





Regulatory Compliance

Safety Standard Spotlight: First-Aid Kits

Julie Sullivan | Aug 10, 2017

What You Need to Know

OSHA's regulation for first aid is not as simple as it reads (and may not be the only regulation needing attention; note your state's law).

ANSI has set in motion new standards for first-aid kits for businesses.

The kits are separated into two types: Class A kits and Class B kits. Each type has individual specifications for its contents.

<u>Use injury logs and incident reports to help guide the contents of a kit, plus seek advice from local</u> safety and injury experts.

The standards for first-aid kits have become more precise with the last change in 2015. Here's what safety managers need to know.

Why do the standards for first-aid kits keep changing? *First-aid kits* are evolving to meet the injury needs across many industries and the variety of work environments, so safety managers, too, need to keep pace with the most current ANSI/ISEA Z308.1-2015 standards—and stay on top of local and state laws.

The Occupational Safety and Health Administration's regulation for first aid, **29 CFR 1910.151 (b)**, is seemingly simple to understand:

"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."

Interpreting the law, however, can be a murky experience.

"Employers should be mindful that the meaning of 'adequate' depends on the workplace," **notes** Craig Simonsen of the Seyfarth Shaw workplace-safety law blog. "Accordingly, employers should evaluate the kinds of injuries that occur in their workplaces when deciding on the contents and quantity of materials in a first-aid kit."

What does it mean to have first-aid supplies "readily available" for all workers in all situations? What if

workers are on the move? And what about having "adequately trained" persons?

These are the kind of questions compliance bodies such as the Department of Labor determine and safety managers have to answer—and so the standards' bodies do everything they can to work with industry to make more specific guidance.

But it doesn't end there. Some states use the OSHA regulation as the bare minimum requirement—so compliance can vary widely.

"Some state-plan states may have slightly different or more stringent requirements than those of federal OSHA," *writes* Lisa Neuberger, a compliance specialist with J.J. Keller & Associates, in an American City Business Journals article. "In California, CalOSHA requires that a physician approve the contents of workplace first-aid kits. If you are in a state-plan state, be sure to check your state's requirements."

In June of 2015, the American National Standards Institute set a list of the minimum *first-aid kit requirements* for businesses, and they were put into effect a year later in 2016. The previous update, the 2009 standard, is no longer compliant, meaning many companies will need to revisit the details of their kits—if they haven't already.

The kits are classified into two types, each with their own specifications.

ANSI and the International Safety Equipment Association (ISEA)—Minimum Requirements for Workplace First-Aid Kits and Supplies (ANSI/ISEA Z308.1-2015) requires that businesses have first-aid kits on hand to deal with injuries and illnesses associated. The kits are divided into two classes, A and B.

"If it were my business or a client I was advising, I would certainly opt for a \$19 upgrade pack over risking thousands of dollars in fines."

Matthew Henry

Managing safety consultant for Express Companies Inc.

What are the Differences Between Class A First Aid Kits and Class B First Aid Kits?

Class A kits are more standard, accounting for common workplace injuries and in locations where danger is not a huge issue. From the last ANSI safety kit update, business owners will only need to acquire 22 additional pieces to adhere to the new rules. Alternatively, Class B kits are a bit more robust, and could potentially require business owners to add 145 extra pieces to their cabinets.

For example, while both Class A and Class B kits require trauma pads, businesses that fall into the latter category will need double the supply. Similarly, Class B kits require more than double the amount of burn treatment solution, sterile pads, bandages (both adhesive and triangular) and hand sanitizer. They'll also need a splint—something Class A businesses don't necessarily need to worry about.

"The multitiered approach of designating kits allows employers to make practical choices based on the nature of the work area, recognizing that each workplace differs in potential risk and task load," says David Lapp, chairman of ISEA's first-aid group and senior product manager at Honeywell Safety Products, in an interview with *Occupational Safety*. "By expanding the items in a basic first-aid kit, employees will have greater access to items needed to treat their injuries as quickly as possible."

There are more than simply two new classes. There are also four types (I, II, III, IV) in the *standard*, which were created to address the variety of different workplace environments including the ability to address: portability, ability to be mounted, resistance to water, and corrosion and impact resistance.

How to Help Ensure Compliance with OSHA Regulations & ANSI Safety Standards

So, how does a safety manager decide what exactly to put inside a first-aid kit?

To start, experts advise businesses should review their OSHA 300 logs and 301 incident reports to help estimate what type of injuries their workplace might be prone to. Consulting a medical professional or local rescue and safety professionals (such as fire safety professionals, the American Red Cross and local OSHA contacts) is *highly advised*.

"Employers should consider what types of injuries could be reasonably anticipated at their worksites ... Part of this analysis can include evaluating OSHA 300 logs and workers' compensation claim histories at the worksite," notes Simonsen. "If an employer determines that medical services are not in 'near proximity,' then first-aid training must be provided to ensure that someone with such training is available during all shifts. First-aid training ... refers to medical attention that is typically administered immediately after an injury occurs. It usually consists of one-time, short-term treatment and requires minimal technology and training, such as cleaning minor cuts, treating minor burns, applying bandages and using nonprescription medicine."

When stocking your kit, you'll also want to take into account the number of employees at your facility and who might use the kit. For example, does the nature of your work make your team susceptible to burns? Stocking burn dressing and treatment tools will be even more critical.

Please note, as Simonsen points out, that first aid does not include CPR or automatic external defibrillators (AEDs), but "employers should consider providing them in the workplace given their lifesaving capabilities."

While stocking a first-aid kit will be customized to the environment, erring on the side of caution will be your best bet, according to Matthew Henry, managing safety consultant for Express Companies and an OSHA safety consultant. Henry told *Fast Casual*:

"While specific industries such as welding, construction and logging have their own regulatory requirements, all safety regulations, from Federal OSHA to each OSHA-approved state plan, refer to the ANSI Z308.1 standard requirements for compliance. If it were my business or a client I was advising, I would certainly opt for a \$19 upgrade pack over risking thousands of dollars in fines."

Is your shop stocked with the appropriate first-aid kit, whether Class A or Class B? Let us know in the comment section below.

For the most recent ANSI Z308.1-2021 standard, effective October 15, 2022, click here.

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