



Inspection ">>>> Directions

To ensure compliance with OSHA regulations, annual training is a must. Here's what to cover—and how to tackle it.

by Leslie Canham, CDA, RDA

Leslie Canham, CDA, RDA, is an international speaker and consultant specializing in infection control, OSHA compliance, HIPAA regulations and treating special-needs patients. Nearly 45 years of experience in the dental field and her proficiency in OSHA give Canham a unique perspective on how dental practices can be safe, compliant and productive. She is a Certified Speaking Professional, and is authorized as an OSHA trainer and an AGD PACE provider. In addition to her speaking schedule, Canham provides in-office training, consulting, mock OSHA inspections, dental-office audits and webinars.



If an OSHA inspector appeared in your office today and wanted to conduct an inspection, would you pass or fail? And what's at stake, in terms of paperwork and fines? In June, a dentist in Illinois was hit with a \$53,000 fine because of multiple OSHA violations—is that extreme, or the norm? The right preparation may help ensure that you don't find out the hard way.

The Occupational Safety and Health Administration was created to ensure safe and healthful working conditions by setting and enforcing workplace standards. Its work includes offering training, outreach, education and assistance. The two largest standards related to dentistry are:

The Bloodborne Pathogens standard. Dentists are required to protect employees who are at risk for exposure to blood and bodily fluid. Protection must be provided at no charge, and includes hepatitis B vaccination;

training and information on bloodborne pathogens; and personal protective attire. The employer also must have written safety plans, including an exposure control plan.

The Hazard Communication standard. Also known as the "Employee's Right to Understand" law, this requires dentists to ensure chemical safety in the workplace. Employers must provide training and personal protective attire so employees can protect themselves from exposure to chemicals. A new standard became effective in 2013; employers must now provide employees with updated information about the new labels elements and Safety Data Sheets (formerly known as Material Safety Data Sheets).

Training

Both the Bloodborne Pathogen and Hazard Communication standards require dentists to provide training. One of the reasons

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the dentist in Illinois was levied such a large fine is because he didn't provide this training for his employees. Bloodborne Pathogen training is required every year and must be provided by the employer at no charge during regular working hours. Documentation of the training must be maintained by the employer for at least three years.

Anyone can conduct the training, which ensures that the dentist and team are current on compliance with OSHA regulations. If you don't know where to start, these steps can point you in the right direction.

- You'll need an OSHA manual. If you don't have one, your state dental association may offer one; alternatively, you can purchase one from the American Dental Association. Some companies also provide OSHA manuals—just be sure that the manual is designed for dental practices. (If you have time—lots of time—you can create your own OSHA manual with written safety plans by using the tools on the OSHA website: Go to osha.gov and under the "Training & Education" pull-down menu, select "eTools." Then click "Hospital," "Healthcare Wide Hazards" and "Bloodborne Pathogens.")
- Once you purchase the manual, read it. You must personalize the manual by filling in information that describes policies and procedures in your practice. The manual will ask you to fill in the names and classifications of employees; whom to contact in the event of an exposure incident; and the location and instructions for proper use of personal protective equipment. When you finish personalizing your OSHA manual, you can present the information to your dental team.

One method of team training involves having every staffer read the OSHA manual, then holding a meeting to summarize each section. Specific safety plans in the manual

cover aspects of the dental office—review them and provide information about the location of the emergency eyewash station, the first-aid kit and the fire extinguisher. Give instructions on how to handle biohazard waste and contaminated sharps that have been generated in your office. Discuss your exposure-control plan and review the actions that must be taken in the event of an exposure incident. Be sure to allow time for questions and/or comments.

