



**Things to Know**

**Annual OSHA Employee  
Training & Certification**

**Intro to GHS & HIPAA**

**Omnibus Rules**

**Training Handout**

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This handout is very comprehensive. It is designed to serve as a reference tool to use when you are back at your dental office to cross-check OSHA laws that you will learn today. It also serves as a great training tool to use with new hires / part-time employees. **If you would like to write notes during today's presentation we suggest using the page provided below as the information in this presentation is comprehensive and moves rather quickly.** Thank you JILL OBROCHTA RDH BS

### **INTRO & FACTS ON OSHA:**

- **All Employees must be OSHA Trained annually** \_\_\_\_\_
- **Required OSHA Paperwork is key!** \_\_\_\_\_
- **So are OSHA Facility Protocols!** \_\_\_\_\_
- **Schedule your OSHA Safety Facility Report** \_\_\_\_\_
- \_\_\_\_\_

### **FOUR COMPONENTS OF OSHA ANNUAL TRAINING INCLUDE:**

#### **I. Hazard Communication Plan**

- **Keep USA MSDS for 30 years** \_\_\_\_\_
- **Keep USA Haz-Com Labels at Point-of-Use / June 2016** \_\_\_\_\_
- \_\_\_\_\_

#### **NEW HAZARD COMMUNICATION PLAN / GLOBAL HARMONIZATION SYSTEM / GHS**

- OSHA / GHS required for all dental office employees **by Dec. 1, 2013**
- Begin to convert **USA MSDS Sheets** to **International SDS Sheets** (Ongoing Update)
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- \_\_\_\_\_
- **Pictogram Symbols** replace **USA Hazard Rating Symbols**
- **USA Hazard Rating Symbols** need to be **at Point-of-Use** through June 2015
- \_\_\_\_\_
- \_\_\_\_\_

#### **II. Exposure Control Plan**

- Dental Employees are exposed to both Chemical & Infectious Waste Hazards
- \_\_\_\_\_
- \_\_\_\_\_

#### **III. Bio Medical Waste Plan & Blood Borne Pathogens**

- Point-of-Use Disposal:
  - Red Bags: \_\_\_\_\_
  - Sharps: \_\_\_\_\_
  - Glass Carpules / Dual Waste Containers: \_\_\_\_\_
- View Videos at: [www.wastewise.com](http://www.wastewise.com) \_\_\_\_\_

#### **IV. Sterilization & Disinfection** OSHA requires you monitor and show proof of these (3) things:

- **Bio Hazard Waste Pick-Up Receipts or Mail Back Container Logs:**  
Keep receipt chronological by month or Log of Mail-Back / Save for 3 years
- **Spore Strip Monitor Reports:** 3<sup>rd</sup> Party Monitoring is Best Practice  
Weekly for most States / Monthly for Florida (FL) & Arkansas (AR)
- **Cold Sterilization Solutions:** Must keep a Log of change / Written Proof.  
*\*\*Mail-Back / Pour-n-Cure Containers for BMW Disposal Alternatives for Sharps & Soft Waste are a less costly alternative\*\**

#### **HIPAA OMNIBUS RULES:** Massive Change to HIPAA--**September 23, 2013**

- Add all required HIPAA Omnibus Rule Protocols within your office--- There are many!
- You must have a **new HIPAA Manual** written to **new HIPAA Omnibus Rule** standards
- **Employees must have Proof-of Training, New Patient Forms & Business Associate Agreements**
- **Best Practices Daily Data Back-Up: Business Continuity System / DDS Rescue**
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- \_\_\_\_\_

#### **OSHA (Occupational Safety & Health Association)**

- OSHA is about *EMPLOYEE* safety
- **All** U.S. businesses must provide **Annual OSHA Employee Training** with proof-of-training in (4) required areas on 27+ topics **to all employees.**
- **(15) States are required to provide an Injury & Illness Prevention Program**  
**Arkansas, California, Hawaii, Louisiana, Michigan, Minnesota, Mississippi, Montana, North Carolina, New Hampshire, Nevada, New York, Oregon, Utah & Washington**
- OSHA training covers what the *EMPLOYER* needs to provide  
Many aspects cross-over into Public Safety (patient's safety)

