

OSHA Compliance Checklist – ASC

Date _____ Inspectors _____

Facility _____

OSHA is the agency responsible for establishing and enforcing standards that will make the workplace safe and healthful for the employees. The way OSHA enforces these standards is by conducting OSHA audits. An audit is when an OSHA compliance officer comes out to the physical location of a company and checks to see if the company is in compliance with all the OSHA standards that are applicable for that type of business.

Many of OSHA's standards apply to the ASC industry, so, should an OSHA compliance officer arrive at your facility, they you need to be prepared show that your facility is in compliance. Items and areas to be checked are:

1. OSHA Log,
2. Written Safety Related Materials,
3. Posting Requirements,
4. Documentation of Training, and
5. Walk Through Inspection.

To use this form, simply review the material indicated by section and check off the procedures or elements required by OSHA. At the conclusion of the OSHA Compliance Check, each element of the standard that applies to your facility that is not marked off - indicates a potential OSHA citation.

1. OSHA Log

OSHA mandates that the employer keep records of occupational injuries and illnesses.
ASCs that are 100% owned by a Medical Doctor(s) is exempt from this requirement.

- Log of Work-Related Injuries and Illnesses (OSHA form 300)
 - ___ OSHA form 300 maintained by calendar year.
 - ___ Entries made within 7 calendar days.
 - ___ OSHA form 300 retained for 5 years.
- Summary of Work-Related Injuries and Illnesses (OSHA form 300A)
 - ___ Closed out and signed by a Company Executive at the end of the calendar year.
 - ___ Posted in a conspicuous place for all employees February 1 through April 30.
- Injury and Illness Incident Report (OSHA form 301 or equivalent)
 - ___ Supplementary record constructed within 7 calendar days of recordable case.

2. Written Safety Material Requirements

Many of the OSHA standards have a requirement that the employer shall develop, implement and maintain a written plan, policy, procedure, program or rule. In order to determine if the ASC is in compliance with this portion of the standard the compliance officer must see these written safety requirements. As the OSHA compliance officer reviews these written safety requirements, he/she is checking that the elements of each requirement are met and when was the last time the written requirement was reviewed – as many of the OSHA standards specify that the written safety requirement be reviewed at least annually.

The OSHA standards most applicable to the ASC with a written safety requirement include, but by no means is limited to the following (as each facility is different).

- Emergency Action Plan 1910.38 Last Reviewed: _____
 - ___ Emergency escape procedures & emergency escape route assignments.
 - ___ Procedure to be followed by employees who remain to operate critical operations.
 - ___ Procedure to account for all employees.
 - ___ Rescue & Medical duties identified for those assigned.
 - ___ Preferred means of reporting fires and other emergencies.
 - ___ Names or job titles of persons who can provide further information.

- Fire Prevention Plan 1910.39 Last Reviewed: _____
 - ___ A list of the major workplace fire hazards.
 - ___ Names or titles of persons responsible for fire prevention maintenance.
 - ___ Names or titles of persons responsible for control of fuel source hazards.
 - ___ Housekeeping procedure for the control of fire hazard accumulation.
 - ___ Maintenance procedures for heat producing equipment.

- Compress Gas Cylinders 1910.101 Last Reviewed: _____

Standard refers to Compressed Gas Association pamphlet P-1-1965

 - ___ Handling Cylinders
 - ___ Moving Cylinders
 - ___ Storing Cylinders
 - ___ Cylinder Usage

- Hazardous Waste Operations 1910.120 Last Reviewed: _____
 - ___ An organizational structure.
 - ___ A comprehensive workplan.
 - ___ Site-specific safety and health plan.
 - ___ Medical surveillance program.
 - ___ Standard Operating Procedure for safety and health.
 - ___ Any necessary interface between general program and site specific activities.

- Workplace Hazard Assessment for PPE 1910.132(d) Last Reviewed: _____
 - ___ Workplace evaluated identified.
 - ___ Person certifying that the evaluation has been performed.
 - ___ Date(s) of the hazard assessment.
 - ___ Document identified as a certification of hazard assessment.

