



Loss Control Bulletin

First Aid Program

According to OSHA, every employer has an obligation to provide some level of health care for their employees in the event of a sudden illness or injury in the workplace.

OSHA's standard for first aid training in general industry, 29 CFR 1910.151(b), provides:

In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available.

In the construction industry, 29 CFR 1926.50(c) provides:

In the absence of an infirmary clinic, hospital, or physician, that is reasonably accessible in terms of time and distance to the worksite, which is available for the treatment of injured employees, a person who has a valid certificate in first-aid training from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence, shall be available at the worksite to render first aid.

Employers are required to provide medical and first aid personnel and supplies corresponding with the hazards of the workplace. The details of a workplace first aid program are dependent on the circumstances of each workplace and employer.

The primary requirement addressed by these standards is that an employer must ensure prompt first aid treatment for injured employees, either by having a trained first aid provider available at the worksite, or by ensuring that emergency treatment services are within the reasonable proximity of the worksite. The basic purpose of these standards is to ensure that adequate first aid is available in the critical minutes between the occurrence of an injury and the availability of physician or hospital care for the injured employee.

One option these standards provide employers is to ensure that a member of the workforce has been trained in first aid. For most employers, this option is a feasible and low-cost way to protect employees and comply with the standards. OSHA recommends, but does not require, that every workplace include one or more employees who are trained and certified in first aid, including CPR.

The other option for employers is to rely upon the reasonable proximity of an infirmary, clinic, or hospital. OSHA has consistently taken the view that the reasonable availability of trained emergency service providers, such as fire department paramedics or EMS responders, would be equivalent to the "infirmary, clinic, or hospital" specified by the literal wording of the standards. Emergency medical services can be provided either on-site or by evacuating the employee to an off-site facility in cases where the employee can be transported safely.

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OSHA standard 1904 Recording and Reporting Occupational Injuries and Illness (1904.7 (b)(5)(ii) defines "first aid" as the following:

- **A.** Using a nonprescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes);
- **B.** Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment)
- **C.** Cleaning, flushing or soaking wounds on the surface of the skin;
- D. Using wound coverings such as bandages, Band-Aids[™], gauze pads, etc.; or using butterfly bandages or Steri-Strips[™] (other wound closing devices such as sutures, staples, etc., are considered medical treatment);
- E. Using hot or cold therapy;
- **F.** Using any non-rigid means or support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes);
- **G.** Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.).
- H. Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;
- Using eye patches;
- **J.** Removing foreign bodies from the eye using only irrigation or a cotton swab;
- **K.** Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;
- L. Using finger guards;
- M. Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes); or
- N. Drinking fluids for relief of heat stress.

First Aid Kit Contents

OSHA does not require employers to have a specific first aid kit or specific contents. American National Standard Institute (ANSI) has designed a reference list for this titled Minimum Requirements for Workplace First Aid Kits and Supplies. First aid kits that meet these requirements will provide a small business with proper first aid supplies to assist with most types of injuries that may occur. For large operations, employers should determine how many first aid kits are needed, and if it is appropriate to augment the kits with additional first aid equipment and supplies.

Injury Reporting

Employers should require that all employees report an injury immediately, regardless of the extent of the injury. This means that there should be a written first aid program in place that outlines the procedures to be followed in the event of a workplace illness or injury.

In all cases involving a workplace injury, the employee must provide a First Report of Injury form to their employer within eight hours of the incident. The employer must review the report to determine if further action is required, such as a First Report of Injury form to Western National Insurance Group or an entry in the OSHA 300 Log.

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In situations where an employee has a truly life threatening condition, local fire, police, or ambulance services should be notified immediately. Dial 9-1-1 or the local emergency phone number for immediate emergency assistance.

In a perfect world, there would be no illnesses or workplace injuries. But until then, employers must be prepared to provide emergency care for their employees. What happens during the first five minutes of a medical emergency can make all the difference when it comes to saving a life.

References & Resources

29 CFR 1910.151 - Medical services and first aid

OSHA Best Practices Guide: Fundamentals of a Workplace First Aid Program

https://www.osha.gov/Publications/OSHA3317first-aid.pdf

ANSI Z308.1 – 2009, Minimum Requirements for Workplace First Aid Kits

https://www.dli.mn.gov/OSHA/PDF/fact_firstaid.pdf

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