I. Purpose. This instruction establishes policies and provides clarifications to ensure uniform enforcement and interpretation of MIOSHA standards requiring medical services and first aid.

II. Scope. This instruction applies agency-wide.

III. References.
   A. Agency Instruction MIOSHA-STD-07-1 Emergency Eyewash/Shower Equipment Rules, as amended.
   D. MIOSHA-300 Log of Work Related Injuries and Illnesses.
   E. MIOSHA Field Operations Manual (FOM), as amended.
   F. Michigan Department of Licensing and Regulatory Affairs (LARA), Michigan Occupational Safety and Health Administration (MIOSHA), Consultation Education and Training (CET) Division, Publication #5230 – Bloodborne Infectious Diseases Sample Exposure Control Plan (Limited Exposure).
   G. Occupational Health Standard Part 472. /R325.47201 et seq., Medical Services and First Aid.
   H. Occupational Health Standard Part 554. /R325.70001 et seq., Bloodborne Infectious Diseases.

IV. Distribution. MIOSHA Staff; OSHA Lansing Area Office; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.

V. Cancellations. All previous versions of this agency instruction.

VI. History: History of previous versions include:
    MIOSHA-STD-08-3R2, January 17, 2012
    MIOSHA-STD-08-3R1, December 3, 2008
    MIOSHA-STD-08-3, October 1, 2008

VII. Contact. Barton G. Pickelman, Director

VIII. Originator. Barton G. Pickelman, Director
IX. Significant Changes.
   A. Revisions to references to first aid or medical services requirements in the diving standards.
   B. Revisions to references to first aid, medical services, and safety data sheet requirements in the hazard communication standards.

X. General Industry Requirements.
   A. Occupational Health Standard Part 472, Medical Services and First Aid.
      1. The employer shall ensure the ready availability of medical personnel for advice and consultation on matters of plant health. [Part 472. Rule 325.47201(1)]
         a) The necessity for consultation is determined by the types of hazards (chemical, physical) found in the workplace and an ongoing analysis of the employer’s MIOSHA-300 (Log of Work Related Injuries and Illnesses), workers’ compensation data, and workplace safety and health surveys.
         b) To meet the Michigan Occupational Health standard requirements, first aid care shall be readily available to employees during all working hours. However, this standard does not necessarily require first aid facilities in all places of employment.
      2. In the absence of an infirmary, clinic, or hospital in near proximity to the workplace, an employer shall ensure the ready availability of a person or persons who are adequately trained to render first aid. To determine “near proximity,” MIOSHA will consider the following:
         a) In areas where serious accidents may occur such as those involving falls, electric shock, amputations, or severe chemical exposures that could result in suffocation, severe bleeding, or other life threatening injury or illness, a maximum three- to four-minute response time is required.
         b) In other circumstances where a life-threatening injury is unlikely (e.g., low hazard workplaces such as offices), a maximum 15-minute response time is acceptable.
      3. Where a remote location or a single employee worksite exists, an employer shall develop and implement a written plan that provides for and assures the prompt medical treatment of employees working at such locations. Methods for assuring prompt medical attention in the event of an emergency may include, but are not limited to following:
         a) Provide employee(s) with a means of communication such as a cell phone, two-way radio, or panic button alert system that could be activated to summon emergency services.
b) Implement a wellness verification procedure where the employee would periodically check in with a centrally staffed location on a set schedule.

c) Install a video monitoring system.

d) Train exposed and responding employees on the exact procedure to execute in the event of an injury.

4. An employer shall ensure the ready availability of first aid supplies in the workplace.

a) The contents of a first aid kit shall be approved by a consulting physician. Consideration shall be given to the following when selecting the contents, number, and placement of first aid kits at a worksite: the size of the worksite, the type of work, the number of employees, and past experience.

b) A first aid kit that contains items appropriate for the worksite will be considered in compliance with the rule.

B. All Other General Industry Standards with First Aid Requirements. See Appendixes A and B for other general industry-related standards with specific first aid requirements.

XI. Construction Requirements.


1. An employer shall ensure the availability of medical personnel for advice and consultation on matters of occupational health. The necessity for consultation is predicated by the types of hazards (chemical, physical) found in the workplace and through an ongoing analysis of the employer’s MIOSHA-300 (Log of Work Related Injuries and Illnesses), workers’ compensation data, and worksite safety and health surveys.