- Respiratory Protection 1910.134(b) Last Reviewed: _____
 - ___ Standard Operating Procedure for respirator selection.
 - ___ Medical Questionnaire for employee use.

- ___ Maintenance of respirators.
 - ___ Inspection of respirators.
 - ___ Work area surveillance.
- Permit Required Confined Space 1910.146 Last Reviewed: _____
- ___ Identify and evaluate the hazards of permit spaces before employee entry.
 - ___ Develop and implement the means, procedures, and practices necessary for safe entry.
 - ___ Provide equipment.
 - ___ Evaluate permit space condition.
 - ___ Provide at least one attendant outside.
 - ___ Designate the persons who are to have active roles.
 - ___ Develop and implement procedures for summoning rescue and emergency services.
 - ___ Develop a system for the preparation, issuance, use and cancellation of entry permits.
- Control of Hazardous Energy 1910.147
- ___ Energy Control Plan 1910.147 (c) Last Reviewed: _____
 - ___ Procedures for energy control.
 - ___ Employee training
 - ___ Periodic inspections (at least annually)
- Bloodborne Pathogens 1910.1030
- ___ Exposure Control Plan 1910.1030(c) Last Reviewed: _____
 - ___ Exposure determination
 - ___ Schedule and method of implementation of:
 - Methods of compliance
 - HIV and HBV Research Laboratories and Procedure
 - Hepatitis B Vaccination and Post-Exposure Evaluation and Follow-up
 - Communication of hazards to employees
 - Recordkeeping.
 - ___ Procedure for the evaluation of circumstances surrounding exposure incidents.
- Ethylene Oxide 1910.1047 Last Reviewed: _____
- ___ Workplace assessment for permissible exposure limit (pel)
 - * maximum pel 8-hour time-weighted average 1 ppm
 - ___ Periodic monitoring by breathing zone air samples representative of 8-hour time-weighted average and 15-minute short-term
- Formaldehyde 1910.1048 Last Reviewed: _____
- ___ Workplace assessment for permissible exposure limit (pel)
 - * maximum pel 8-hour time-weighted average 0.75 ppm
- Hazard Communication 1910.1200(e) Last Reviewed: _____
- ___ Procedure for labels and other forms of warning.
 - ___ Procedure for Material Safety Data Sheets.
 - ___ Procedure for Employee information and training.
 - ___ A list of hazardous chemicals known to be present.
 - ___ Methods to be used to inform employees of the hazards of non-routine tasks.
- Occupational Exposure to Hazardous Chemicals In Laboratories 1910.1450
- ___ Chemical Hygiene Plan 1910.1450 Last Reviewed: _____
 - ___ Standard operating procedures relevant to safety and health.

- ___ Criteria used to determine and implement control measures.
- ___ Provisions for employee information and training.
- ___ Pre Activity procedure.
- ___ Provisions for medical consultation and medical examination, if needed.
- ___ Personnel responsible for implementation of the Chemical Hygiene Plan.

□ Ergonomics (General Duty Clause) Last Reviewed: _____

- ___ Full Ergonomic Program consisting of
 - ___ Management, Leadership and Employee Participation
 - ___ Hazard Information and Reporting
 - ___ Job Hazard Analysis and Control
 - ___ Training
 - ___ MSD Management
 - ___ Program Evaluation

□ Occupational Exposure to Tuberculosis (General Duty Clause): Last Reviewed: _____

- ___ Respiratory Protection Program consisting of:
 - ___ Procedure for employee screening (skin test/x-ray).
 - ___ Procedure for worker removal, in the event of contracted TB.
 - ___ Procedure for employee information and training.
 - ___ Isolation procedure for TB patients.
 - ___ Procedure for TB patient transfer.
 - ___ Medical Questionnaire.
 - ___ Summary Record.

3. Posting and Inspection Requirements

___ OSHA Form 2203 Job Safety and Health Poster or equivalent

1903.2 Each employer shall post and keep posted a notice or notices, to be furnished by the Occupational Safety and Health Administration, U.S. Department of Labor, informing employees of the protections and obligations provided for in the Act – such notice or notices shall be posted in each establishment in a conspicuous place or places where notices to employees are customarily posted. The employer shall further take steps to insure that such notices are not altered, defaced, or covered by other material.

