

DEVELOPING YOUR



EMERGENCY ACTION PLAN

CREATE OR UPDATE YOUR PLAN FOR PUBLIC HEALTH EMERGENCIES



OSHA Standards Applicable to Medical Offices

OSHA

's role is to assure the safety and health of America's workers by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. As part of the Department of Labor, OSHA and the states that operate OSHA-approved state plans establish guidelines and standards to promote worker safety and health that apply to every workplace in the United States, including medical and dental offices.

This brochure provides only a glimpse of the most frequently found hazards in medical and dental offices. Many other standards may apply. This information should not be used as a substitute for reading and becoming familiar with all applicable OSHA standards. As an employer, it is up to you to follow up and obtain the full text of the OSHA standards, all of which are available on the OSHA website at www.osha.gov or by calling our toll-free number (800) 321-OSHA(6742). Most OSHA materials are available at no charge.

The following requirements include those that normally apply to medical and dental offices, whether there are two or 200 employees. Additional OSHA standards may apply to some offices. The complete text of the regulations can be found in Title 29 of the Code of Federal Regulations (29 CFR).

Bloodborne Pathogens Standard (29 CFR 1910.1030)

This is the most frequently requested and referenced OSHA standard affecting medical and dental offices. Some basic requirements of the OSHA Bloodborne Pathogens standard include:

- A written exposure control plan, to be updated annually.
- Use of universal precautions.
- Consideration, implementation and use of safer engineered needles and sharps.

- Use of engineering and work practice controls and appropriate personal protective equipment (gloves, face and eye protection, gowns).
- Hepatitis B vaccine provided to exposed employees at no cost.
- Medical follow-up in the event of an "exposure incident".
- Use of labels or color-coding for items such as sharps disposal boxes and containers for regulated waste, contaminated laundry and certain specimens.
- Employee training.
- Proper containment of all regulated waste.

Hazard Communication Standard (29 CFR 1910.1200)

The hazard communication standard is sometimes called the "employee right-to-know" standard. It requires employee access to hazard information. The basic requirements include:

- A written hazard communication program.
- A list of hazardous chemicals (such as alcohol, disinfectants, anesthetic agents, sterilants and mercury) used or stored in the office.
- A copy of the Material Safety Data Sheet (MSDS) for each chemical (obtained from the manufacturer) used or stored in the office.
- Employee training.

Ionizing Radiation Standard (29 CFR 1910.1096)

This standard applies to facilities that have an x-ray machine and requires the following:

- A survey of the types of radiation used in the facility, including x-rays.
- Restricted areas to limit employee exposures.
- Employees working in restricted areas must wear personal radiation monitors such as film badges or pocket dosimeters.
- Rooms and equipment may need to be labeled and equipped with caution signs.

Exit Routes Standards (29 CFR Subpart E 1910.35, 1910.36, 1910.37, 1910.38 and 1910.39)

These standards include the requirements for providing safe and accessible building exits in case of fire or other emergency. It is important to become familiar with the full text of these standards because they provide details about signage and other issues. OSHA consultation services can help, or your insurance company or local fire/police service may be able to assist you. The basic responsibilities include:

- Exit routes sufficient for the number of employees in any occupied space.
- A diagram of evacuation routes posted in a visible location.

Electrical Standards (Subpart S - Electrical 29 CFR 1910.301 to 1910.399)

These standards address electrical safety requirements to safeguard employees. OSHA electrical standards apply to electrical equipment and wiring in hazardous locations. If you use flammable gases, you may need special wiring and equipment installation. In addition to reading the full text of the OSHA standard, you should check with your insurance company or local fire department, or request an OSHA consultation for help.

OSHA Poster

Every workplace must display the OSHA poster (OSHA Publication 3165), or the state plan equivalent. The poster explains worker rights to a safe workplace and how to file a complaint. The poster must be placed where employees will see it. You can download a copy or order one free copy from OSHA's website at www.osha.gov or by calling (800) 321-OSHA.

References Emergency
Action & Fire
Prevention Plan

Standard: Emergency Action Plan

By Standard Number / 1910.38 - Emergency action plans.

- **Part Number:** 1910
- **Part Number Title:** Occupational Safety and Health Standards
- **Subpart:** 1910 Subpart E
- **Subpart Title:** Exit Routes and Emergency Planning
- **Standard Number:** 1910.38
- **Title:** Emergency action plans.
- **GPO Source:** e-CFR

1910.38(a)

Application. An employer must have an emergency action plan whenever an OSHA standard in this part requires one. The requirements in this section apply to each such emergency action plan.