2. A person who has a valid certificate in first aid training shall be present at the worksite to render first aid. A certificate is valid if the requirements necessary to obtain the certificate for first aid training meet or exceed the requirements of the United States Bureau of Mines, the American Red Cross, or an equivalent training program that can be verified by documented evidence.

a) Although Cardiopulmonary Resuscitation (CPR) training is not a requirement, MIOSHA encourages employers to provide CPR training along with first aid training. A good share of construction accidents are not addressed in the basic first aid courses. A victim of an electric shock whose breathing and/or heart has stopped must receive immediate assistance from a CPR trained person or death is imminent within three to four minutes. Other types of construction accidents, such as falls, drowning, and cave-ins may also require
CPR. The Safety Officer/Industrial Hygienist (SO/IH) shall encourage employers to include CPR training along with any first aid training that may be provided.

b) A worksite located within or in close proximity to a functional infirmary, clinic or hospital is considered to have met this requirement.

3. Where a remote location or a single employee worksite exists, an employer shall develop and implement a written plan that provides for and assures the prompt medical treatment of employees working at such locations. The plan shall be communicated to all affected employees. This means the employer must have a written plan in place prior to initiating such projects. Methods for assuring prompt medical attention in the event of an emergency may include, but are not limited to:

a) Provide employee(s) with a means of communication such as a cell phone, two-way radio, or panic button alert system that could be activated to summon emergency services.

b) Implement a wellness verification procedure where the employee would periodically check in with a centrally staffed location on a set schedule.

c) Install a video monitoring system.

4. An employer shall ensure that there are first aid supplies at each jobsite and that the supplies are readily accessible.

a) The contents of a first aid kit shall be approved by a consulting physician. Consideration shall be given to the following when selecting the contents, number, and placement of first aid kits at a worksite: the size of the jobsite, the type of work, the number of employees, and past experience.

b) A first aid kit that contains items appropriate for the worksite will be considered in compliance with the rule.

c) First aid kit supplies shall be sealed in individual packages, stored in a weatherproof container, and inspected by an employer or designated representative prior to being sent out on each job and at least weekly thereafter. Depleted supplies shall be promptly replaced.

5. Where serious accidents such as falls, electric shocks, amputations, or severe chemical exposures could result in suffocation, severe bleeding, or other life threatening injuries or illnesses, the employer shall put measures in place to assure the prompt transport and medical treatment of injured personnel.
a) The employer must also provide a communication system for contacting the necessary emergency service.

b) The telephone numbers of a physician, hospital, or emergency service shall be conspicuously posted at the jobsite.

B. Other Construction Standards with First Aid Requirements. See Appendix C for other construction-related standards with specific first aid requirements.

XII. Citation Guidelines.

A. Serious. The SO/IH shall consider a serious violation after evaluating the following:

1. When a SO/IH encounters a workplace containing hazards or exposures that could result in a life threatening injury or illness and the employer has made no arrangements for first aid or medical treatment, and an incident has occurred, the SO/IH shall recommend a serious violation.

2. For other combinations of hazards, exposures, or lack of preparation, the SO/IH may contact their supervisor prior to recommending a serious violation. Before contacting their supervisor, the SO/IH shall evaluate the employer’s efforts with regard to the following:

   a) Identify and assess workplace risks that have potential to cause worker injury or illness.

   b) Identify emergency medical services and availability for all times of the day when employees are working. Response times for treatment must be planned taking into consideration normally anticipated delays such as auto or train traffic. Plans for response time must be reevaluated when conditions change.

   c) Designate available trained first aid providers and readily accessible location of first aid supplies.

   d) Communicate and make readily accessible contact personnel and phone numbers. Ensure this information is current.

   e) Instruct all workers about the first aid program, including what workers should do if a coworker is injured or ill.

B. Other-than-serious. The SO/IH shall consider an other-than-serious violation only after evaluation of the following:

1. A first aid violation has been determined and no incident has occurred.

2. Work activities that fall under the scope of a vertical standard that require first aid and the employer is in compliance with the requirements of that standard.