- OSHA was created in 1980s to prevent workplace injury
- Blood Borne Pathogens Plans were added in 1991 to protect patients & workers
- OSHA & Health Department Inspectors will look at Blood Borne Pathogens Records
- Inspections can happen at any time but, are typically a result of an Employee or Patient reporting
- OSHA Safety is about your safe behavior at work, facility being safe & required OSHA paperwork!
- Use your OSHA Facility Credentialing Report: 72-points checklist from [DentalEnhancements.com](http://DentalEnhancements.com)  
It's based upon the last 15 years of OSHA Dental Office fines; Customized to your office with specific recommendations instantly emailed to you upon completion via a phone interview.  
Use this as your OSHA Checklist. (HIPAA requirements will appear on your report too!)

Four Components of OSHA Annual Training include:

## II. Hazard Communication Plan

- Understand Work *Chemicals* & Professional Products: How they may be *Hazardous*
- How they may cause *Bodily Harm / Health Hazard*
- Identify Symptoms of *Chronic / Acute* Chemical Exposure
- (4) Pathways a Chemical can enter the body: Inhale, Ingest, Inject, Absorb
- Identify *Safety Measures* to protect yourself against harm / Notify Management if you feel sick
- All Team members must be trained on Hazardous Chemicals **prior** to starting a job
- Employees must know how to respond in a Chemical Emergency

## **New Hazard Communication Plan / Global Harmonization System / GHS**

### **Employee Proof-of-GHS Training due by: December 1, 2013**

- OSHA / GHS --- **Global Harmonization System** required for **all** dental office employees
- Begin to convert **USA MSDS Sheets** to **International SDS Sheets** by June 1, 2015 & ongoing Updates
- SDS must be accessible to ALL EMPLOYEES = 24 hours / on-line accessible is desirable
- SDS requires (2) varying formats of back-up: Paper/ Cloud/ Internet or Digital
- ALL Employees **must know how to access** the 24 hours SDS Library
- Save USA MSDS for 30 years as Proof-of-Chemical-Exposures
- Organize MSDS & SDS: IN (2) SEPARATE MANUALS: alphabetically with a Master List  
Your Dental Supplier may offer Internet Hosted Library for Free or for Fee
- GHS requires Proof-of-Training in: International SDS + Pictogram Symbol Meaning
- Pictograms will be provided by manufacturers on all products by June 2015
- You must **make Pictogram Labels** for: re-pour / sub-container or unboxed small items
- Best way to make Pictogram is: **Phone Photo—email—print & affix** to container  
or use our **Pictogram Labeling Sheets at Point-of-Use** to list product
- Choose a **comprehensive GHS compliance solution** that includes:  
**Training, Paperwork, Facility Protocols**  
[Choose a Complete Compliance Solution for your OSHA / GHS Office Protocols](#)

## II. Exposure Control Plan

- Dental Employees are exposed to both Chemical & Infectious Waste Hazards
- Each Dental Professional's job, has a different Occupational Risk
- Occupational Hazard Exposures need to be categorized, rated, be in written form & signed by each employee.
- **These are the required OSHA Employee Documents:**
  - **Annual OSHA Employee Proof-of-Training**
  - **Occupational Exposure** per Job Title
  - **Hep B Vaccination** Records
  - **GHS Proof of Training**
  - **Employee Medical History** (keep separately)
- OSHA Training Records to be kept for (3) years with OSHA Manual
- Make sure all OSHA Manuals & Forms are quickly producible for Inspectors
- **OSHA Manual must be updated to GHS Standard (new since Dec.1, 2013)**

## III. Bio Medical Waste Plan & Blood Bourne Pathogens

- Every Employee should update Blood Bourne Pathogens Training --Annually
- **What should you put in the Red Bag?** **Splattered** or **Saturated Waste?**  
CDC / Law is to dispose of "**saturated waste**" (blood or saliva soaked)
- Small Red Bag, Small Sharps & Dual Waste Container must be at **point-of-use** in each operatory
- Glass Carpules need to be disposed of in **Dual Waste Containers** /EPA law
- Do not walk with biomedical waste or sharps / Dispose of at Point-of-Use
- **Do not toss Extracted Teeth with Amalgam into Sharps Container**—
- Use Amalgam Recycling Containers for Amalgam Scrap, Capsules, Traps, Filters & Teeth
- Blood & Saliva Saturated Waste should be placed in Red bags
- Use either Red Bag + Sharps w/ Hauler or Rigid EPA approved Mail Back Containers
- Lg. Red Bag must be kept on hard surface
- All red bags/ mail-backs must have 24-Hour Contact Information of Dentist
- Bio Medical Waste Plan must be up-to-date in OSHA / GHS Manual
- Use **Spill Kit** for blood or chemical clean ups
- Use Personal Protective Equipment (PPE) & Universal / Standard Precautions
- Make sure all PPE fits properly and ask/ tell employer if you need more PPE

