborne pathogen
- \* Sharps containers
- \* Self-sheathing needles
- \* Needleless systems
- \* Sharps with engineered sharps-injury protection

# BLOODBORNE PATHOGENS

## Enforce work practice controls

- \* Hand washing
- \* Sharps disposal
- \* Lab specimen packaging
- \* Laundry handling
- \* Contaminated material cleaning

## PPE

- \* Gloves, gowns, masks, etc
- \* Provide at no cost to employees
- \* Training - annually and when new tasks assigned

# BLOODBORNE PATHOGENS

## Vaccinations

- \* Hep B vaccination made available within 10 days of work assignment
- \* Denial form signed by employee
- \* Employee requested—must make vaccine available



# BLOODBORNE PATHOGENS

## Exposure protocol

- \* Immediate post exposure evaluation with all required exposure incident paperwork
  - Healthcare facility agreement
  - BBP standard copy
  - Exposure incident report - documenting route of exposure & circumstances, and identification of source person
- \* Source individual
  - Consent for blood test
  - If consent is not obtained—employer needs to establish that legally required consent cannot be obtained
  - If source individual already knows they are infected with HBV, HCV or HIV - testing does not need to be repeated
- \* Results made available to the employee only including applicable laws & regulations
- \* Post-exposure prophylaxis if necessary
- \* Counseling provided

# BLOODBORNE PATHOGENS

## Training

- \* Must be provided at initial assignment and assignment changes
- \* Annually
- \* Specialized training when necessary
- \* Documented

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“Lunch break.”

*Thank You!*

*Thank You!*