3. There are extenuating circumstances that affect the employer’s ability to comply (such as community-wide emergency conditions).
C. Grouping. Violations may be grouped where there are violations of multiple rules/standards involving the same hazard (e.g., first aid requirements, bloodborne infectious diseases requirements, and/or recordkeeping requirements). Violations shall be grouped in accordance with the FOM.

XIII. Bloodborne Infectious Disease Program.

A. Employees with assigned first aid duties in general industry are required to be protected by compliance with the MIOSHA Bloodborne Infectious Disease rules. The bloodborne infectious diseases standard does not apply to the construction and agriculture industries. For those industries that do not fall within the scope of the bloodborne infectious diseases standard, and a recognized hazard involving bloodborne infectious diseases has been identified, consideration shall be given to citing Section 11(a) of the MIOSH Act. Section 11(a) of the MIOSH Act (The General Duty Clause) provides that “an employer shall furnish to each employee, employment and a place of employment which is free from recognized hazards that are causing, or are likely to cause, death or serious physical harm to the employee.” Section 11(a) citations must meet the requirements outlined in the FOM, Chapter VI. Failure to implement all or any part of R325.70001 et al. can be used as the basis for a General Duty citation in construction and agricultural industries. However, R325.70001 et al. should never be referenced in a general duty citation. The requirements of R325.70001 et al. may be listed in a general duty citation.

B. The employer must develop a written exposure control plan that covers:

- exposure determination
- universal precautions
- engineering controls
- work practices
- personal protective equipment
- housekeeping
- regulated waste disposal
- laundry
- vaccination & post exposure follow-up
- communication of hazards to employees
- recordkeeping
- training

CET handout MIOSHA-CET-5230 provides a model written program for those situations where employees are expected to have limited (e.g., first aid) exposures.

C. If first aid is a "collateral duty," for example a production employee who may, on occasion, be called upon to provide first aid as a trained first aid team member, the employer may postpone the hepatitis B vaccination until such time the employee performs first aid where blood or other potentially infectious materials are present.

XIV. Guidelines for First Aid Kits. ANSI Z308.1-2009 “Minimum Requirements for Workplace First Aid Kits and Supplies” requires certain first aid supplies and quantities for compliance with Z308.1-2009 and recommends other items. The ANSI standard is a consensus standard and viewed as guidance but not enforced by MIOSHA.
Required:
Absorbent Compress – 1
(32 sq. in., minimum 4” side)
Adhesive Bandages (1”x 3”) – 16
Adhesive Tape (3/8” x 2.5 yd.) – 1
Antiseptic (0.14 fl. oz.) – 10
Burn Treatment (1/32 oz.) – 6
First Aid Guide – 1
Medical Exam Gloves – 2 pair
Sterile Pad (3”x 3”) – 4
Triangular Bandage (40”x 40”x 56”) – 1

Recommended:
Oral Analgesic
Bandage Compress
Breathing Barrier
Burn Dressing
Cold Pack
Eye Covering
Eye/Skin Wash
Hand Sanitizer Roller Bandage
Appendix A

General Industry Safety Standards with First Aid or Medical Service
Requirements or References

Part 6. Fire Exits

R 408.10623 Employee emergency plans.
Rule 623(3)(e): Rescue and medical duties for those employees who are trained to perform them.

Part 50. Telecommunications

1910.268(b) General.
Paragraph 268(b)(3): Readily accessible, adequate, and appropriate first aid supplies.

1910.268(c) Training.
Paragraph 268(c)(2) and (3): Train and certify in procedures pertaining to emergency situations and first aid training, including instruction in artificial respiration.

1910.268(o) Underground lines.
Paragraph 268(o)(1)(ii): While working in a manhole, a person with basic first aid training shall be immediately available to render assistance if there is cause for believing that a safety hazard exists.
Paragraph 268(o)(3): While working in a manhole occupied jointly by an electric utility and a telecommunication utility, an employee with basic first aid training shall be available in the immediate vicinity to render emergency assistance as may be required. The employee . . . is not to be precluded from occasionally entering a manhole to provide assistance other than in an emergency.

