Oregon OSHA Adopts GHS Standard

Last spring, we reported in our newsletter that the federal government had adopted a revised Hazard Communication standard known as the Globally Harmonized System for the Classification and Labeling of Chemicals (GHS). Oregon OSHA recently announced that it would adopt the federal changes and use the same phased-in transition period for compliance. As a state-administered OSHA plan, OR-OSHA had six months to decide whether to adopt the federal changes or develop its own version.

Chemical manufacturers will be required to implement all GHS changes by June 1, 2015. Your practice is required to implement all GHS changes by June 1, 2016.

Adoption of the GHS standard requires four major changes to Oregon’s Hazard Communication (HazCom) rules:

1. Chemical manufacturers and distributors now must follow a prescribed method for classifying the health and physical hazards of chemicals, based on available data.

2. While the requirement to properly label chemicals will not change, the content of the labels must now include:
   a. Product identification and hazardous ingredients
   b. Supplier information: name, address and phone number
   c. Pictogram symbols used to convey health, physical and environmental hazard information
   d. Signal words and hazard statements to identify the severity level of the hazard
   e. Precautionary statements to prevent adverse effects from exposure, improper storage or handling of hazardous chemicals

3. Standardization of Safety Data Sheets (SDS), formerly called Material Safety Data Sheets (MSDS). A 16-section format with specific information assigned to each section is now mandatory.

4. Employers must train all employees in the use of the new labels and Safety Data Sheets by December 1, 2013.

In July, our staff trainers began incorporating information on the GHS standard into our annual OSHA training at your practice. By Dec. 1, 2013, all healthcare staff in the practices we work with will have been trained in the new HazCom system. The new GHS standard is also an excellent topic for staff Safety Committee meetings in the coming year.
How’s Your HIPAA-Readiness?

If a HIPAA auditor arrived at your practice today, would you be prepared for a full audit? The HI-TECH Act mandates increased enforcement of the HIPAA Privacy & Security Rules, as well as a protocol for on-site audits. A consulting firm, KPMG, has been hired by the government to conduct on-site HIPAA audits and the results of these audits are being posted on the Internet.

Healthcare Compliance Associates can help! We’ve contracted with Sean Lee, an Oregon-based HIPAA consultant, to offer our practices the help they need to become fully HIPAA-compliant. For a very reasonable fee, Sean will help you fulfill your legal requirement to conduct regular evaluations in order to assess your compliance with HIPAA and provide a written report.

If the assessment finds gaps in your HIPAA compliance, Sean can assist your Privacy and Security Officers in finding solutions. Typical areas of concern include: risk analysis, updating HIPAA security plans and policies, developing business continuity plans for disasters, and updating procedures for breach investigations.

Want to learn more? Call us at 541-345-3875 and we will put you on the path to HIPAA-readiness.

Electronic Newsletter

As the costs associated with snail-mail delivery of our newsletter continue to rise, we have been forced to consider new delivery options. Most practices will now receive our newsletter in a pdf attached to an e-mail. The most recent newsletter, as well as archived newsletters, will also be available for downloading from our website, www.hlthcarecomp.com.

If your practice requires a printed version of the newsletter for your staff, the electronic files will produce a high-quality product on most printers in office use. If you do not use e-mail or prefer to receive a printed copy, please call us at 541-345-3875. We will be contacting all our clients to verify and update your e-mail address for our records.

OSHA Citations

**Single most expensive OSHA Bloodborne Pathogen violation in doctors’ offices and clinics:**

1910.1030(d)(1) Bloodborne pathogen rule: Universal Precautions not observed.

Average initial fine: $1,500

**Single most expensive OSHA violation for dental offices:**

1910.1030(c)(1)(iv)(A) Bloodborne pathogen rule: Exposure Control Plan updates do not reflect changes in technology to eliminate or reduce exposure to bloodborne pathogens.

Average initial fine: $2,500

*Source: Medical Environment Update newsletter*

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**Oh Boy!**

The following poem came to us from a staff member at a dental clinic in Coos Bay:

Oh Boy! A meeting on my day off with HIPAA
Something I’m quite sure I’d rather SKIPPA
But I will suck it up deep
For, I’ve a job I wanna keep
And I’ll try hard my lips to ZIPPA!