

## Update on Infection Control Requirements: Do all staff need to attend OSHA training?

Featured News

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Several dentists have contacted the CDA asking whether all office employees must now attend an OSHA training course, rather than sending just one designee.

OSHA training requirements have not changed. Training is and has always been required for all dental office employees who are at risk for occupational exposure. The requirements outlined by OSHA include:

1. Training must be provided at the time of initial employment and at least annually thereafter.
2. Annual retraining of employees must be provided within one year of their original training.
3. Such training must be provided at no cost to the employee and during working hours.
4. Part-time and temporary employees, and employees, known as "per diem" employees, are covered and are also to be trained on company time.
5. Training must provide the opportunity for interactive questions and answers with the person conducting the training session. Training employees solely by means of a film or video without the opportunity for a discussion period would not be considered acceptable.
6. During an inspection, an OSHA Compliance Officer would interview a representative number of employees to determine if the training was presented in a manner that was appropriate.
  - o Trainees must have direct access to a qualified trainer during training.
  - o The person conducting the training must be knowledgeable in the subject matter covered by the elements contained in the training program as it relates to the workplace that the training will address.
  - o The trainer must demonstrate expertise in the area of the occupational hazard of bloodborne pathogens, and must be familiar with the manner in which the elements in the training program relate to the particular workplace.
  - o The OSHA Compliance Officer should verify the competency of the trainer based on the completion of specialized courses, degree programs and work experience.

Thus, all OSHA training, including in-house trainings for office staff, must be provided by a qualified expert. OSHA has clarified that attendance at one training course may not be sufficient to qualify a staff member to train others in the office. For a staff member to be qualified to train others in the office requires ongoing study, training and a sufficient level of expertise. The in-office training must be taken seriously, provided regularly and contain thorough information.

For offices that would like to designate training duties to one or two staff members, be sure these persons are appropriately qualified to train, that full staff training actually occurs and that you document each staff member's training appropriately in your records.