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# INSIGHTS

## SAFETY FIRST!

### How to conduct an effective safety audit

By Karen Appold

Laboratory safety should be everyone's top concern. One way to ensure a safe environment is to perform an annual safety audit. The benefits will abound.

"Ultimately, a safety audit will raise a laboratory's awareness of potential problems and situations before they occur, and should also prevent occurrences," says Elizabeth H. Staubs, MT(ASCP)SH, president/CEO, Tri-State Laboratory Consulting, LLC. "Performing an audit could prevent an injury as well as the liability that could follow."

It is the employer's responsibility to provide a safe work environment for employees and it is the employee's responsibility to follow safe work practices and attend training to remain compliant with all practices established by the Occupational Safety & Health Administration (OSHA), says Lynn R. Glass, BS, MT(ASCP), owner, MedSol, Inc. Safety audits help ensure compliance and provide quality assessment (QA) of safety indicators.

"An annual safety audit is a great way to keep on top of things," says Cynthia Cardelino, MLT(ASCP), MT(HEW), education curriculum specialist, COLA. OSHA performs occasional random inspections as well as inspections in response to complaints about safety violations or hazards. Ensuring that all employees adhere to all applicable OSHA regulations, at all times, is the only way to ensure that your facility would pass an unexpected OSHA inspection.

Although OSHA, CLIA, and COLA do not mandate that periodic safety audits be conducted, audits are required annually by The College of American Pathologists and The Joint Commission.

### Designating an Auditor

When choosing someone to perform a safety audit, Ms. Staubs recommends selecting someone with both technical and health care expertise who understands the complexities of job roles and tasks. "An office manager may be well suited to evaluate the effectiveness of a fire evacuation plan and compliance with fire code regulations for a physical building, but may not be familiar with methods of compliance for bloodborne pathogens (BBP) in regard to proper handling of sharps or disinfecting of instruments," she states.

"From my experiences I have found that technical individuals working in auditor roles may know what needs to be done, but don't have the administrative authority for implementation," Ms. Staubs continues. "In other cases the employees know what regulations they should follow, but they don't, and administration doesn't have enough knowledge about tasks and procedures to enforce compliance. It usually takes an outside consultant to say, 'Yes, this is a requirement. It must be done; otherwise there could be both legal and financial consequences.'"

After an outside consultant has performed an initial evaluation, Michael Staubs, OSHA consultant and trainer, Tri-State Laboratory Consulting, LLC, suggests training employees to perform safety audits and

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**FROM THE CHAIR** As the new Chair of the COLA Board of Directors, I am excited by the commitment of both the Board and the COLA staff. We are looking to the future with a focus on education and customer service.

I am a family physician practicing at the Hutchinson Clinic in Hutchinson, Kansas and I serve as director of the clinic's laboratory. My undergraduate training and bachelor's degree were in medical technology, and I worked as a Medical Technologist while studying for a Masters degree in laboratory management and administration. I attended medical school at the University of Nebraska and completed a residency in Family Medicine at St. Joseph's Hospital, Wichita, KS.

I enjoy serving on the faculty of the COLA Symposium for Clinical Laboratories, guiding novice laboratory directors to qualify as a lab director for moderate complexity and be successful in the director's role. The next COLA Symposium for Clinical Laboratories will be held in Lake Buena Vista, Florida, September 16-19, 2009.

I am proud to introduce the latest issue of Insights. COLA's mission is to promote quality and safety in laboratory medicine, and this publication highlights the ways this can be accomplished.

Verlin K. Janzen, MD, FAAFP  
Chair, COLA Board of Directors

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then rotating this role among them. "This will increase awareness among employees regarding knowledge of safety procedures and responsibilities, as well as give ownership of the overall safety plan to everyone," he says.

Another approach, according to Glass, is to designate an employee as a safety officer. This person should participate in OSHA and safety workshops or lectures to obtain updates, acquire training guides, and provide annual updates and training to co-workers.

Still another school of thought is to have audits done by someone who is unfamiliar with the site. "This individual will be able to spot safety deficiencies that may have been overlooked by that site's safety officer due to familiarity or complacency," says Charlene Waybright, CLS(NCA), MT(ASCP), clinical laboratory scientist, Carilion Labs.

