

M.D. NEWS

compliance issues



Compliance with OSHA Bloodborne Pathogen Standard 1910.1030

A Closer Look — Part 1 of 3

By Paul Capuano

This series of articles is designed to assist today's health care providers in better understanding the specifics of OSHA Standard 1910.1030. Part 1 focuses on the employer's responsibility to **provide, manage and maintain all personal protective equipment (PPE)**.

1910.1030(d)(3)(i) Provision. When there is occupational exposure, the employer shall provide, at no cost to the employee, appropriate personal protective equipment ...

The primary reason that employers struggle with this responsibility is that if they

1910.1030(d)(3)(v) Repair and Replacement. The employer shall repair or replace personal protective equipment as needed to maintain its effectiveness, at no cost to the employee.

While inventory management, sizing and repairs are not the typical responsibilities of today's health care employers, according to the 1910.1030 Accessibility and Repair and Replacement clauses, they should be. Beyond providing PPE, it is also the employer's responsibility to make sure the appropriate inventory is available, sized accordingly and maintained appropriately. Employers struggle with accessibility and repair and replacement for the same reason they struggle with provision: cost. Carrying the right amount of inventory, accommodating sizing needs and replacing worn products is expensive and time consuming.

Textile service offers solutions to these and other inventory management issues. Textile service will manage inventory levels

decide to provide PPE themselves (and do it the right way) they will have to purchase a wide array of expensive products. Based on the varying levels of exposure, employer PPE purchases can include scrubs, clinical jackets or fluid resistant gowns and lab coats, just to mention a few. While the need to provide an extensive PPE product line is evident, many employers fall short on the Provision responsibility because of the significant costs involved. This dynamic places their staff and their practices at risk.

There is good news. Employers can avoid the huge up-front costs associated with pro-

viding PPE by utilizing a textile service. A textile service will assume all of the up-front costs associated with PPE provision and can offer an appropriate and extensive product line to support different levels of exposure. In short, with a textile service, the employer can fulfill the provision responsibility in a cost-effective manner.

1910.1030(d)(3)(iii) Accessibility. The employer shall ensure that appropriate personal protective equipment in the appropriate sizes is readily accessible at the work site or is issued to employees ...

While inventory management, sizing and repairs are not the typical responsibilities of today's health care employers, according to the 1910.1030 Accessibility and Repair and Replacement clauses, they should be.

to accommodate business needs and offer size or product adjustments, as needed. The service will also maintain your products by repairing or replacing as necessary. Inventory management and product maintenance are the foundation of a textile service program.

SUMMARY

Understanding the compliance elements of OSHA Standard 1910.1030 can be challenging for most employers. Once understood, employers that try to assume the requisite responsibilities themselves will often find this initiative expensive and time consuming. The provision, management and maintenance of PPE alone can create significant costs.

A cost-effective approach to managing these important responsibilities is to utilize a textile rental service. In Part 1 we discussed how a textile service can cost-effectively assist in the administration of PPE provision, management and maintenance. In Parts 2 and 3, we will look into other areas of 1910.1030 compliance and how it affects today's health care providers.

As Nixon's corporate sales director, Paul Capuano has over 15 years of experience in supporting compliance initiatives via textile service. He can be reached via e-mail at capuano@nixonmedical.com. For more information, please visit www.nixonmedical.com. ■