

# OSHA-Required and CDC-Recommended Workplace Training

## OSHA-required Bloodborne Pathogens Training

The OSHA-required bloodborne pathogens (BBP) training<sup>1</sup> of appropriate office staff is to be provided on initial employment at no cost to the staff at a reasonable time and place by a person knowledgeable about the subjects and about the dental office environment and who is available to answer questions about the training. It is to include the following:

- Explanation of the BBP standard and access to a copy
- Explanation of the causes, symptoms, epidemiology, spread, and prevention of bloodborne diseases
- Explanation of the office's written Exposure Control Plan and how to obtain a copy
- How to recognize situations that may create occupational exposures
- Use and limitations of methods of preventing the spread of pathogens
- Types, selection, use, location, removal, handling, and decontamination or disposal of personal protective equipment
- Explanation of what to do if there is an emergency involving injuries or direct exposure to a patient's blood or saliva
- Explanation of what to do if an exposure incident occurs including the methods of reporting the incident and the medical follow-up that will be available
- Information on the post-exposure and medical follow-up
- Explanation of the hepatitis B vaccination, including efficacy, safety, method of administration, benefits and that it is paid for by the employer
- Explanation of the signs, labels and color coding used to identify biohazards

## Active tuberculosis training

The CDC recommends that employees are trained on the signs and symptoms of active tuberculosis and the methods the practice will use to protect employees and patients from exposure.<sup>3</sup>

## OSHA-required ANNUAL Bloodborne Pathogens Training

OSHA also requires annual BBP standard training for all employees within one year of their previous training. The annual or refresher training does not have to be the same as the initial training, but should review the standard and emphasize any new office procedures. Employers also need to provide additional training when changes such as modification of tasks or procedures or institution of new tasks or procedures affect the employee's occupational exposure. The additional training may be limited to addressing any new opportunities created for exposure.

### Some related regulations from OSHA<sup>1</sup>:

- Training of appropriate office staff to prevent exposure to bloodborne pathogens and hazardous chemicals is to be provided on initial employment and at least annually thereafter at no cost to the staff at a reasonable time and place by a person knowledgeable about the subjects and about the dental office environment.
- The Exposure Control Plan shall be reviewed and updated at least annually and whenever necessary to reflect new or modified tasks and procedures that affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

The review and update of such plan shall also:

- reflect changes in technology that eliminate or reduce exposure to bloodborne pathogens;
- document annually consideration and implementation of appropriate commercially available and effective safer medical devices designed to eliminate or minimize occupational exposure;
- ensure employees know how to access the ECP; and
- be reviewed with employees when new or modified tasks are utilized.

## OSHA-required Hazardous Chemicals Training

OSHA's Hazard Communication Standard<sup>4</sup> indicates that employers shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and material safety data sheets.

### Employees shall be informed of:

- The training requirements;
- Any operations in their work area where hazardous chemicals are present;
- The location and availability of the written hazard communication program, including the required list(s) of hazardous chemicals, and material safety data sheets;
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.);
- The physical and health hazards of the chemicals in the work area;
- The measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and,
- The details of the hazard communication program developed by the employer, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information.