#### Performing an Effective Audit

A safety audit should include an assessment of all of the following applicable categories: general safety, fire, electrical, compressed gases, radiation, BBP, chemical hygiene, eyewash and shower, waste management, and ergonomics.

To perform an effective safety audit, compile a checklist that addresses all applicable categories. Practices may create their own checklists or they can purchase them from outside companies that specialize in safety practices.

Following is a list of items that Glass feels should be reviewed and/or updated during a safety audit.

- All OSHA/safety manuals.
- Material Safety Data Sheets (MSDS) and hazardous chemicals list.
- Job classifications of employees with regard to exposure.
- Current biomedical waste plan and pickup.
- Evaluation of safety devices.

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#### COLA INSIGHTS

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The Self-Assessment is a valuable tool to prepare for every COLA survey, not just your first onsite visit! Personnel, test menu, and instrumentation can change, leaving you vulnerable to new deficiencies. You also want to ensure that any deficiencies noted during a prior survey have been corrected and those improvements continuously maintained. Repeat citations can have serious consequences!

The Self-Assessment is a voluntary internal audit—a "check-up" for your lab that helps identify areas of noncompliance so you can improve your laboratory practices and ensure excellent patient care as you prepare for your onsite survey.

The Self-Assessment questions are the *COLA Criteria for Quality Laboratory Performance*. These are the exact same questions your surveyor will use to evaluate your laboratory during your survey, and you'll find them in Section III of the Accreditation Manual (on CD or the Member website at [www.cola.org](http://www.cola.org)). Call COLA or go to the member website to get an on-line form and more information about the process. Instructions for completing the questionnaire are provided on the answer form.

As you complete the Self-Assessment, indicate whether or not your laboratory is in compliance for each applicable criteria. Be honest in your answers, indicating what your laboratory is currently and actually doing, not what you have become aware that you should be doing. Your goal is to objectively evaluate how well your laboratory currently complies with the COLA criteria.

Return your completed form to COLA for review. If any deficiencies or problem areas are found, COLA will send you helpful information to make improvements and meet the requirements. We guide you to make appropriate changes in laboratory operations, processes, and procedures to come into compliance with all applicable COLA accreditation criteria BEFORE your survey.

COLA has found laboratories that complete the Self-Assessment and put dedicated effort into the process have done better, as a whole, on their surveys. It is an educational process that works, so take advantage of the benefits!



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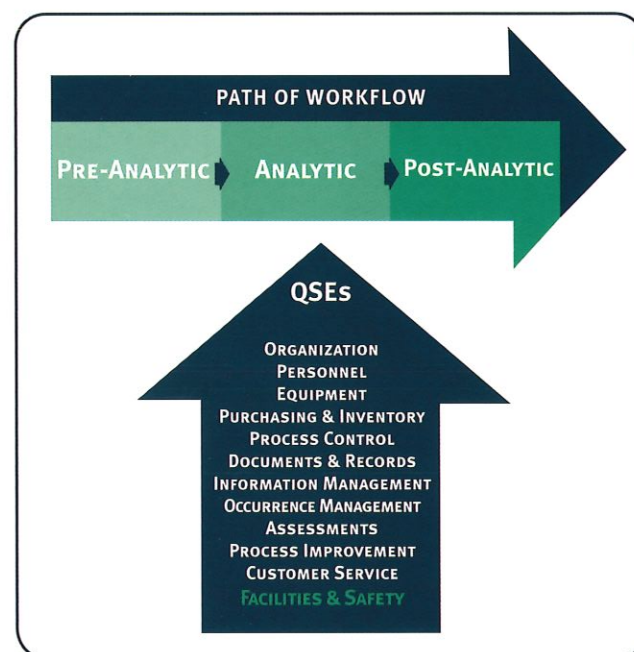
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## INSIGHT INTO QMS

## QSE: Facilities and Safety

Quality Management Systems (QMS) is a systematic approach to quality management with a focus on error prevention and efficiency. The goal is to take quality and effectiveness to a higher level of performance. The Quality System Essentials (QSEs) work together to comprise a quality management system, supporting the path of workflow and forming the foundation of the laboratory's operations.



