VETERINARY OSHA COMPLIANCE CHECKLIST

OSHA®

OSHA Inspection Planning Checklist and Fine Calculator for Veterinary Professionals

This list is provided as a general overview of policies and items needed to be prepared for an OSHA inspection. It must be modified to meet the laws of your state and specific requirements of your company. You also will need to refer to OSHA standards for complete and specific standards that may apply to your particular work situation.

Under OSHA standards and regulations, there are certain documents that an employer is required to make available to OSHA upon request. Failing to produce them could result in separate violations. Examples of these documents include illness and injury logs, a facility's hazard communication program (HAZ/COM) including safety data sheets (SDS), and a lockout/tagout program. Under federal OSHA regulations, OSHA Form 300 and 301 logs must be produced within four hours after they are requested.

Note: The information or documents produced should be limited to the items OSHA is actually requesting. For example, a request for your written Hazard Communication program does not mean producing the HC program *and* training records *and* audits of the program.

The best way to address OSHA inspections is to prepare in advance by considering the issues that may arise, and deciding to the extent possible how they will be addressed. While every inspection is different and relationships with local OSHA Area Offices may influence the approach to an inspection, there are certain issues which may be anticipated. For reference, see the "OSHA Top Ten Violations FY 2017" at the end of this list.

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Compliance Fine Calculator

The following details the "Average Total Cost per Claim by Nature of Injury" from OSHA. The extent to which the employer pays the direct costs depends on the nature of the employer's workers' compensation insurance policy. The employer always pays the indirect costs which amount to about 50% of the "Average Total Cost per Claim by Nature of Injury".

1. **Laceration/Puncture/Wound - $45,931**
2. **Poisoning - Chemical (other than metals) - $57,292**
3. **Puncture - $58,388**
4. **Sprain - $64,002**
5. **Carpal Tunnel - $64,953**
6. **Strain - $67,248**
7. **Respiratory Disorders (gasses, fumes, chemicals, etc.) - $86,127**
8. **Cancer - $343,129**
9. **Multiple Physical Injuries - $164,096**
10. **Multiple Injuries Including Both Physical and Psychological - $257,623**

These injury costs are a significant factor to an employer. We can add two more items to the initial list of compliance costs:

1. Workers Compensation Insurance
2. Productivity Loss (when employee misses work due to an injury)
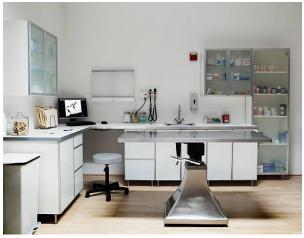
When you do the math, it is clear that even the slightest injury justifies having a OSHA compliance program with (I) written plans, (II) quality training, and (III) expert support, pays for itself many times over. In addition, federal law mandates that every private employer develop and maintain a written safety program that is complete with all the required items.

The following checklist is designed to help veterinary clinics maintain safe work practices, and to ensure clinics are OSHA compliant. Go through the following checklist, totaling the number of items in each section your clinic is achieving. Note what is missing or not being done at your clinic, and work to correct those items. An OSHA inspector might check for any of the following items; work proactively to help prevent costly OSHA fines.

General Veterinary Clinic Safety Requirements

☐ Are food and drink items in designated areas for consumption? Is food and drink prohibited from being consumed where sick or healthy animals are kept? Do all cups have a lid with only a small opening for drinking?

☐ Establish proper animal and material lifting and movement methods.

☐ Provide training on proper animal and material handling techniques for commonly moved items.

☐ Provide animal or material handling equipment necessary to safely move heavy objects. For example, a gurney to move a heavy dog or a hoist to move a horse.

☐ Notify employees that they are expected to ask for help if they require assistance to safely lift or move animals or materials.

☐ Ensure that the dress code incorporates safety considerations based on potential exposures.

☐ Establish a hand washing procedure for your facility, and enforce the hand washing requirements you create. Also, ensure there are hand sanitizer stations available for professionals, as well as clients.

☐ During radiographic procedures, are employees wearing all appropriate PPE? Do your employees know what proper PPE looks like for radiographic procedures? Is lead-lined PPE stored properly to avoid cracking the lead. Are dosimetry badges worn during every procedure?

☐ If applicable to your facility, is ear protection available for employees?

☐ Are there separate waste bins for hazardous and regular waste? Do your employees know what waste is appropriate for each?

☐ Are your air pressure/ oxygen tanks being housed off of direct exposure to the floor?

Employer Postings

- ☐ Display Occupational Safety and Health Administration (OSHA) and state required posters in a prominent location.
- ☐ Post safety signs/warnings where appropriate.
- ☐ Post emergency telephone numbers where they can be readily found in case of emergency. Review your emergency action plan regularly with employees.
- ☐ Are emergency evacuation traffic routes clearly identified?
- ☐ Do you have multiple first aid kits throughout your facility? Are they adequately stocked and regularly maintained?
- ☐ Is a written substance abuse policy in place?
- ☐ Ensure you are familiar with your OSHA 300/301 logs, where they are kept, and make sure to fill them out when required. Is the Summary of Occupational Illnesses posted? (OSHA Form 300 must be posted between Feb. 1 and April 30.)

Medical Services and First Aid

☐ Is there a hospital, clinic, or infirmary for medical care in proximity to your workplace?

☐ If medical and first-aid facilities are not near your workplace, is at least one employee on each shift currently qualified to render first aid?

