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Mock OSHA Audits

OSHA has long term care facilities in their crosshairs! In April 2012, OSHA announced a new National Emphasis Program (NEP) that clearly states OSHA will target nursing homes and residential care facilities in an effort to reduce occupational illnesses and injuries. It wasn't long ago that a healthcare facility could turn to OSHA for guidance, consultation, training, and other forms of assistance—but those days are gone! OSHA is now about enforcement and is using severe monetary penalties against long term care facilities to drive home this point.

From the April 5, 2012 OSHA news release:

Health care workers face numerous serious safety and health hazards, and the NEP will provide guidance to OSHA compliance staff on the policies and procedures for targeting and conducting inspections specifically focused on the hazards associated with nursing and residential care. These hazards include exposure to blood and other potentially infectious material; exposure to other communicable diseases such as tuberculosis; ergonomic stressors related to lifting patients; workplace violence; and slips, trips, and falls. Workers also may be exposed to hazardous chemicals and drugs.

Pendulum, LLC, in association with Sorensen, Wilder and Associates, is pleased to offer mock OSHA audits for long term care facilities. These audits, performed by certified and experienced healthcare safety professionals, provide a comprehensive review of a facility's safety management program, taking the same approach an OSHA compliance officer would take. Highlights include:

- A review of all written safety management plans and policies from a compliance perspective
- A review of training programs, including content, instructor qualification, learning objectives, and participation
- A physical plant tour that focuses on unsafe conditions in the facility that may contribute to employee injury or illness
- Interviews with random staff members
- Review of all OSHA-required records and record-keeping practices
- An evaluation of the use of engineering and work practice controls in protecting employees from illness or injury
- Safety committee activities

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& Associates
Specializing in Safety & Security Solutions

By participating in a mock audit, your facility will recognize a number of benefits, including:

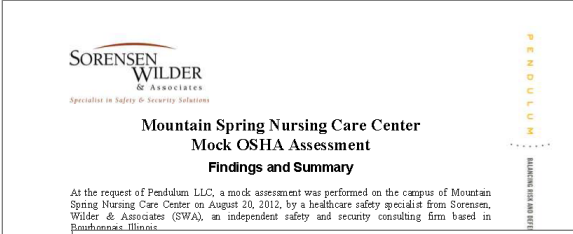
- The opportunity to identify and correct areas of noncompliance without the concern of severe monetary penalties
- Access to qualified healthcare safety professionals to answer questions regarding your safety management program and practices
- The information needed to prepare a strategic plan for safety improvements as well as interim action plans designed to minimize the risk for those items that may require financial planning and capital investment
- The ability to show OSHA that a facility is being proactive in managing workplace safety and has taken steps to minimize the risk to workers and maximize workplace safety because it is the right thing to do

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After the audit, a written report is produced using a format similar to that used by OSHA. Along with recommendations for improvements, an estimate is provided of what the potential monetary penalties against a facility would be for each violation or deficiency noted. Thus, a facility quickly realizes the serious financial exposure it could face. The value is not only in the investment staff has made in the audit, but more importantly, it is in the investment made in managing workplace safety.

Call Pendulum today for more information on these mock OSHA audits and add your name to the growing list of facilities that are taking advanced, proactive steps.



**Mountain Spring Nursing Care Center
Mock OSHA Assessment
Findings and Summary**

At the request of Pendulum, LLC, a mock assessment was performed on the campus of Mountain Spring Nursing Care Center on August 20, 2012, by a healthcare safety specialist from Sorensen, Wilder & Associates (SWA), an independent safety and security consulting firm based in Bensenville, Illinois.