This QSE examines your laboratory's physical space and the maintenance and safety programs needed to support it. In the LabUniversity® course *QSE: Facilities and Safety*, written by Lucia M. Berte, MA, MT(ASCP)SBB, DLM; CQA(ASQ) CMQ/OE, you will find details on these three important points:

1. You need to consider the amount of space that has been allotted for your laboratory's services and the design of the space with regard to your laboratory's path of workflow. Your laboratory needs to have space allocated and designed so that the workload can be performed without compromising the:

- Quality of work
- Quality of control procedures
- Safety of laboratory personnel
- Safety of patients and visitors

2. Your laboratory needs to keep its space clean and well maintained.

3. Depending on the scope of your laboratory's services, you will need to implement all of these safety programs that are applicable:

- Emergency Preparedness
  - Fire
  - Weather-related
  - Disasters
  - Extended power loss
- Chemical Hygiene
- Bloodborne Pathogens Safety
  - Exposure Control Plan
  - Engineering and work practice controls
  - Personal controls
- Incident Reporting
- Radiation Safety

For details about this QSE and Quality Management Systems (QMS), see the LabUniversity® QMS courses available from the COLA Store at [www.cola.org](http://www.cola.org).

*You can also hear Luci Berte and other great speakers present QMS sessions at the COLA Symposium for Clinical Laboratories, Sept. 17-19, 2009 in Orlando, Florida.*

*Here are some of the other great QMS sessions we have at the Symposium for you to choose from:*

- *Understanding the Cost of Quality*
- *QSE : Personnel*
- *Diving Into Lean for the Lab*
- *Root Cause Analysis*
- *Write it Right: Better Laboratory Documents*
- *Change Management*
- *Making Lemonade from Laboratory Nonconformances*
- *How to Create a Quality Manual*

*SAFETY FIRST! ~ How to conduct an effective safety audit continued from page 2*

- Needlesticks and sharps injury documentation with post-exposure assessment, treatment, and follow up.
- Labeling of biohazardous material.
- Personnel records, including Hepatitis B vaccine or declination form and annual tuberculosis skin test (PPD).
- Annual OSHA/safety training for all identified personnel.
- Evacuation and disaster plan.
- Information on ergonomics for various job descriptions.

Glass advises having staff members accompany the auditor, so everyone understands regulatory requirements and how to follow them.

## Ensuring Compliance Year-Round

By adhering to rules and regulations throughout the year and by doing periodic checks, you'll increase safety compliance and decrease the chances of finding violations during a lab audit or inspection.

Glass advises using your lab's QA plan and periodically reviewing various indicators to assess continued compliance. "My QA plan includes an annual safety walkthrough," she says.

To ensure that employees always adhere to applicable OSHA regulations, Ms. Staubs recommends that they be required to sign a statement included in the employee handbook when hired that they will comply with a facility's regulations and guidelines. This statement should specify consequences for non-compliance. It should also be listed as part of the job description that is signed upon hire, and it should be included as a specific item in an employee's annual performance evaluation.

Some additional ways to ensure that employees follow OSHA regulations is via signage, safety discussions in monthly department meetings, and required annual safety in-service days, Waybright says.

## Complying with the BBP Standard

The most frequently cited OSHA violation in medical offices and laboratories is failure to comply with the BBP Standard,<sup>1</sup> which was issued by OSHA in 1991 to protect workers from risk of exposure.

OSHA defines BBP as pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include Hepatitis B, Hepatitis C, and HIV/AIDS.

In 2001, in response to the Needlestick Safety and Prevention Act, OSHA revised the BBP Standard. It clarifies the need for employers to select safer needle devices and to involve employees in identifying and choosing these devices. The updated standard also requires certain employers to maintain a log of injuries from contaminated sharps.<sup>2</sup>

Another stipulation of the standard is that annual safety training must be given to all laboratory employees who have the potential to be exposed to BBP or chemical hazards. Any safety audit should include verifying that training occurred and was documented, Cardelino says.

## Exposure Control Plan

OSHA requires employers to implement a written exposure control plan (ECP) as part of their safety plan that outlines the specific measures management and employees will take to eliminate or minimize BBP exposures.

