

OSHA SCENARIOS

1. Your Nurse Injector has an appointment with a woman in her late 40s to fill her smile lines. Upon seeing the patient, the nurse realizes that the woman is her high school classmate whom she has not seen in years. The two women start talking and the nurse forgets to put on her gloves while injecting the filler. Is that an OSHA violation?

Yes, since gloves need to always be worn upon injecting fillers, drawing blood, etc. If a complaint were to be filed with an OSHA regional office, the practice would be fined for the failure to use personal protective equipment. The employer is required to provide personal protective equipment to its employees, have policies regarding personal protective equipment, train employees how/when to use it, and discipline employees if they fail to use it.

2. During an audit, an OSHA representative asks to see the medication cabinet and goes through each medication on the shelf! He finds one, out of hundreds, that is expired. You say someone overlooked it and it shouldn't be reported as an OSHA violation. Are you correct?

Expired medications do not count as an OSHA violation as OSHA is concerned with the employer's responsibility to keep its employee safe from recognizable hazards. However, make sure you have a dedicated employee who monitors medications each month and keeps a log of what you have and when it will expire. Also, remember to always lock your cabinet with the drugs so unauthorized individuals cannot access it.

3. You are in the middle of injecting Kybella, and a patient calls about post-procedure bruising and swelling. Your Office Manager knocks on the door and asks you to speak to this nervous patient. You put the needle on the table and leave to take the call. You return to continue the procedure using that same needle. Is this acceptable?

Yes, although do not make that your practice. Here, the concern would be a possible needle stick, exposure to contaminated blood, etc. on the part of the employee. The employer is required to provide protective personal equipment, train on needle sticks, and proper disposal of hazardous materials, and discipline employees if they fail to follow the rules.

4. A retired police officer comes to your office and notices that your fire extinguisher has not been serviced for over 2 years and tells you to get that done ASAP. Does this constitute an OSHA violation?

Yes, since OSHA is concerned about the safety of the employees. Although fire extinguishers don't have to be replaced annually, they must be serviced by the fire marshal on a yearly basis.