

Eli's Rehab Report

Compliance: 3 OSHA Safeguards That Most Outpatient Rehab Clinics Overlook

Owning an OSHA guidebook doesn't mean you're in OSHA compliance.

Is your binder of OSHA guidelines collecting dust? Do you even have a binder of OSHA guidelines in your clinic? In the event that an accident or injury occurs, you don't want to get slammed with OSHA fines -- or in the worst-case scenario, a lawsuit. Make sure you're up to speed in the following safety areas, or risk paying for it later.

1. Personal Protective Equipment

You may not think you need an impervious gown on hand, but you'd be surprised. The maintenance of personal protective equipment (PPE) is an area that is typically deficient in rehab settings, says **Mary Daulong, PT, CHC**, with Business & Clinical Management Services Inc. in Spring, Texas. This means having basic protection such as gloves, eye shields and impervious gowns readily available. At a minimum, you should have gloves available in each major treatment area. Things such as gowns and eyewear could be stored in a supply closet, depending on your facility's need.

Don't miss: Although not PPE per se, you should also have spill kits on hand so that in the event of a hazardous chemical or a biohazard spill, employers could safely clean the spill. This is another OSHA compliance area that is often not comprehensive in rehab settings, Daulong says.

2. Bloodborne Pathogen Exposure Control Plan

If you think bloodborne pathogen standards don't apply to you if your clinic doesn't do open wound care, think again. Suppose someone getting ready for aquatic therapy slips and falls at the poolside, or suppose a patient who is gait training falls and hits her head on a corner. Either of these situations could result in an open wound, and your employees must know how to protect themselves.

Solution: "OSHA requires you to have a copy of the bloodborne pathogen standards in your clinic, as well as an exposure control plan," Daulong says. An exposure control plan is a set of policies and processes you've tailored for your clinic, based on the bloodborne pathogen standards. Part of your plan should include having spill kits and personal protective equipment, such as gloves, readily available.

But there's more to bloodborne pathogen compliance than just having the tools to deal with accidents; you're required to take preventive measures, too. "One big area of deficiency is educating employees on hepatitis B," Daulong points out. You're required to educate employees with potential exposure to hepatitis B on the dangers of the disease, and to offer them the vaccination series free of charge.

The kicker: You cannot bill the vaccine to insurance -- and if the person doesn't respond to the vaccine, you're required to offer the series again, Daulong says.

But you don't have to worry about getting every employee vaccinated. You're responsible for educating and giving the option for a vaccination series, but you can't require the employee to get inoculated, Daulong clarifies.

3. Hazard Communication

If you're already in compliance with the bloodborne pathogen standards, don't stop there. One area therapists take for

granted is safely handling hazardous materials. "You are required to orient employees who handle any hazardous products prior to using them," Daulong says.

But don't be so sure you're off the hook just because your facility doesn't have a pool and handles heavy pool chemicals. "We often don't think about a disinfectant being hazardous, but it is -- especially since therapists may have contact with this chemical multiple times per day," Daulong says.

What to do: Make sure labels on all hazardous products clearly state what the chemical is and any PPE you may need for handling. Some pool chemicals, for example, require a respirator. Also, be sure that each chemical has a current Material Safety Data Sheet, or MSDS, available. "Sometimes clinicians are particularly lax about labeling when they transfer something like a disinfectant to smaller containers for the treatment tables," Daulong points out. "Make sure they are also properly labeled to comply with OSHA.

Overwhelmed yet? "I tell my PT offices to focus their efforts on the standards that apply to them directly but also to be aware of what else is out there," says **Raffi Semerdjian**, provider services representative for PTPN, an independent rehab provider network in Calabasas, Calif. "However, there are some OSHA rules that are universal across the board, no matter what type of healthcare setting it is."

Note: Check out the next issue of Physical Medicine & Rehab Coding Alert to explore lifting and transferring patients as an occupational hazard -- and how OSHA is getting involved.