Part 51. Logging

R 408.15114 Injuries, first aid, and first aid training.
Rule 5114(1): First aid kits are required at each worksite where trees are being cut, at each active landing, and on each employee transport vehicle.
Rule 5114(2): The number and content of first aid kits is reviewed and approved.
Rule 5114(3): The contents of each first aid kit are maintained in a serviceable condition.
Rule 5114(4): Not less than 1 employee at a jobsite is trained in Red Cross first aid or equivalent.
Rule 5114(5): Assure that each employee, including supervisors, receives or has received first aid and cardiopulmonary resuscitation (CPR) training.
Rule 5114(6): Each employee receives first aid training at least once every 3 years and CPR training at least annually.
Rule 5114(7): Assure that first aid and CPR training or certificate of training, or both, remain current.
Rule 5114(8): All training shall be conducted by a designated person.
Rule 5114(9): Training is presented in a manner that the employee is able to understand, and is appropriate in content.
Rule 5114(10): The contents and numbers of first aid kits shall be adequate for the size and operations being conducted.
Rule 5114(11): First aid and CPR training: methods, length, and demonstrable ability.
Rule 5114(12): Minimum content of first aid and CPR training.

**Part 63. Pulp and Paper**

R 408.16321 Illumination.
Rule 6321(3): Provide emergency lighting in all plant first aid and medical facilities.

**Part 74. Fire Fighting**

R 408.17411 Duties of employer.
Rule 7411(1)(d): Develop procedures for the treatment and transport of injured employees from the emergency scene to a medical facility.
Rule 7411(1)(e): Provide first aid supplies/kits appropriate for the hazard history.

**Part 77. Grain Handling Facilities**

R 408.17704 Employee emergency plan and fire prevention plan.
Rule 7704(2)(d): Procedures to be followed by employees performing rescue or medical duties.

**Part 86. Electric Power Generation, Transmission, and Distribution**

1910.269(b) Medical services and first aid.
Paragraph 269(b): Provide medical services and first aid as required in 1910.151. In addition:

1910.269(b)(1) CPR and first aid.
Paragraph 269(b)(1)(i) and (ii): Persons trained in CPR and first aid training shall be available for field work and for fixed work locations such as substations.
Paragraph 269(b)(2): First aid supplies shall be in weatherproof containers if exposed to the weather.
Paragraph 269(b)(3): Maintain, inspect, and replenish first aid kits and make them readily available for use.

1910.269(e) Enclosed spaces.
Paragraph 269(e)(7): While work is being performed in the enclosed space, a person with first aid training shall be immediately available outside the enclosed space.

1910.269(t) Underground electrical installations.
Paragraph 269(t)(3)(i): While work is being performed in a manhole or vault containing energized electric equipment, an employee with first aid and CPR training shall be available on the surface to render emergency assistance.

**Part 90. Permit-Required Confined Spaces**

1910.146(k) Rescue and emergency services.
Paragraph 146(k)(2)(iii): Employees designated to provide permit space rescue and emergency services shall be trained in basic first-aid and CPR with current certification.

**Part 92. Hazard Communication**

1910.1200(g) Safety data sheets.
Paragraph 1200(g)(2)(iv): Safety data sheets shall include first-aid measures.
1910.1200(i) Trade secrets.

Paragraph 1200(i)(2): Where a medical emergency exists, the chemical manufacturer, importer, or employer shall immediately disclose the specific chemical identity of a trade secret chemical to that treating physician or nurse, regardless of the existence of a written statement of need or a confidentiality agreement.

Paragraph 1200(i)(3)(ii)(D): In non-emergency situations, a chemical manufacturer, importer, or employer shall, upon request, disclose a specific chemical identity to a health professional providing medical or other occupational health services to exposed employee(s), and to employees or designated representatives, if needed to provide medical treatment to exposed employees.
Appendix B

Occupational Health Standards with First Aid or Medical Services
Requirements or References

GI = General Industry
C = Construction
AO = Agricultural Operations

**Part 306. Formaldehyde** (GI & C)

R 325.51468 Medical examinations.

Rule 18(2): Provide medical examinations as soon as possible to employees exposed to formaldehyde in an emergency.

**Part 350. Carcinogens** (GI)

R 325.35009 Training and indoctrination.

