OSHA Tips for Veterinary Practices

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Similar to other workplaces in the United States, veterinary facilities are subject to inspections by the Occupational Safety and Health Administration (OSHA) and OSHA's applicable regulations. However, some veterinary practices are not familiar with certain OSHA requirements that are veterinary specific and which could result in fines of up to $7,000 per incident for violation of those requirements.

As such, understanding OSHA requirements and ensuring that your practice is OSHA compliant is of significant importance. Compliance with OSHA requirements can lessen the likelihood of worker's compensation or unsafe workplace claims in a veterinary practice.

OSHA inspectors have the right to conduct unscheduled inspections of workplaces. One potential violation that inspectors commonly find at veterinary practices is insufficient labeling of secondary containers. If your practice transfers chemicals from the original containers in which they were shipped to a secondary container such as a spray bottle, those secondary containers must be properly labeled. Within the last three months, we have worked with a client that received a citation and fine for this very failure.

Veterinary facilities are also required to maintain a "Hospital Safety Manual" that includes specific information regarding safety hazards and abatement plans. The manual must include abatement plans for blood borne pathogens, chemical hazards, fire prevention, sharps injury, violence prevention, medical waste disposal, hazardous waste, emergency action and hepatitis B.

Additionally, employees at veterinary practices must be trained in how to access the clinic's Material Safety Data Sheets, which are required to be present at the workplace and easily accessible to all employees. Ensuring that employees are protected from the effects of exposure to radiation through x-rays falls within OSHA's jurisdiction.

Veterinary practices are susceptible to other common OSHA violations such as failure to have a properly completed Hazard Communication Plan dealing with chemicals at the workplace, failure to complete a personal protective equipment assessment for each employee, failure to provide such appropriate personal protective equipment, lack of a written fire and emergency plan that complies with OSHA requirements, proper employee training documentation, and lack of systems to prevent waste and aesthetic gases from accumulating in the workplace. If you and your staff are not familiar with OSHA requirements for veterinarians, there are several recommendations that require immediate attention.

First, attend an OSHA course or seminar specifically geared toward veterinary practices to understand the substantive requirements for your practice in regard to OSHA compliance. Second, understand the citation process involved with OSHA inspections – specifically the process for issuance of citations, fines and abatements, and the appeal process of any citations. Third, if your practice is subject to a surprise inspection, immediately contact your legal counsel to discuss your response to ensure that you understand your clinic's rights and the practical aspects for dealing with the OSHA field inspectors.

Finally, conducting a self-inspection to develop a list of items to be addressed and changed would be quite helpful in demonstrating the practice's good intent and progress toward OSHA compliance. Even if your practice has not completed implementing the entire list of changes at the time of an unannounced OSHA inspection, having conducted a self inspection and developed a list that begins to address and identify safety-related changes would be quite helpful and likely result in a lower fine and lesser degree violation by OSHA.

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