In her article "Introduction to Bloodborne Pathogens, Part 2—OSHA Regulations," items that Elaine Pappamihel, MT(ASCP), technical specialist, American College of Physicians advises employers to address in their ECP include:

- Identify who is at risk for exposure.
- Select and implement appropriate engineering and work practice controls to minimize exposures to blood and other potentially infectious materials (OPIM).
- Use of personal protective equipment if potential for exposure remains after the implementation of controls.
- Disinfect surfaces contaminated with blood and OPIM.
- Properly dispose of sharps and hazardous materials.
- Vaccinate any health care worker who performs tasks involving contact with blood or OPIM for Hepatitis B.
- Include policies and procedures to be followed in

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the event of an exposure incident, based on the U.S. Public Health Service guidelines.

- Use labels and signs to identify hazards.
- Provide training regarding the seriousness of exposure risk.
- Maintain a sharps injury log if a company has more than 10 employees. Review the log regularly to determine where and why injuries are occurring.

### Handling an Exposure Incident

If exposure to blood or OPIM occurs, follow protocols for immediate and subsequent treatment. Waybright says corrective action should be taken with the employee, such as extra safety training and re-reading the BBP Exposure Control Plan.

Document the occurrence on an incident report form. Include details about who was involved, what happened, where it took place, and how it happened. Also state any negative outcomes that resulted from the exposure and how the situation will be corrected so the incident won't reoccur, Glass says.

Terry Jo Gile, MT(ASCP) MA Ed., The Safety Lady®, notes the financial consequences of an OSHA violation. If you have documentation that an employee was counseled for a particular incident, the facility as well as the employee might be fined. If the employee was not counseled, then only the facility would be fined. Fines are a minimum of \$250 and up to \$7,000 per day per incident.

### Concluding Thoughts

Laboratory safety should be a top priority for both employers and employees. An annual safety audit can identify and prevent occurrences as well as ensure that a lab will pass an inspection with flying colors.

Karen Appold is an editorial consultant based in Royersford, PA. E-mail her at KarenAppold@comcast.net or visit her Web site at www.WriteNowServices.com.

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2. Bloodborne Pathogens and Needlestick Prevention. Available at: <http://www.osha.gov/SLTC/bloodbornepathogens/>

### Resources

The Safety Lady's lab safety audit checklist. Download for free at: [www.safetylady.com/articles/Laboratory\\_Safety\\_Audit.pdf](http://www.safetylady.com/articles/Laboratory_Safety_Audit.pdf)

For assistance with OSHA compliance, laboratories can contact their state's free OSHA Consultative Service.

Available at: <http://www.osha.gov/dcsp/smallbusiness/consult.html>

*Terry Jo Gile, The Safety Lady® will be presenting her popular safety training session at the Symposium for Clinical Laboratories, Sept. 17-19, 2009 in Orlando, Florida.*

See the full schedule and session descriptions at [www.cola.org/clinsym09.html](http://www.cola.org/clinsym09.html)

## LabUniversity News

New MLE CEexpress Course Coming in September

### MLE CEexpress 8: Introduction to Bloodborne Pathogens

MLE CEexpress 8 contains two articles about the OSHA bloodborne pathogens standard and properly training laboratory personnel to ensure safety. Students read the articles, take the quiz, and earn 1 P.A.C.E.® credit.

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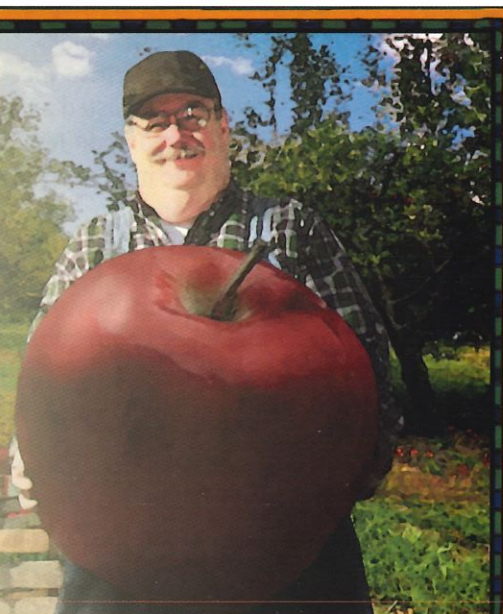
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Look for other discounted courses in upcoming issues of Insights. We want to help keep continuing education affordable for labs!