

## **Achieving OSHA Sharps Safety Compliance in Non-Hospital Settings**

### ***What does OSHA require in non-hospital settings?***

- Exposure control panel
- Universal precautions
- Engineering controls- identify, evaluate, select, implement and train with input from frontline workers
- Work practice controls
- PPE: gloves, gowns, eye protection and masks (no cost to employee and with easy access)
- HBV vaccinations
- Post-exposure evaluation and follow-up if exposure incident occurs
- Labels and signs for regulated waste, laundry and other contaminated equipment
- Worker training pre-assignment and annually
- Recordkeeping (facilities/catastrophes; report in 8 hours)

### ***Is your facility covered under OSHA?***

- State/municipal facilities in state plans are covered, non-state plans are not
- Small employers ARE covered by BBP
- Recording and reporting: if less than 10 employees then you are NOT required to keep OSHA Logs or Sharps Injury Log
- DO need to keep medical records for employees (vaccinations, follow-ups, etc.)
- Must implement and train on new devices (and should have sufficient documentation of those activities)

### ***Advice on Compliance***

- SED training must be yearly and include an in-depth explanation of the device followed by an evaluation. Attendance is mandatory. The best way to achieve successful training is by making it as interactive as possible through audio visual aids and samples.
- A cross-section of staff must have input and annual documentation must be completed. Evaluations must be conducted with front line employees using standardized forms.
- Achieve consensus in selection, implement and monitor compliance with use. Notify staff that these devices have come in and are available for use. Implement the use promptly after appropriate training. It is the employer's responsibility to enforce and to monitor compliance.
- Do not assume that the cost of these devices exceeds the cost of traditional devices. Improvements in design and cost have been made, and prevention is cost-effective. The purchase and training costs are nothing compared to costs of sharp injuries.

- The Needlestick Safety and Prevention Act is multi-faceted. Leadership buy-in is essential for compliance: take action, inform employees and be really proactive about it. Do not use first generation safety devices if there are newer devices. The exposure control plan is the key document to assist your organization and implement the use of these safety devices.
- The individual who is responsible for training staff members must be knowledgeable in this topic and must demonstrate that they do have credentials. Live training is the best training because there is an opportunity to ask questions and respond. Use lectures, PowerPoint, interactive tools and encourage audience participation. Then document the details in an outline form. Include the name of the attendees, the individual who conducted it and the date.

#### ***Benefits of Compliance***

- A safer, more healthful work environment: lower workers compensation costs, compliance with BBP standard
- Enhanced productivity due to fewer days away from work
- Remain competitive in recruitment