



WHITEPAPER



OSHA SAFETY TRAINING BASICS FOR

HEALTH CARE:

What you need to know



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OSHA SAFETY TRAINING BASICS FOR HEALTH CARE: *WHAT YOU NEED TO KNOW*

WHO IS CONSIDERED PART OF THE HEALTHCARE INDUSTRY?

The healthcare industry includes hospitals, clinics, dental offices, out-patient surgery centers, birthing centers, and nursing homes. In addition to the medical staff, large healthcare facilities employ a wide variety of trades that add additional health and safety hazards. These include mechanical maintenance, medical equipment maintenance, housekeeping, food service, building and grounds maintenance, laundry, and administrative staff.

WHAT TRAINING IS REQUIRED?

Healthcare workers may be familiar with practices and requirements from such organizations as The Joint Commission and Centers for Medicare and Medicaid Services, which primarily are concerned with the quality of patient care. The Joint Commission provides standards aimed at helping healthcare providers attain a high level of quality and performance. However, when it comes to worker safety, healthcare workers and their employers must comply with requirements from the Occupational Safety and Health Administration (OSHA).

Employee training is a common topic of concern and discussion among safety professionals in health care. The subject generates numerous questions like:

- ▶ What training is required and what do we need?
- ▶ What does OSHA expect in a training program?
- ▶ What conditions trigger refresher training?
- ▶ What are the risks of noncompliance?
- ▶ Are our training records acceptable?

STATE-PLAN STATES:

ALASKA
ARIZONA
CALIFORNIA
CONNECTICUT
HAWAII
ILLINOIS
INDIANA
IOWA
KENTUCKY
MAINE
MARYLAND
MASSACHUSETTS
MICHIGAN
MINNESOTA
NEVADA
NEW JERSEY
NEW YORK
NEW MEXICO
NORTH CAROLINA
OREGON
PUERTO RICO
SOUTH CAROLINA
TENNESSEE
UTAH
VERMONT
VIRGIN ISLANDS
VIRGINIA
WASHINGTON
WYOMING

We'll take a look at each of these and give you some practical information and ideas to help you get and stay in compliance with OSHA's training requirements for health care.

If you are a private, state, or federal healthcare establishment in the U.S., the first place to look for training requirements is in the OSHA standards and state-plan standards. Many states and territories have been approved by OSHA to operate their own safety and health programs, and these are known as state-plan states.

Federal OSHA covers private employers and federal places of employment but does not cover state or local government workers. However, state plans cover public employers (state-, county-, or local-government employers) as well as private-sector employers. To make matters more complicated, several state plans apply only to public-sector employers. Private-sector employers in these states must comply with Federal OSHA.

State-plan states must have standards that are at least as effective as OSHA's rules, but they may have additional requirements that could involve employee training.

If you're in one of these state-plan states, you'll need to meet the training requirements in your state. Many of these states adopt Federal OSHA rules "as is," but this isn't always the case.

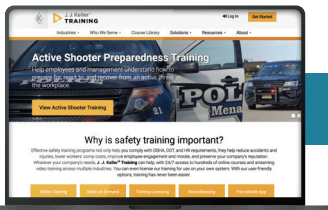
WHAT ARE COMMON TRAINING TOPICS?

Now that you know where to look for the requirements, what are some of the topics that contain required training specific to the healthcare industry? Some of those topics could include bloodborne pathogens (for workers with occupational exposure), formaldehyde exposure, ionizing radiation, hazard communication (including Safety Data Sheets and labeling), emergency action planning, injury and illness reporting, workplace violence, ergonomics and proper patient lifting and moving techniques, and how to use and care for all required personal protective equipment (PPE).



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WHAT TRAINING DO WE NEED IN THE HEALTHCARE INDUSTRY?

Healthcare workers face serious hazards – many of which can be surprisingly dangerous. According to the Bureau of Labor Statistics, the likelihood of injury or illness resulting in days away from work is higher in health care than in the construction or manufacturing industries.

Whether or not a particular OSHA standard applies depends on your facility's activities and the hazards faced by your employees, rather than the industry your business is in. One example: If any of your employees are assigned to workplaces where there is exposure to formaldehyde at or above 0.1 ppm, those employees would need specific training related to the potential health hazards associated with exposure.