Rule 9 (1)(h): An employer shall ensure that each authorized employee, before entering a regulated area and annually, receives training that includes, but is not limited to the purpose and application of specific first aid procedures and practices.

**Part 430. Hazard Communication** (GI & C)

1910.1200(g) Safety data sheets.

Paragraph 1200(g)(2)(iv): Safety data sheets shall include first-aid measures.

1910.1200(i) Trade secrets.

Paragraph 1200(i)(2): Where a medical emergency exists, the chemical manufacturer, importer, or employer shall immediately disclose the specific chemical identity of a trade secret chemical to that treating physician or nurse, regardless of the existence of a written statement of need or a confidentiality agreement.

Paragraph 1200(i)(3)(ii)(D): In non-emergency situations, a chemical manufacturer, importer, or employer shall, upon request, disclose a specific chemical identity to a health professional providing medical or other occupational health services to exposed employee(s), and to employees or designated representatives, if to provide medical treatment to exposed employees.

**Part 432. Hazardous Waste Operations and Emergency Response** (GI & C)

R 325.52125 Emergency operations at hazardous waste sites.

Rule 25(2)(h): The emergency response plan shall address emergency medical treatment and first aid.

R 325.52126 Illumination of work area.

Rule 26(2): Table 1 specifies minimum illumination requirements for first aid stations and infirmaries.

R 325.52129 Operations at treatment, storage, and disposal facilities.

Rule 29(9)(c)(viii): The emergency response plan shall address emergency medical treatment and first aid.
R 325.52130 Emergency response to hazardous substances releases; emergency response plan.

Rule 30(4)(h): The emergency response plan shall address emergency medical treatment and first aid.

Part 474. Sanitation (GI)

R325.47410 Water supply.

Rule 47410(1): The employer shall ensure that potable water is provided in all places of employment, for drinking, washing of the person, cooking, washing of foods, washing of cooking or eating utensils, washing of food preparation or processing premises, and personal service rooms (including first aid and medical services).
Rule 47411(1): The employer shall ensure that outlets for nonpotable water, such as water for industrial or firefighting purposes, are posted or otherwise marked in a manner that will indicate clearly that the water is unsafe and is not to be used for drinking, washing of the person, cooking, washing of food, washing of cooking or eating utensils, washing of food preparation or processing premises, or personal service rooms (including first aid and medical services), or for washing clothes.

R325.47911 Nonpotable water.

Rule 47411(3): Nonpotable water may not be used to clean personal service rooms (including first aid and medical services).

Part 490. Permit-Required Confined Spaces (GI)

1910.146(k) Rescue and emergency services.

Paragraph 146(k)(2)(iii): Employees designated to provide permit space rescue and emergency services shall be trained in basic first-aid and CPR with current certification.

Part 504. Diving Operations (GI & C)

1910.410(a) General.

Paragraph 410(a)(3): All dive team members shall be trained in cardiopulmonary resuscitation and first aid (American Red Cross standard course or equivalent).

1910.421(c) First aid supplies.

Paragraph 421(c)(1): A first aid kit appropriate for the diving operation and approved by a physician shall be available at the dive location.
Paragraph 421(c)(2): When used in a decompression chamber or bell, the first aid kit shall be suitable for use under hyperbaric conditions.
Paragraph 421(c)(3): In addition to any other first aid supplies, an American Red Cross standard first aid handbook or equivalent, and a bag-type manual resuscitator with transparent mask and tubing shall be available at the dive location.
Appendix C Alternative Conditions Under § 1910.401(A)(3) for Recreational Diving Instructors and Diving Guides (Mandatory).
Paragraph 8(c)(i): Before each day’s diving operations, the employer must ensure that at least two attendants, either employees or non-employees, qualified in first-aid and administering O2 treatment, are available at the dive site to treat diving-related medical emergencies; and
(ii): Verify their qualifications for this task.
Part 511. Temporary Labor Camps (GI & AO)
R 325.51141 First aid.
    Rule 11(1): Adequate first aid facilities approved by a health authority shall be maintained and made available in every labor camp for the emergency treatment of injured persons.
    Rule 11(2): Facilities shall be in charge of a person trained to administer first aid and shall be readily accessible for use at all times.