___ Ladders – 1910.25(d)

- ladders shall be inspected frequently for serviceability

___ Confined Spaces – 1910.146(c)

- permit spaces shall be posted with danger signs (or equally effective means)

___ Portable Fire Extinguishers – 1910.157(c) & (e)

- employer shall assure that portable fire extinguishers are maintained in a fully charged and operable condition and kept in their designated places
- employer shall be responsible for the inspection, maintenance and testing of all portable fire extinguishers; annual maintenance check

___ Fixed Extinguishing systems – 1910.160(b)

- employer shall assure that inspection and maintenance dates are recorded on the container, container tag, or in a central location
- inspected annually by a person knowledgeable

___ Employee Alarm System – 1910.165(b)

- employer shall post emergency telephone numbers near telephones, or employee notice boards, and other conspicuous locations when telephones serve as a means of reporting emergencies

___ Slings – 1910.184(d)

- each day before being used, the sling and all fastenings and attachments shall be inspected for damage or defects by a designated competent person

___ Bloodborne Pathogens – 1910.1030(g)

- warning labels shall be affixed to containers of regulated waste, refrigerators and freezers containing blood or other potentially infectious material; and other containers used to store, transport or ship blood or other potentially infectious material
- sign shall be posted at the entrance to work areas of HIV and HBV Research Laboratory and Production Facilities.

___ Hazard Communication – 1910.1200(f)

- each container, containing hazardous chemical(s) shall be labeled, tagged or marked

4. Documentation of Training

Many of the OSHA standards have an employee training requirement. In order for the ASC to demonstrate compliance for employee training, the employer must show the OSHA compliance officer documentation of the training. Please keep in mind that many of OSHA's standards have a requirement that employee training be conducted upon initial assignment, whenever an employee changes job positions or a change in procedure and annually. Also note that not all employees need all training.

The OSHA standards most applicable to the ASC industry with an employee training requirement include, but by no means is limited to:

___ Emergency Action Plan 1910.38

- review the plan with each employee covered by the plan (initial hire, whenever employee responsibilities change, and whenever the plan is changed).
- parts of the plan employee must know to protect the employee in the event of an emergency.

___ Fire Prevention Plan 1910.39

- apprise employees of the fire hazards of the materials and processes to which they are exposed.
- parts of the plan employee must know to protect the employee in the event of an emergency.

___ Compressed Gas Cylinders 1910.101

- each employee who may have contact with compressed gas cylinders, shall be trained in their safe handling and storage.

___ Hazardous Waste Operations 1910.120

- training shall be based on the duties and function to be performed by each responder of an emergency response organization.

___ Personal Protective Equipment 1910.132

- when PPE is necessary
- what PPE is necessary
- how to properly don, doff, adjust, and wear PPE
- limitations of PPE
- proper care, maintenance, useful life and disposal of PPE

___ Respiratory Protection 1910.134

- why respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator
- what the limitations and capabilities of the respirator are
- how to use the respirator effectively
- how to inspect, put on and remove, use, and check the seals of the respirator
- what procedures are for maintenance and storage of the respirator
- how to recognize medical signs and symptoms that may limit effective use of respirator
- general requirements of the respiratory protection standard