☐ Have all employees who are expected to respond to medical emergencies as part of their work
  ☐ received first-aid training;
  ☐ had hepatitis B vaccination made available to them;
  ☐ had appropriate training on procedures to protect them from bloodborne pathogens, including universal precautions; and
  ☐ have available and understand how to use appropriate personal protective equipment to protect against exposure to bloodborne diseases?

☐ Where employees have had an exposure incident involving bloodborne pathogens, did you provide an immediate post-exposure medical evaluation and follow-up?

☐ Are medical personnel readily available for advice and consultation on matters of employees' health?

☐ Are emergency phone numbers posted?

☐ Are first-aid kits easily accessible to each work area, with necessary supplies available, periodically inspected and replenished as needed?

☐ Are eye flushing stations available where harmful or corrosive liquids or materials are handled?

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Exit Routes

- ☐ Are all exit routes marked with EXIT signs and illuminated by reliable light sources?
- ☐ Are doors, passageways or stairways, that are neither exits nor access to exits, and which could be mistaken for exits, appropriately marked "NOT AN EXIT," "TO BASEMENT," "STOREROOM" etc.?
- ☐ Is "Exit" sign lettering at least 5 inches high with ½ inch wide stroke?
- ☐ Are exit doors side hinged?
- ☐ Are all exits free from obstructions?
- ☐ Are there sufficient exits to permit prompt emergency escape?
- ☐ Where ramps are used as required exits, is the ramp slope limited to 1 foot vertical and 12 feet horizontal?
- ☐ Are frameless glass doors, glass exit doors, storm doors, etc., fully tempered and do they meet safety requirements for human impact?
- ☐ Do all exit doors open from the inside without the use of a key, tool or any special knowledge?
- ☐ If panic hardware is installed on the exit door, will it allow the door to open with 15 pounds or less force in the direction of the exit traffic?
- ☐ Are exit doors opening onto a street, alley, or vehicle parking areas provided with adequate barriers and warnings to prevent employees stepping into traffic or vehicles blocking the exit?

Safety and Health Training

The most important step to take when planning for the inevitable OSHA inspection is to select a company representative who will be responsible for the company's interests during an OSHA inspection.

- ☐ All job descriptions should include clearly written safety and health responsibilities.
- ☐ Performance evaluations should include a written evaluation of the accomplishment of assigned safety and health responsibilities.
- ☐ Is one person clearly responsible for administering the Safety and Health Program?
- ☐ Is there documentation that all new employees received safety orientation training?
- ☐ Are there records that employees participate in regularly scheduled safety meetings?
- ☐ Are adequate training resources available and management committed to employee training?
- ☐ Is it documented that all employees have received required training
  - ☐ Work area hazards
  - ☐ Emergency action plan
  - ☐ Equipment operation
  - ☐ Personal protective equipment
  - ☐ Location and use of emergency equipment
  - ☐ Hazard communication and Safety Data Sheet (SDS)
  - ☐ Hearing conservation

- ☐ Do all employees receive annual refresher training? How is this documented?
- ☐ Have employees received instruction on procedures to report unsafe conditions, defective equipment, and unsafe acts?

OSHA's Top Violations

OSHA recently released the top ten violations for fiscal year 2017, which ended September 30. Generally, this list does not change much from year to year with the top three violations always being fall protection, hazard communication and scaffolding. OSHA noted that not all violations had been added to its reporting system but that the list was not expected to change.

1. **Fall Protection** (Construction – 29 CFR 1926.501). Total of 6,072 violations with frequently violated requirements including failure to provide fall protection for unprotected edges and open sides in residential construction and failure to provide fall protection on low-slope roofs.
2. **Hazard Communication** (29 CFR 1910.1200) Total of 4,176 violations with frequently violated requirements for failure to have a written hazard communication program and failure to provide employee access to safety data sheets.
3. **Scaffolding** (29 CFR 1926.451) Total of 3,288 violations with the most frequent violations including improper access to surfaces and lack of guardrails.
4. **Respiratory Protection** (29 CFR 1910.134) Total of 3,097 violations with the most frequent violations for failure to establish a written respiratory protection program and failure to provide medical evaluations.
5. **Lockout/Tagout** (29 CFR 1910.147) Total of 2,877 violations with the most frequent violations for employee training and failure to conduct periodic inspections.
6. **Ladders** (Construction – 29 CFR 1926.1053) Total of 2,241 violations with frequent violations including improper use of ladders, damaged ladders, and using the top step.
7. **Powered Industrial Trucks** (29 CFR 1910.178) Total of 2,162 violations including employee training and refresher training.
8. **Machine Guarding** (29 CFR 1910.212) Total of 1,933 violations with the most frequent for failure to guard points of operation.
9. **Fall Protection—Training** (Construction – 29 CFR 1926.503) Total of 1,523 violations with the most frequent for failure to train employees in identifying fall hazards and proper use of fall protection equipment.
10. **Electrical** (29 CFR 1910.305) Total of 1,405 violations including temporary wiring in lieu of permanent wiring.

Please Note

Note: This General Industry Self-Inspection Checklist is not designed to supersede existing safety inspection checklists, building codes, local or OSHA standards. It should be used only as a general guideline. You are encouraged to customize this general guideline to amend your specific accident prevention plan.

If there is a safety rule, policy, or procedure checklist appropriate for your work or work environment which has not been included above, then a new checklist for that safety rule, policy, or procedure should be added to improve your documentation. Likewise, if specific checklist items in this document do not apply because the equipment or work operation described is not used, then that specific item should be crossed out or deleted. If accidents occur, new safety rules should be developed and incorporated to prevent their recurrence.

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