Part 526. Dipping And Coating Operations (GI)
1910.124 General requirements for dipping and coating operations.
    Paragraph 124(f): What first aid procedures must my employees know? First aid procedures that are appropriate for the hazards.
    Paragraph 124(h): What treatment and first aid must I provide? When your employees work with liquids that may burn, irritate, or otherwise harm their skin, you must provide:
        Paragraph 124(h)(2): Treatment by a properly designated person of any small skin abrasion, cut, rash, or open sore.
        Paragraph 124(h)(3): Appropriate first aid supplies located near the dipping and coating operation.

Part 529. Welding, Cutting, And Brazing (GI)
R325.52927 First-aid equipment.
    Rule 27: First-aid equipment shall be available at all times. All injuries shall be reported as soon as possible for medical attention. First-aid shall be rendered until medical attention can be provided.
Appendix C

Construction Safety Standards that have First Aid or Medical Service Requirements or References

Part 1. General Rules

R 408.40132 Medical services and first aid.
  Rule 132(1): Medical personnel availability.
  Rule 132(2): Prompt medical attention.
  Rule 132(3): First aid certification.
  Rule 132(4): Written plan requirements, remote locations, or single employee worksite.
  Rule 132(7): Transport of injured person and communication requirements.

R 408.40133 Illumination.
  Rule 133(3): Illumination intensity of 50 footcandles shall be provided for first aid stations and infirmaries.

Part 13. Mobile Equipment

1926.604 Site clearing.
  Paragraph 604(a)(1): General requirements. Employees engaged in site clearing shall be protected from hazards of irritant and toxic plants and suitably instructed in the first aid treatment available.

1926.605 Marine operations and equipment.
  Paragraph 605(d)(2): First-aid and lifesaving equipment. The employer shall ensure that there is in the vicinity of each barge in use at least one U.S. Coast Guard-approved 30-inch lifering with not less than 90 feet of line attached, and at least one portable or permanent ladder which will reach the top of the apron to the surface of the water. If the above equipment is not available at the pier, the employer shall furnish it during the time that he is working the barge.
  Paragraph 605(d)(3): First-aid and lifesaving equipment. Employees walking or working on the unguarded decks of barges shall be protected with U.S. Coast Guard-approved work vests or buoyant vests.

Part 14. Tunnels, Shafts, Caissons, and Cofferdams

R 408.41463 Emergency provisions; plans; equipment; rescue crews.
  Rule 1463(10)(h): The employer shall provide the following minimum rescue equipment at the top of a shaft: One first aid kit as prescribed in Construction Safety Standard Part 1 “General Rules,” as referenced in R 408.41410.

Part 42. Hazard Communication

1910.1200(g) Safety data sheets.
  Paragraph 1200(g)(2)(iv): Safety data sheets shall include first-aid measures.
1910.1200(i) Trade secrets.
Paragraph 1200(i)(2): Where a medical emergency exists, the chemical manufacturer, importer, or employer shall immediately disclose the specific chemical identity of a trade secret chemical to that treating physician or nurse, regardless of the existence of a written statement of need or a confidentiality agreement.
Paragraph 1200(i)(3)(ii)(D): In non-emergency situations, a chemical manufacturer, importer, or employer shall, upon request, disclose a specific chemical identity to a health professional providing medical or other occupational health services to exposed employee(s), and to employees or designated representatives, if to provide medical treatment to exposed employees.

Part 665. Underground Construction Caissons, Cofferdams and Compressed Air
1926.803 Compressed air.
Paragraph 803(b): Medical attendance, examination, and regulations.
Paragraph 803(b)(1): There shall be retained one or more licensed physicians familiar with and experienced in the physical requirements and the medical aspects of compressed air work and the treatment of decompression illness. He shall be available at all times while work is in progress in order to provide medical supervision of employees employed in compressed air work. He shall himself be physically qualified and be willing to enter a pressurized environment.
Paragraph 803(b)(7): A fully equipped first aid station shall be provided at each tunnel project regardless of the number of persons employed. An ambulance or transportation suitable for a litter case shall be at each project.
Paragraph 803(b)(8): Where tunnels are being excavated from portals more than 5 road miles apart, a first aid station and transportation facilities shall be provided at each portal.