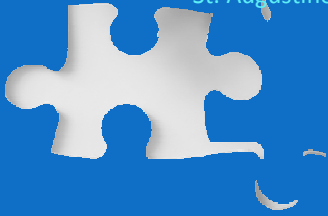


OSHA Inspections: Real Life Story

Stephanie Martin, BSN, RN, CNOR, CASC

Administrator

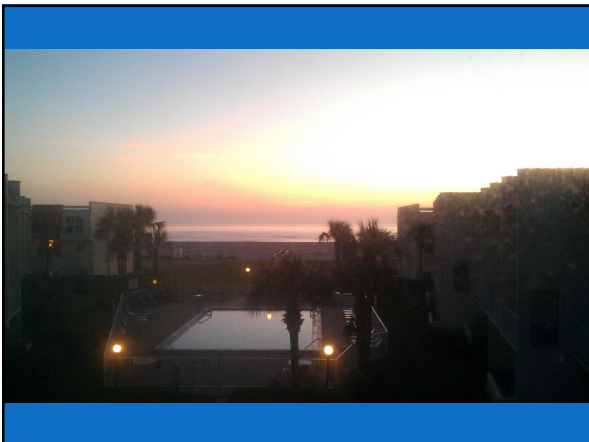
St. Augustine Surgery Center





August 14, 2012, 6:00 AM

The day started like any other . . .



Arriving at the center



Morning Rounds . . .



A usual day . . .

- Answer voice mail messages
- Respond to email
- Finish QAPI reports for meeting
- Assist patient that can't pay at the window
- Finalize agenda for leadership meeting
- Call physician's office about cryo gas shortage
- Review aging accounts
- Call new physician and set up a time for a tour of the facility
- Review and approve invoices for payment
- Develop protocol for drug shortage
- Finish tally of PONV study
- Lunch with physician office staff to review scheduling concerns
- Review credentialing files for Board meeting
- Follow up with housekeeping company regarding issues
- Call vendor for repair of broken hand piece
- Begin AAAHC survey application to renew accreditation
- Prepare physician block time utilization report
- Review case costing and create a summary for board meeting
- Follow up with physician regarding anesthesia issue
- Call IT to fix network access for physician laptop
- Quality measures audit program for new G-code submission
- Reassess insurance payments for new procedure

10 AM



Immediate Reaction

- Quick walk through building
- Find Clinical Coordinator, Safety Officer & Business Office Manager
- Let OR know, including Anesthesia
- Headed back to waiting area
- *Do not keep inspector waiting long*
- Greeted Inspector (Don't forget to smile)
- Bring back to office
- Exchanged business cards – was warned about imposters
- Requested documents (the list was long)
- Made a schedule of the visit

Documents Requested

- Safety Plan
- Safety Training
- Annual Sharps Inventory
- Safety Device Evaluations
- Safety Documentation
- Safety Meeting Minutes
- Injury log / OSHA 300 form*
- Safety Policies
- Name of Safety Officer
- All Safety Checks – generator, equipment, etc.
- Exposure Plan
- Safety Officer Training
- Bloodborne Pathogen Training

OSHA Unannounced Surveys

- 2012 funds allocated to inspect surgery centers in 4 southern states
- Purpose was to ensure employee protection from sharps injuries
- Inspectors focus on areas where sharps may be used

Schedule

- Survey was unannounced
- Surveyor arrived at 10 AM
- *Conflict*
- Physician office meeting at 12 PM
- Surveyor said, "No problem; I will take lunch at that time."
- *Little did we know . . .*

Next

- Document review in Administrator's office
- Time for lunch . . .
- *How long can I make this last . . .*
- Meeting lasted longer than expected
- Reviewing documents when I returned

Tour Facility

- Time for the Clinical Coordinator to have some fun
- OR first!
- Sterile supply room – where are sharps safety supplies?
 - Photographed safety sharps in use
 - Must be easily accessible and enough inventory for use
- Visited Decontamination Room and watched how dirty instruments were transported

Keep the tour going . . .

- Housekeeping closet
 - Properly labeled products
- Scrub sinks – PPE available?
- MORE PICTURES!
- Gloves and alcohol in frequent intervals
 - But not too much!

The tour continues . . .

- Equipment Room next
 - Equipment stickers
 - cord integrity
- MSDS book
 - The day our staff was updating it
- Eye wash stations
- Needless IV tubing
- Safety angiocatheters
- Retractable lancets for Hemocue

Personal Protective Equipment (PPE)

- Properly selected and appropriate for the job
- Provided and required*
- No cost to employee
- PPE assessment
- Employee training



3 PM

- Inspector prepares to leave AND tells us he will return tomorrow
- Tomorrow: More documentation regarding sharps evaluations
- Staff interviews to be conducted
 - 3 staff members selected by him (by job title)
 - In private (very important)
 - 15 minutes each



Additional Documentation

- Requested documentation of evaluation of safety devices
- Documentation of safety recommendations by staff*
- We stayed calm, cool and collected, then

We went to work!

Following Day

- Produced additional documentation
- Presented to surveyor
- Discussed staff for interviews and provided a place for *privacy*

Interviews

- First 15 minute interview was 20 min
- Second interview – almost an hour!
 - Start search for OSHA fines
https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_tab=OSHA&p_id=3371
- Third interview 15 min



Exit Conference

- Drum roll please . . .
- Usual formalities
 - Unfair treatment by surveyor
 - Where to report
 - OSHA booklet
 - Fines*







Effective Completion Date	Requirement(s)	Who
December 1, 2013	Train employees on the new label elements and SDS format.	Employers
June 1, 2015*	Comply with all modified provisions of this final rule, except:	Chemical manufacturers, importers, distributors and employers
December 1, 2015	Distributors may ship products labeled by manufacturers under the old system until December 1, 2015.	
June 1, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.	Employers
Transition Period	Comply with either 29 CFR 1910.1200 (this final standard), or the current standard, or both.	All chemical manufacturers, importers, distributors and employers

* This date coincides with the European Union implementation date for classification of mixtures
<https://www.osha.gov/dsp/hazcom/HCSFactsheet.html>