___ Entry Permit Confined Space 1910.146

- the employer shall provide training so that all employees whose work is regulated by this section acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned.
- ___ Control of Hazardous Energy 1910.147
- employer shall provide training to ensure that the purpose and function of the energy control program are understood and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees.
 - o authorized – recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace and the methods and means necessary for energy isolation and control
 - o affected – purpose and use of the energy control procedure
- ___ Portable Fire Extinguishers 1910.157
- familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage fire fighting
- ___ Employee Alarm Systems 1910.165
- employer shall explain preferred means of reporting emergencies
- ___ Powered Industrial Trucks (patient lifts) 1910.178(l)
- employer shall ensure that each operator is competent
- ___ Laundry Machinery and Operations 1910.264(d)
- employees shall be properly instructed as to the hazards of their work and be instructed in safe practices, by bulletins, printed rules and verbal instructions.
- ___ Access to Employee Exposure and Medical Records 1910.1020(g)
- existence, location, and availability of any records (person responsible for maintaining)
 - employee rights of access to these records
- ___ Bloodborne Pathogens 1910.1030
- accessible copy of the regulatory text of this standard and an explanation of its contents
 - general explanation of the epidemiology and symptoms of Bloodborne diseases
 - explanation of the modes of transmission of Bloodborne pathogens
 - explanation of exposure control plan and how to obtain a copy of the written plan
 - explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials
 - explanation of the use and limitations of methods that will prevent or reduce exposure including appropriate engineering controls, work practices, and PPE
 - information on the types, proper use, location, removal, handling, decontamination and disposal of PPE
 - explanation of the basis for selection of PPE
 - information on the hepatitis B vaccine, including information on its efficacy, safety, 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 persons to contact in an emergency involving blood or other potentially infectious materials

- explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available
 - information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
 - explanation of the signs and labels and/or color coding for biohazard
 - interactive question and answer opportunity with the person conducting the training session
- ___ Ethylene Oxide 1910.1047
- exposure signs and symptoms
- ___ Formaldehyde 1910.1048
- exposure signs and symptoms
- ___ Hazard Communication 1910.1200
- methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area
 - physical and health hazards of the chemicals in the work area
 - measures employees can take to protect themselves from these hazards
 - details of the company's hazard communication program
- ___ Occupational Exposure to Hazardous Chemicals in Laboratories 1910.1450
- contents of this standard and its appendices
 - location and availability of the employer's Chemical Hygiene Plan
 - permissible exposure limits for OSHA regulated substances
 - signs & symptoms associated with exposures in the laboratory
 - location and availability of known reference material on the hazardous chemicals
 - training requirements of hazard communication standard 1910.1200
- ___ Ergonomics (General Duty Clause)
- Muscular-Skeletal Disorder signs and symptoms associated with problem job tasking
 - Muscular-Skeletal Disorder reporting system and management procedure
- ___ Tuberculosis (General Duty Clause)
- information about the disease
 - signs and symptoms of tuberculosis
 - skin test procedure and frequency
 - preventative precautions
 - employee responsibility

5. Walk Through Inspections

In order to further determine if the ASC is in compliance with the OSHA standards, the OSHA compliance officer will conduct a walk through inspection of the facility. This gives the OSHA compliance officer an opportunity to see if the written safety requirements are being followed, which is accomplished by simply observing the work practices of the employees, looking at the physical structure of the facility, observing for administrative practices and asking the employees questions.

Employee Work Practices

- Use of accident prevention measures (such as gait belt)
- Ppe with cleaning products
- Ppe with patients
- Workers observing accident prevention signs and tags
- Usage of biohazard containers
- Using lifting devices

Physical Structure

- Compliance with Life Safety Code
- Slip, trip and fall hazards
- Access to fire fighting equipment & monthly inspections
- Access to medical emergency equipment – eye wash
- General housekeeping - accumulation of combustible material, etc.
- Service ability of tools and equipment, primarily maintenance and ground
- Marking of physical hazards – color code
- Confined spaces identified

Administrative Practices

- Posting of notices – Job Safety and Health (OSHA form 2203)
- Records of inspections
- Availability of MSDS and chemical inventory list

Employees

- Ask them questions
 - ✓ Role in emergency action plan
 - ✓ Familiarization on how to use portable fire extinguisher
 - ✓ Availability of MSDS and how to locate information on it
 - ✓ Procedure for blood saturated clothing
 - ✓ How would you report an unsafe condition

Disclaimer – although every effort has been made to provide an accurate format for OSHA compliance self-inspection, standards are under constant revision and each facility is different and therefore may be subject to OSHA requirements not identified in this OSHA Compliance Check. The employer is responsible for compliance with OSHA standards that are applicable for the facility.