### **More OSHA Safety Standards Exposure & Injury at Work:**

#### **ALWAYS USE UNIVERSAL/ STANDARD PRECAUTIONS**

- If Needle Stick—Seek Help / Use OSHA Form 300 & 300A / Some States have additional Logs  
\*\*Check with D/E Trainer or our Website for STATE REQUIRED OSHA PROTOCOLS\*\*
- Fill in all Required Injury Reports within 48 hours of Incident  
\*\*D/E OSHA Manual has all forms you need / D/E Trainers will coach you through this process should you need guidance\*\*
- Employer required to pay for all Injury Fees / Report to Workman's Comp
- Employee Entitled to Hepatitis B Vaccine / **OHIO** & **MICHIGAN** require Physicians Note
- Hepatitis B Vaccine Series needs only to be done once-in-Lifetime--- Paid for by Employer  
**Hep B Boosters not required; but employee may want to have done for added protection**
- Tuberculosis: On the rise in 2010; Use only Medical Grade (wipe or spray) to kill TB when disinfecting treatment room. Alcohol wipes do not kill TB!
- Tuberculosis is airborne contagious; identify patients & Use PPE +Precautions

#### IV. **Sterilization & Disinfection**

OSHA requires you monitor and show proof of these (3) things:

- **Bio Hazard Waste Pick-Up Receipts or Mail-Back Logs:**  
Keep receipts or log chronological by month / Save for 3 years
  - **Spore Strip Monitor Reports:** 3<sup>rd</sup> Party Monitoring is Best Practice  
Weekly for most States / Monthly for Florida (FL) & Arkansas (AR)
  - **Cold Sterilization Solutions:** Must keep a Log of change / Written Proof.  
\*\*Pour-n-Cure Containers for Bio Hazard Waste Alternatives for Sharps & Soft Waste are a less costly alternative\*\*
- **Influenza pandemics** : Be cautious with sick patients , wipe all common door knobs
  - **Use proper hand washing techniques** with antibacterial medical grade soaps for 2 minutes
  - Save and organize Monitors & Receipts in a 3-ring binder / Keep for 3 years
  - Spore Test: Most States Once per week (FL & AR = once per month)
  - Save Bio Med Waste Pick-Up Receipts or Log Pour-n-Cure Usage
  - Monitor Cold Sterile Solutions by using a log or calendar
  - Puncture Proof Utility Gloves required for each employee when handling soiled instruments
  - All Employees need to have an updated Medical History / kept under security
  - Employer to keep Employee Records for 30 years
  - Assign an OSHA Key Contact Person
  - **KNOW WHERE YOUR OSHA & HIPAA MANUALS ARE KEPT in case of OSHA Inspection**

#### **More OSHA Safety Standards**

- Make sure your team is First Aid Capable & Keep CPR Current
- Working Eyewash Station with sign is required
- Know where Defibrillator is kept; Check its batteries and operation; New ADA Standard of Care
- You must: Practice Fire & Emergency Exit Drills
- Fire Extinguishers, Exits Signs, Posted Routes of Egress must be to Code
- Have all Required OSHA Posters: Get a comprehensive, ALL-IN-ONE POSTER: [www.complianceposter.com](http://www.complianceposter.com)
- **New U.S. Safety Poster Laws 2012:**  
Must post the OSHA WHISTLE BLOWERS PROTECTION LAW  
Each workplace must provide proof of QUARTERLY SAFETY UPDATES / Keep a log
- **Post Federal Injury Log 300 & 300A** / Injury form to send to CDC at end of year to report injuries
- Post all State + Federal Required Posters & Injury Logs
- Keep your First Aid Kit current: Antihistamine, Aspirin, Epi-Pen, Sugar Icing, Bandages & Ointment  
Keep Fainting Salts in each operatory ( Best Practices)
- Eating & Drinking is prohibited. Eat & drink only in a designated lunch area
- Keep Food & Dental Products separated; label fridge drawer or tub; **DENTAL PRODUCTS ONLY**

