

# Cal/OSHA Requirements for Veterinary Practices

All California businesses with employees are subject to Cal/OSHA regulation and oversight. Cal/OSHA regulations require every employer to have a written safety plan created specifically for their business. In addition, Cal/OSHA requires an active safety program that includes ongoing self-inspections and employee training, documentation, and record keeping, as well as certain workplace postings. No two safety programs or written plans will be identical, but certain core components should be addressed in all veterinary practices.

### The Written Illness and Injury Prevention Program

California Code of Regulations, Title 8, Section 3203 requires that all California employers have a written Illness and Injury Prevention Program (IIPP) available for employees. The IIPP must include the following components:

- **Responsibility**—the name and/or job title of the person(s) with the authority and responsibility for the IIPP's implementation
- **Compliance**—a system to ensure that employees comply with safe and healthful work practices
- **Communication**—a system for communicating with employees about safety and health matters in a form easily understood by and accessible to employees
- **Hazard assessment**—procedures for identifying and evaluating workplace hazards, such as periodic inspections performed by a competent observer
- **Accident/exposure investigation**—a procedure to investigate workplace injuries and illnesses
- **Hazard correction**—methods and procedures for correcting all existing workplace hazards and unsafe or unhealthful work conditions/practices in a timely manner
- **Training and instruction**—an effective training program to instruct employees on general safe work practices and hazards specific to each job assignment
- **Keeping records**—adequate written documentation of the steps taken to establish and maintain the employer's IIPP

Due to the unique nature of veterinary practice, certain additional policies and programs beyond an IIPP will be necessary. The following may apply:

- **A Hazard Communication Program** is required for all businesses in which employees come into contact with hazardous substances. This program must include a list



of hazardous substances, safety data sheets for each, and a workplace ("secondary") labelling system. \*Part of the Hazard Communication Program includes extensive requirements for a COVID-19 Worker Protection Policy.

- **A Fire Prevention Plan** that includes specific information about potential fire hazards in the workplace and how to mitigate or manage them as well as the name of the person responsible for the program, and a maintenance plan for fire protection equipment.
- **An Emergency Action Plan** containing an evacuation plan, including emergency escape procedures (with clearly marked exits) and employee training with clearly assigned roles and responsibilities.
- **A Heat Illness Prevention Program** for businesses that regularly employ outdoor workers. This program includes certain requirements for the maintenance of supervision, training, water, rest, and shade.
- **A Zoonotic Disease Control Program** requires veterinary practice employers to establish, implement, and maintain effective procedures for preventing employee exposure to zoonotic aerosol transmissible pathogens.
- **A Wildfire Smoke Inhalation Protection Program** must be maintained if employees face prolonged exposure to wildfire smoke.
- **An Anesthetic Gas Monitoring Program** must be implemented for all employees who work near anesthetic gas or who handle patients recovering from anesthesia.
- **A Hearing Conservation Program** may be necessary if certain noise levels are present in your practice (such as in a kennel).



- **A Laser Safety and Training Program** should be maintained for any employees who utilize or work near a Class III or higher laser.
- And several more, depending on individual practice circumstances. In addition, businesses with more than 10 employees must record information about certain workplace injuries, illnesses, or deaths (Log 300) and post a summary for employees during certain times of the year (Log 300A).

### Workplace Inspections

Nearly all of the aforementioned programs require a periodic inspection by a qualified, trained individual. This person is usually named in each written policy. While Cal/OSHA does not specify the frequency with which workplace inspections should occur, it is clear that they must take place often enough to ensure workplace safety and regulatory compliance.

### Worker Safety Training Program

Workers must be trained on the written policies listed above. Training should take place not only for all newly hired employees as a component of job orientation, but should also be provided on an ongoing basis for all employees. Documentation of training, including proof of employee attendance, is helpful. In lieu of live, interactive teaching, training can be offered as online or printed materials for self-guided study but should always provide workers with a person who can answer questions.

### Workplace Postings

In California, all employers must meet workplace posting obligations. Cal/OSHA requires over two dozen postings for employees relating to wages, hours, sick leave, protections afforded to workers under the law, and working conditions, to name just a few. These notices must be posted in an area frequented by employees, where it may easily be read during the workday.

### In Closing

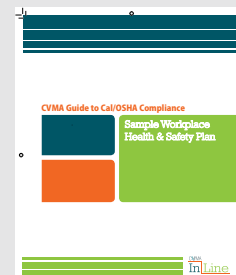
Taking time to satisfy Cal/OSHA requirements will mitigate enforcement action in the event of a workplace illness, injury, death, or complaint. For more information about complying with Cal/OSHA workplace requirements in veterinary practices, visit [www.cvma-inline.net](http://www.cvma-inline.net) and click "Workplace Safety." ■

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## Subscribe to the CVMA Guide to Cal/OSHA Compliance

Cal/OSHA requires a current written plan and active ongoing health and safety program in every workplace.

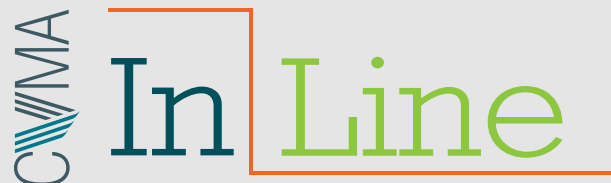
**The CVMA Guide to Cal/OSHA Compliance has everything you need to assure your practice is compliance ready!**



The guide with an interactive step-by-step process creates a written plan customized for your veterinary practice and guidance on implementing your Cal/OSHA program.

- A customized written safety and health plan with policy statements
- Training information for designated safety coordinator(s)
- Workplace inspection checklists and report forms
- Required posting information
- Employee training resources
- Record keeping assistance
- **New!** COVID-19 Protection Program

**To order the CVMA Guide to Cal/OSHA Compliance, visit [cvma-inline.net](http://cvma-inline.net), or contact the CVMA at 800.655.2862.**



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