

CAL/OSHA Requirements for Veterinary Practices

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Il 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, continual employee training, documentation and record keeping, as well as certain workplace postings. No two safety programs or written plans will be exactly the same, 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 written program must include the following components:

- **Responsibility**—the employer's written IIPP must provide the name and/or job title of the person(s) with the authority and responsibility for its implementation
- Compliance—a system must be set forth in writing 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 or illnesses
- Hazard correction—methods and procedures for correcting all existing workplace hazards and unsafe or unhealthful work conditions or work 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—there must be 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 components of an IIPP will be necessary. Below are other required sections:

- Hazard Communication Program (HCP)
- Fire Prevention Plan
- Emergency Action Plan
- Heat Illness Prevention Program (only applicable to businesses with outdoor workers)
- Log 300 records and Log 300A posting if applicable (businesses with 10 or fewer employees are exempt from both requirements)
- Zoonotic Disease Control Program
- Hearing Conservation Program
- COVID-19 Protection Program
- Wildfire Smoke Inhalation Protection (for situations in which practice employees are exposed to prolonged smoke)
- Anesthetic Gas Monitoring Program
- Emergency eyewash and shower stations

Workplace 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 a few. The notices must be posted in an area frequented by employees where they may be easily read during the workday.

All Cal/OSHA required postings are included in the CVMA Employee Poster set, available for purchase in the CVMA online store at cvma.net by clicking "Products" under the Resources tab at the top of the homepage.

For more information about complying with Cal/OSHA workplace requirements in veterinary practices, visit cvma-inline.net and click "Practice Safety."

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