As another example, only those workers who have occupational exposure to blood or other potentially infectious materials are required to have bloodborne pathogen training. One could argue that clerical staff with no patient interaction at a healthcare clinic may be exempt from the training requirements under this standard. However, janitorial staff may have reasonably anticipated exposure to blood in healthcare settings.

Depending on job duties, different employees likely need training on different topics. Keep in mind also that some OSHA standards require annual training and retraining.

WHAT UNIQUE SAFETY TRAINING CHALLENGES EXIST IN THE HEALTHCARE INDUSTRY?

The cost to train healthcare workers includes the cost for workers' time during the training, the number of workers to be trained, and the frequency of training depending on their job duties or level of risk to employees and the duties they are expected to perform.

The COVID-19 pandemic left little to no time for anything other than treating the rapidly growing number of patients and completing only essential tasks. The ripple effects are still being felt across the country.

Long hours and staffing shortages are also top concerns, resulting in limited hands-on and effective training opportunities.

DO WE NEED TO HOLD MONTHLY SAFETY MEETINGS?

Another common question relates to having monthly safety meetings. Federal OSHA doesn't require employers to hold regularly scheduled training or other general safety meetings. However, employers should regularly communicate with employees about workplace safety and health matters. That being said, certain states do require safety committees, which may require more frequent safety meetings.

Even though regular safety meetings may not be required, they're a good way to keep the lines of communication open. And, if you have to cover numerous topics for annual training, you might find it more convenient to discuss one topic each month.

WHAT DOES OSHA EXPECT IN A TRAINING PROGRAM?

Employers often ask about training program content or how training should be conducted. Some of the most common questions follow.

IS IT OKAY TO USE COMPUTER-BASED TRAINING PROGRAMS?

OSHA interpretations indicate that computer-based and video-based training used alone is not enough. The agency expects computer-based and video-based training to be supported by qualified trainers who can provide answers to the trainees' questions at the time the questions arise.



STATES THAT MANDATE SAFETY COMMITTEES FOR ALL OR CERTAIN EMPLOYERS:

Alabama, California, Connecticut, Minnesota, Montana, Nebraska, Nevada, New Hampshire, North Carolina, Oregon, Tennessee, Vermont, Washington, West Virginia.



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HAS DETAILS ON
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OSHA also says training should provide “hands-on” demonstrations and opportunities for trainees to practice using equipment and following procedures. It’s clear that OSHA expects computer-based training to be only a part of a training program.

WHAT ABOUT REFRESHER PROGRAM CONTENT?

Refresher training should:

- ▶ Highlight and summarize the important parts of the topic,
- ▶ Report on the group’s progress,
- ▶ Emphasize any changes that have occurred since the previous training was held, and
- ▶ Provide the opportunity to introduce more advanced material.

There’s no general requirement that applies to all refresher training. If a standard has details on the content of refresher training, be sure to follow those requirements. For example, the bloodborne pathogens standard says that retraining “shall be provided within one year of their previous training” and “when changes...affect the employee’s occupational exposure.”

Many OSHA standards do not require scheduled refresher training, but still outline when refresher training is necessary. For example, the Personal Protective Equipment Standard does not require annual training but does say that retraining may be required in certain cases, such as when there are indications that employees didn’t understand the previous training.

WHAT ARE THE RISKS OF NONCOMPLIANCE?

If you're ever tempted to cut costs by sidelining training, consider the consequences.

If you don't provide training, you're at risk for some hefty OSHA fines. Training violations are typically cited as "serious" with a maximum fine of \$15,625.

Of course, the other risk of noncompliance is a workplace injury, illness, or fatality. When someone isn't sure of what they're doing, they have an increased risk for injury. Injuries and illnesses come with costs that are likely to be higher than OSHA fines. The obvious direct costs include medical bills, repairs to any damaged equipment, product losses, and costs to hire and train replacement workers.

You also need to consider the indirect costs, such as decreased morale and productivity in coworkers, increases in your workers' compensation premiums, and your reputation in the community if the injury, illness, or fatality is publicized.

WHAT ARE OSHA'S REQUIREMENTS FOR TRAINING RECORDS?

There is no one OSHA requirement for training records that applies in all situations. The requirements vary from standard to standard. Many rules don't include training record requirements.



