



ORTHO2

OSHA Training Requirements

Could your office pass an OSHA inspection tomorrow?

by **Andrea Cook**

Do you have all the training bases covered? As you know, OSHA requires employees to be trained on certain topics annually, and others need to be repeated when a process change occurs. Whether you have one employee or hundreds, as their employer, you are responsible for their safety.

The Occupational Health and Safety Act (OSHA) was established to ensure safe and healthful working conditions by enforcing standards and by providing training, education, and assistance.

Both acts have mandatory training requirements that can often be a source of confusion for dental practices. Are we required to train annually? Who does training apply too? How long should training be? What topics should be covered? If we do not hold training will we be subject to fines?

1. Does OSHA training need to be conducted annually?

Yes, annual OSHA training for all employees is mandatory, and training for new-hire employees must be completed within ten days of hire.

2. To whom does training apply? Should the doctor or dentist also be trained?

OSHA training is mandatory for all employees, including the doctor, assistants, receptionists, and part-time employees.

3. How long should training be?

OSHA doesn't specify a particular length for training. What matters most is the content of the training and that the information is taught effectively.

4. What topics should be covered?

Employers should refer to OSHA's website (www.osha.gov) for specific training requirements of

OSHA standards. OSHA requirements include:

- Annual OSHA Employee Training
- GHS: Global Harmonization System Proof of Training

The following topics must be given to new employees, or if there is a change in the job procedures that introduces a new hazard:

- General Office Safety – including injury and illness prevention program (IIPP), fire safety and emergency responses, eyewash stations, and washrooms
- Hazard Communication
- Ionizing Radiation
- Bloodborne Pathogens – including medical waste management information.

5. Are we required to keep proof of training? If so, what documentation is required?

Yes, OSHA requires training be documented. Records provide evidence of the employer's compliance with OSHA standards. Training records should include:

- Dates of the training
- Content of the training
- Names and qualifications of trainers
- Names and job titles of attendees

Other requirements:

- Employee training records must be maintained for three years.
- Employee training records must be available to employees.
- If the practice is sold, employee records will be

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transferred to the new owner.

6. Can we be fined if we don't conduct training, or fail to hold it annually?

Yes, OSHA failure to train citations can be issued if just one employee missed training. OSHA penalties can range from \$0-\$70,000, depending upon how serious the violation.

OSHA has adjusted the penalty amounts for inflation as of January 2, 2018 to \$12,934 per violation. Hazard communication standard was listed as the #2 most frequently cited violation in 2017.

In addition to the Federal OSHA plans, 26 states, Puerto Rico, and the Virgin Islands have OSHA-approved State Plans.

Maintaining a safe workplace environment is more than just good business practice - it's the law. Contact me to schedule your annual OSHA compliance walk through and training. I am also available for OSHA seminars for your referring offices. ☺

About the Author



Andrea Cook is a clinical consultant and trainer for premier orthodontic offices across the country with more than 20 years experience chairside. She is presenting at the 2019 UGM in Fort Worth, Texas.