Mountain Spring Nursing Care Center

Scope of This Report

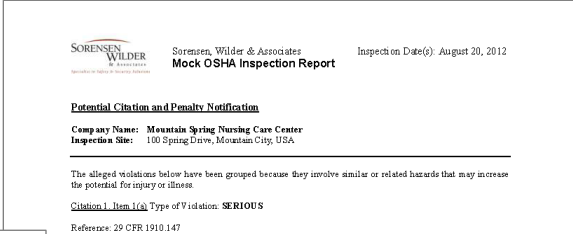
This report represents the consultant's observations, findings, and recommendations to strengthen the quality of the safety program without impeding the course of business or the mission of the facility.

All observations, comments, and recommendations presented in the report are strictly from the perspective of an independent safety consultant. Nothing within this report is intended to be a personal criticism of the management, mission, employees, policies, practices, or procedures of Mountain Spring Nursing Care Center.

In performing the mock assessment, all elements of a safety management program must be considered in order for the assessment to be a true representation of the status of the program. To achieve this goal, SWA assessed the safety program at Mountain Spring Nursing Care Center in four critical areas:

- Safety management
- Hazard recognition and control
- Safety Committee
- Documentation and record-keeping

Critical Findings



Potential Citation and Penalty Notification

Company Name: Mountain Spring Nursing Care Center
Inspection Site: 100 Spring Drive, Mountain City, USA

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 1, Item 1(a) Type of Violation: **SERIOUS**

Reference: 29 CFR 1910.147

a) Control of Hazardous Energy—locks and keys are provided, but there is no tagout system for energy.

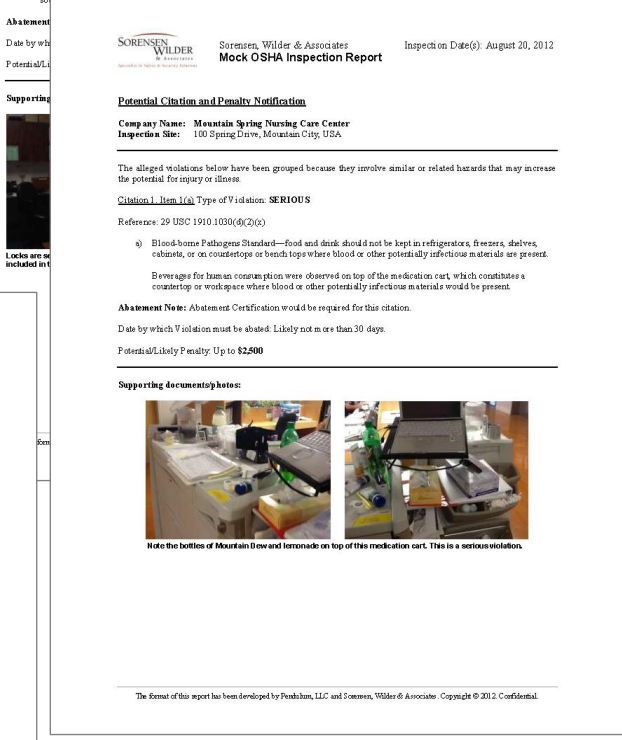
Abatement

Date by which Violation must be abated: Likely not more than 30 days.

Potential/Likely Penalty: Up to **\$2,500**

Supporting documents/photos:

None.



Potential Citation and Penalty Notification

Company Name: Mountain Spring Nursing Care Center
Inspection Site: 100 Spring Drive, Mountain City, USA

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 1, Item 1(c) Type of Violation: **SERIOUS**

Reference: 29 USC 1910.1030(d)(2)(c)

a) Blood-borne Pathogens Standard—food and drink should not be kept in refrigerators, freezers, shelves, cabinets, or on countertops or bench tops where blood or other potentially infectious materials are present.


Beverages for human consumption were observed on top of the medication cart, which constitutes a countertop or workspace where blood or other potentially infectious materials would be present.

Abatement Note: Abatement Certification would be required for this citation.

Date by which Violation must be abated: Likely not more than 30 days.

Potential/Likely Penalty: Up to **\$2,500**

Supporting documents/photos:



Note the bottom of Mountain Dew and lemonade on top of this medication cart. This is a serious violation.

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