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Here are some examples of when OSHA does require training records:

- ▶ The bloodborne pathogens standard states that training records must include the dates of training, the contents of the training sessions, the names and qualifications of trainers, and the names and job titles of those trained. You have to keep these records for three years.
- ▶ Under the formaldehyde standard, the employer must provide specific information to physicians who conduct medical exams, maintain a record of the training program contents, provide all materials relating to the program to employees and to OSHA upon request, and retain exposure monitoring and medical surveillance records for the duration of employment plus 30 years.

Make sure you check the training records in each applicable rule to find out if training records are required, what OSHA wants you to include on the training records, and how long OSHA expects you to keep the records.

Even when training records aren't required, you may want to keep them anyway as a way to help organize your training program. Consider including the employee's name, the date of the training, the name of the trainer, and the topic covered. Remember the training rule of thumb: If you can't prove that training took place, it never happened!

HOW LONG DO WE HAVE TO KEEP TRAINING RECORDS?

Sometimes a rule will tell you how long to retain the training records, but more often than not, there is no record retention requirement.



If a rule doesn't specifically require a record retention time, an employer could set a policy to retain training records for a certain number of years or even for a period after employment has ended. This would be up to the employer.

Keep your training records up to date. If OSHA visits, you must be able to produce the record from the employee's most recent training.

HOW DO OSHA COMPLIANCE OFFICERS USE TRAINING RECORDS?

A primary reason for keeping training records is because OSHA requires them. But what does OSHA look for in training records, and how does a compliance officer (inspector) use them during an inspection?

OSHA inspectors will ask to see your training records when the OSHA standard in question requires you to keep the records. They'll pay attention to how much trouble it is for you to find the records. This gives them an indication of how well organized your training program is. When you can produce the records without delay, you show that your company pays careful attention to training.

Aside from training records, OSHA inspectors evaluate your compliance by asking employees about the training they've received. If workers praise the training program, you'll be in good shape. If many employees don't remember their training, or give negative feedback about the training, OSHA will take a closer look at:

- ▶ Your training records,
- ▶ The materials you use to train,
- ▶ The methods you use to provide training, and
- ▶ The knowledge of your instructors.



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HOW CAN WE USE TRAINING RECORDS?

After you've prepared the training records, don't just leave them to sit in a file. Training records have several uses during day-to-day operations. Use your records to:

- ▶ Help determine when annual refresher training is required.
- ▶ Keep track of an employee's qualifications for a particular job assignment. If you see someone doing a job that requires specialized training, you can easily check to be certain they've received that training.
- ▶ Help you identify workers who have a solid training history and may be ready to handle more specialized training for jobs with more responsibility.

You aren't the only one who wants to know if the training program is effective. You should be prepared to periodically submit reports to management on:

- ▶ What training has taken place,
- ▶ Who's been trained,
- ▶ How much time was devoted to training,
- ▶ What training materials are available,
- ▶ How well training objectives have been met,
- ▶ How training has improved safety, and
- ▶ What training is planned for the future.

WRAP UP

A good way to approach safety training in the healthcare industry, or any industry for that matter, whether required by an OSHA rule or not, is to:

1. Explain the hazards.
2. Let employees know what you're doing to control the hazards.
3. Show employees what you want them to do to stay safe.
4. Make sure the employees understand what you've told them.
5. Follow up with observations to make sure employees are putting the training into practice.

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Popular OSHA safety training topics include:

- Bloodborne Pathogens
- First Aid Basics
- Hazard Communication
- Emergency Preparedness & Response
- Lockout/Tagout
- Personal Protective Equipment (PPE)
- Respiratory Protection
- And More

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ABOUT THE AUTHOR

ROBIN MARTH J. J. KELLER & ASSOCIATES, INC.

Robin Marth, CSP joined J. J. Keller & Associates, Inc. in 2021 as an Editor on the Environmental, Health & Safety Publishing Team. She is an experienced EHS Specialist with a demonstrated history of working in the management consulting and manufacturing industry. Robin's professional skill set includes Workplace Safety Administration, Ergonomics, Environmental Management, and Motor Vehicle/Fleet Safety. Her editorial responsibilities include researching and creating content for several publications, including **Employee Safety Management Today** and the **OSHA Compliance for California** manual. Robin holds a CSP designation from the Board of Certified Safety Professionals and is also an OSHA Outreach General Industry Trainer.



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