To help you meet the Bloodborne Pathogen training requirements, use the outline below, which recaps the 14 elements that OSHA requires:

- A written copy and explanation of the Bloodborne Standard. The standard is usually in your OSHA manual; if not, get a copy from your state or federal OSHA website.
- 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 exposure-control plan, and how employees can obtain copies of the written plan.
- An explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials (OPIM).
- An explanation of the use and limitations of methods that will prevent or reduce exposures, including appropriate engineering controls, administrative or work practice controls and personal protective equipment.
- Information on the types, proper use, location, removal, handling, decontamination and disposal of personal protective equipment.
- An explanation of the basis for selection of personal protective equipment.
- Information on the hepatitis B

vaccine, including information about its efficacy, safety and method 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 people 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, the medical follow-up that will be made available and the procedure for recording the incident on the Sharps Injury Log if sharps are involved.
- Information about the postexposure evaluation and follow-up that the employer is required to provide for the employee after an exposure incident.
- An explanation of the signs and labels and/or color coding to communicate hazards to employees.
- An opportunity for interactive questions and answers with the person conducting the training session.

In addition to Bloodborne Pathogen training, Hazard Communication training must be conducted. Employers at workplaces

with hazardous chemicals must label their products, provide safety data sheets to workers and train them to handle the chemicals appropriately.

If your OSHA manual was published in 2013 or later, it likely will have a section on the new Globally Harmonized Hazard Communication Standard. Or head to osha.gov/dsg/hazcom for information on how to set up your Hazard Communication plan.

Everyday, everyday dental practice is at risk of being investigated—and possibly shut down—if it's not following state or federal OSHA regulations. Conduct the required trainings, review the OSHA Checklist on p. 86, and encourage every team member to help keep the practice safe and compliant. OSHA compliance gives employees confidence and creates a culture of safety and prevention. ■



Turn the page for a handy checklist that can help you determine how OSHA-compliant your practice is.

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Dental practices must be able to pass OSHA inspection.
Use this checklist to see how compliant yours is.

- OSHA Bloodborne Pathogen Training conducted annually and documented.
- Keep documentation of training for 3 years.
- Hepatitis B vaccination offered to clinical employees within 10 days of employment.
- Documentation of immunity to hepatitis B vaccination on file.
- If employee declines hepatitis B vaccine, employee signature on file.
- Is your OSHA manual up to date? If not, get a new one or use models from the OSHA website.
- Is an OSHA poster present? If not, download a free one from the OSHA website.
- Is a copy of the Bloodborne Pathogen standard available? If it's not in your OSHA manual, download one from osha.gov. Also, check your state's OSHA website to see if there is a state-specific Bloodborne Pathogen standard.
- Ensure employee record-keeping and health forms are on file.
- Keep record-keeping and health forms for the duration of employment, plus 30 years.
- Eyewash station working properly—cold water only, with a sign to designate its location.
- Fire extinguishers mounted on wall, currently charged, inspected or replaced annually.
- Emergency exits marked and unobstructed.
- Inspection of office for safe work conditions, eliminating electrical and trip-and-fall hazards.
- Evacuation plans and protocols reviewed. If you don't have evacuation plans, download samples from the eTools section of OSHA's website.
- First-aid kit available for employees to use for minor cuts and injuries.

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Checklist

(Note: This list is not all-inclusive. To see your particular state and federal regulations, go to osha.gov and search state plans.)

- Hand hygiene policies in place.
- Exposure-incident protocol current, reviewed annually.
- Personal protective equipment (PPE) provided: clinical jackets; protective eyewear; masks; exam and utility gloves.
- Personal protective attire is provided at no charge to employees.
- Reusable clinical jackets laundered and maintained by employer at no charge to employees.
- Engineering controls, such as needle recapping devices or safety syringes, used.
- Annual review and evaluation of safer sharps devices.
- Work practice controls employed to reduce risks when handling sharps.
- Hazard communication standard followed:
 - Inventory of hazardous substances.
 - Organize safety data sheets for each hazardous substance.
 - Place labels on containers not identified (secondary containers).
 - Inspect all chemical containers for leaks.
 - Employee training on proper use of and handling of hazardous substances.
 - PPE provided for handling chemicals.
 - Training and information on chemical spills, disposal and cleanup.

- Sharps containers located as close as possible to where sharps are used; must be spill-proof and puncture-resistant, red or orange-red, with a "biohazard" label.
- Provide explanation of what labels, signs and symbols mean (chemical, biohazard, radiation, etc.).
- Ergonomic plan to reduce incidents of musculo-skeletal injuries. ■

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