1910.38(b)

Written and oral emergency action plans. An emergency action plan must be in writing, kept in the workplace, and available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees.

Standard: Fire Prevention Plan

By Standard Number / 1910.39 - Fire prevention plans.

- Part Number: 1910
- Part Number Title: Occupational Safety and Health Standards
- Subpart: 1910 Subpart E
- Subpart Title: Exit Routes and Emergency Planning
- Standard Number: 1910.39
- Title: Fire prevention plans.
- GPO Source: e-CFR

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Application. An employer must have a fire prevention plan when an OSHA standard in this part requires one. The requirements in this section apply to each such fire prevention plan.

1910.39(b)

Written and oral fire prevention plans. A fire prevention plan must be in writing, be kept in the workplace, and be made available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees.

Guidance: Pandemic/Public Health Emergency



UNITED STATES
DEPARTMENT OF LABOR



Occupational Safety and Health Administration

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Healthcare Workers and Employers

COVID-19 Control and Prevention ▾

Given the evolving nature of the pandemic, OSHA is in the process of reviewing and updating this document. These materials may no longer represent current OSHA recommendations and guidance. For the most up-to-date information, consult **Protecting Workers Guidance**.

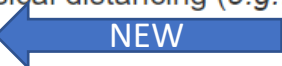
This guidance is not a standard or regulation, and it creates no new legal obligations. It contains recommendations as well as descriptions of mandatory safety and health standards. The recommendations are advisory in nature, informational in content, and are intended to assist employers in providing a safe and healthful workplace. The Occupational Safety and Health Act requires employers to comply with safety and health standards and regulations promulgated by OSHA or by a state with an OSHA-approved state plan. In addition, the Act's General Duty Clause, Section 5(a)(1), requires employers to provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm.

<https://www.osha.gov/coronavirus/control-prevention/healthcare-workers>

Enforcement: Pandemic/Public Health Emergency

Enforcement Instructions Effective 3/12/2021:

<https://www.osha.gov/memos/2021-03-12/updated-interim-enforcement-response-plan-coronavirus-disease-2019-covid-19>

- *Program and Document Review.* Prior to conducting a walkaround inspection, CSHOs shall take the following steps as appropriate to the facility:
 - Determine whether the employer has a written safety and health plan that includes contingency planning for emergencies and natural disasters, such as the current pandemic. This is particularly important for large facilities, business operations, and institutions. For example, in healthcare, government, and schools, a pandemic plan should be established, as recommended by the CDC.[4] If this plan is a part of another emergency preparedness plan, the review does not need to be expanded to the entire emergency preparedness plan (*i.e.*, a limited review addressing issues related to exposure to the COVID-19 virus would be adequate). The evaluation of an employer's pandemic plan may be based upon other written programs, and in hospitals, a review of the infection control plan.[5]
 - Review the facility's procedures for hazard assessment and protocols for PPE use.
 - Determine whether the employer has implemented measures to facilitate physical distancing (*e.g.*, barriers or administrative measures to encourage 6-foot distancing) and to ensure the use of face coverings by employees, customers and the public. 
 - Review relevant information, such as medical records related to worker exposure incident(s), OSHA-required recordkeeping, and any other pertinent information or documentation deemed appropriate by the CSHO. This includes determining whether any employees have contracted COVID-19, have been hospitalized as a result of COVID-19, or have been placed on precautionary removal/isolation.

Cross References CDC Recommendations updated 2/10/2021:

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-recommendations.html>

Links to 3/21/2021 Updates:

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-after-vaccination.html>

Medical Practices – Now What?

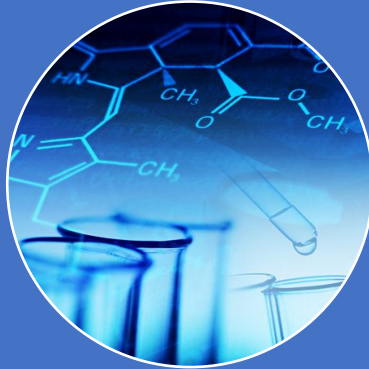
Fire Prevention and Emergency Action Plan to Include:

- Fire Prevention
- Electrical Safety
- Exit Routes
- Pandemic/Public Health Emergency
- Other Likely Emergencies based on Hazards