#### **In 2004 OSHA & ADA formed an Alliance:**

- Practice proper **Ergonomics** at work
- Sit and work with proper posture
- Safeguard against repetitive motions
- Do Dental Yoga---Breath & Stretch often at work!  
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- **Protect your Hearing**---
- Noise Levels of 100 dB with air turbines are harmful
- OSHA guidelines allows: 8hours exposure/ 90-dB sound pressure level
- Older handpieces produce 100 dB or more. Allowable exposure 2 hours / day
- Earplugs must be offered to Employees exposed to turbine or Ultrasonics; Get Hearing Tested

**More OSHA Safety Standards**

- **Make all Biohazards known** by posting Biohazard Stickers to denote such within your office
- **Be safe with Electrical Outlets & Moisture** near Ultrasonic Unit & Heat Sterilizers
- **As of 2006, Catastrophe Contingency Plan is required (written)**  
Get or create a Natural Disaster & Homeland Security Written Plan from a reliable OSHA resource  
Make an Employee Emergency Contact Phone Number Log – share it!
- Water in dental units must be at 500 microns or less
- Test each dental chair that uses municipal water at least once per year
- You have the Right to a SAFE WORKPLACE---Report violence and potential hazards
- Report any other hazards to Management

**HIPAA REVIEW & *New Omnibus Rule* Requirements:****Due in place by September 23, 2013**

- HIPAA originated to provide better portability of health insurance & limit rate increases
- HIPAA now safeguards: Job Discrimination, Right to Privacy & Security or PHI
- Private Health Information (PHI) must be kept private—Office use only
- Employees cannot share, misuse or keep PHI

**HIPAA Standards have a Massive Change September 2013: *New HIPAA Omnibus Rules***

- Add all required HIPAA Omnibus Rule Protocols within your office--- There are many!
- You must have a **new HIPAA Manual** written to **new HIPAA Omnibus Rule** standards
- You must assign a HIPAA Privacy Officer & HIPAA Compliance Committee / Written Format
- You must have **new HIPAA Notice of Privacy Practice with Omnibus Rules**  
displayed in office and posted on your website if you have one; Federal Requirement
- Train ALL Employees to the **new HIPAA Omnibus Rule Standards**  
& have **proof-of-training** and **confidentiality agreement** with each employee
- Have ALL patients sign a **new HIPAA Patient Acknowledgement Form to Omnibus Rule** Standards
- Have ALL Business Associates sign a **new HIPAA Business Associates Agreement to Omnibus Rule** Standards
- Understand all **new Marketing & Selling / Dispensing Rules under HIPAA Omnibus Rules**
- Understand **new Patient Notification & Sign-offs authorizations under HIPAA Omnibus Rule**
- Update **Outgoing Email, Internet & Computers** all to HIPAA Omnibus Rule Standards
- **Microsoft XP will not be HIPAA compliant as of April 8, 2014; Must upgrade to Windows 7 or 8**
- **Outgoing Emails Require Encryption**; Add an SSL or Encryption Software / talk to your IT Specialist
- **Daily Data-Back Up must be Off-site & Encrypted**. Avoid using back-up drives / discs to take home  
Use of these provoke large fines from HIPAA Auditors as they can get lost or stolen
- Best Practices for Daily Data Back-Up: Business Continuity System from DDS Rescue
- Protect Out-Going Email with Validation Protocol or Email Encryption Software  
**Choose a Complete Compliance Solution for your HIPAA Omnibus Rule Office Protocols**

**Older HIPAA Rules that still prevail:**

- **Red Flag Rule** is ADA recommended / ID and fraud protection plan
- **Data Back-Up & Contingency Plan**: Required and you need to update regularly  
Use D/E's **Annual Data Back-Up & Contingency Report** with your IT Specialist at least annually
- HIGH TECH LAW still federally required for all dental offices as of FEBRUARY 2010!!