Fire Prevention



Storing of
Flammable
Materials



Reactive
Chemicals



Clutter and
Stored
Material



Prohibit
Smoking



Maintenance
of Fire
Extinguishers
and Smoke
Detectors



Electrical Standards



Space
Heaters



Extension
Cords



Maintain
Equipment



Exit Routes



Lighted Exit
Signs



All Doors
Labeled



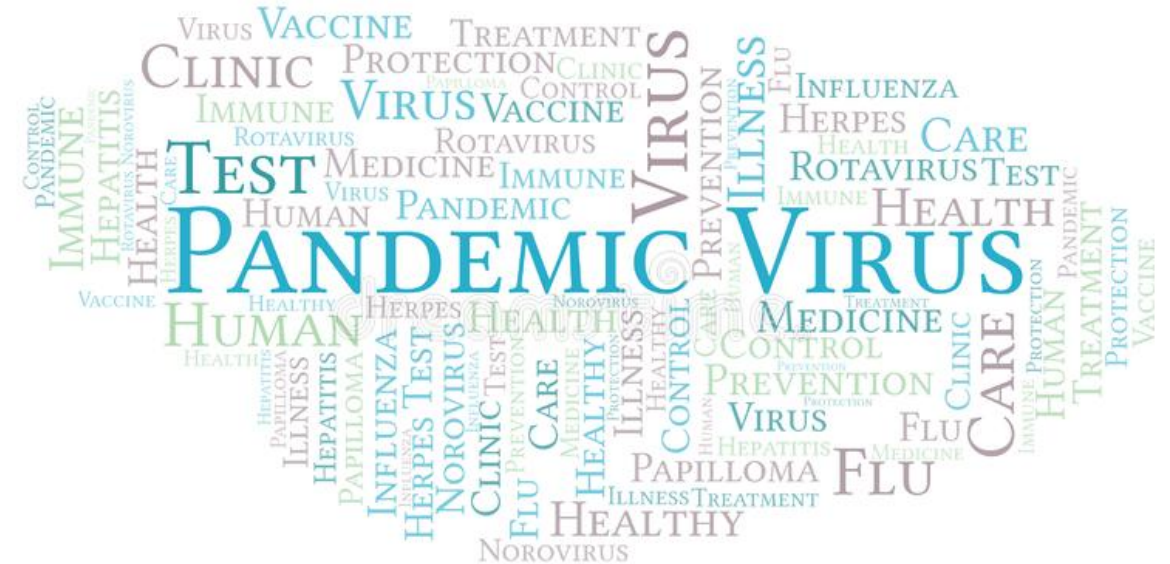
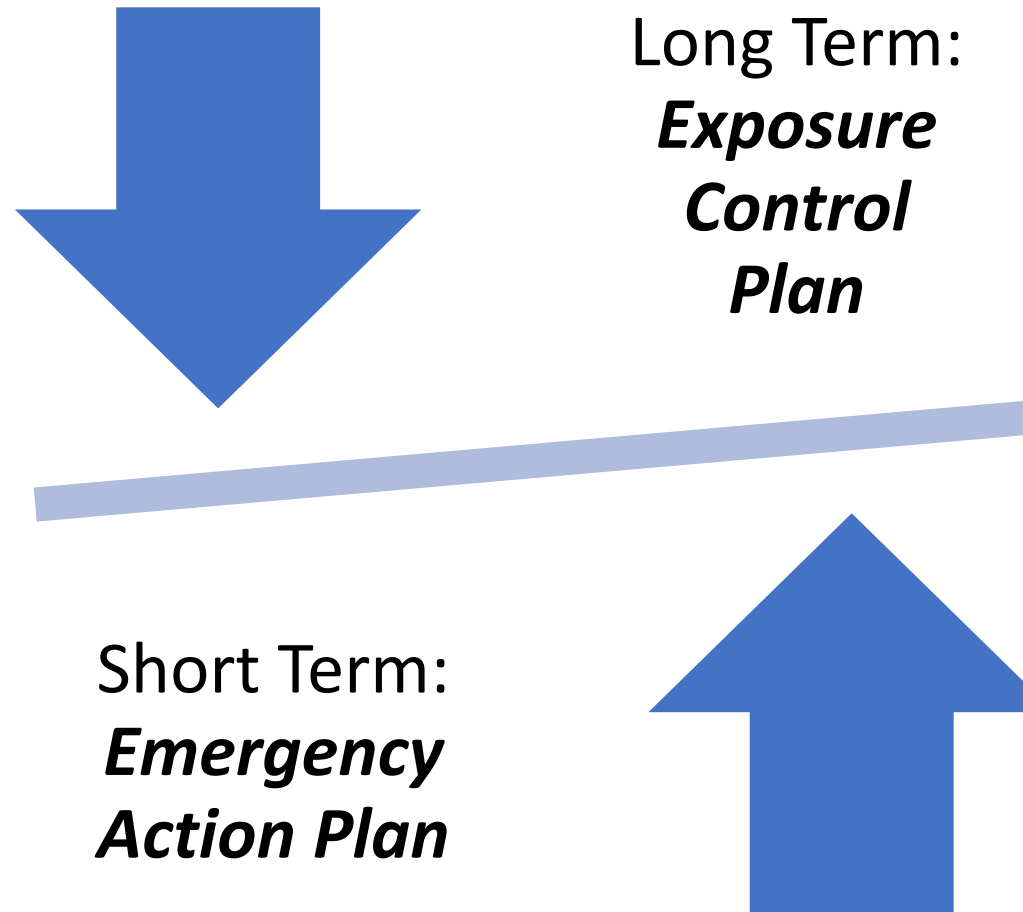
Exit Doors
Unlocked
During
Business Hours



Exit Route
Maps



Pandemic Emergency



Other Emergencies



Accounting Procedures

- Accounting for Employees
- Accounting for Patients



Meeting Spot

- Evacuation
- Shelter in Place



Alerts and Alarms

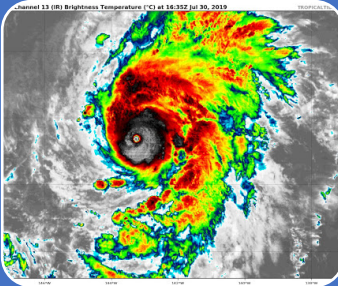
- Assignments
- Types of Alerts

Emergencies Requiring Evacuation or Shelter in Place



Fire

- Fire Extinguishers
- Fire Alarms



Severe Weather

- Hurricane
- Flood
- Tornado/Other



Workplace Violence

- Active Shooter
- Civil Disturbance
- Bomb Threat

Training, Drills and Inspections



Keep Documentation

Continuous Improvement: PDCA

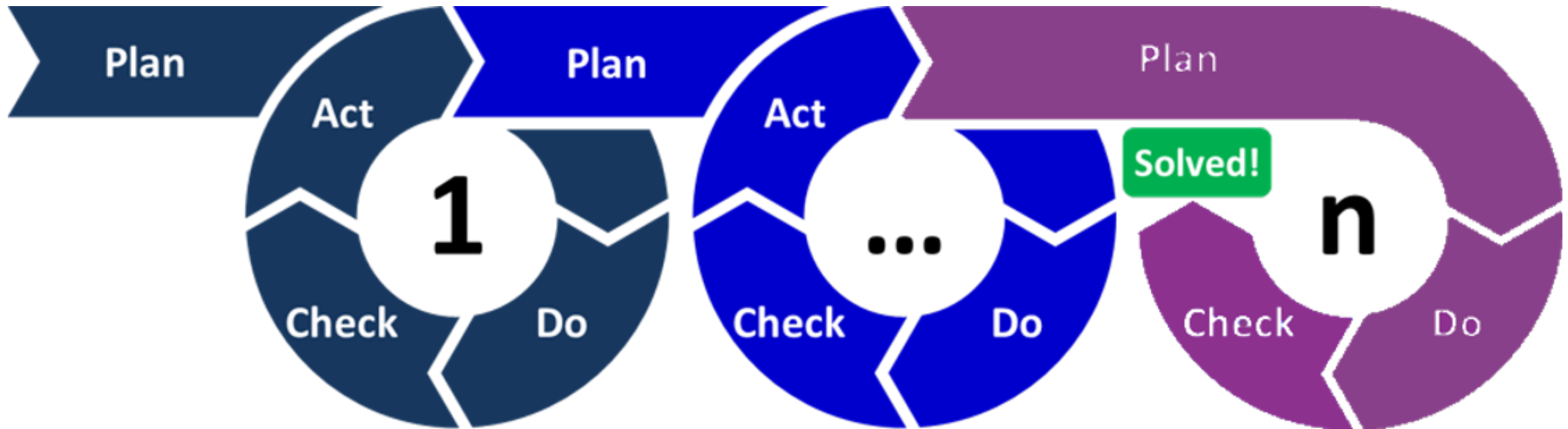


Photo credit: Christoph Roser at [AllAboutLean.com](https://www.allaboutlean.com)