

Help! OSHA Is Here!

How to Avoid OSHA Violations and Infection Control Infractions

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“There’s not enough time in the day!” Does this echo your sentiment at work? You serve patients, clean and disinfect treatment rooms, sterilize instruments, order supplies, return phone calls ... and the day is done. Now, an OSHA inspector arrives unexpectedly.

You have a gut-wrenching feeling, knowing you haven’t had time to work on your OSHA paperwork. You can’t remember the last time you touched it. What happens next?

OSHA’s Safety and Health Officer will present their credentials prior to initiating the on-site inspection. The inspector will indicate the reason for their visit, which could be due to a complaint or random selection, or it could be because your industry is subject to targeted inspections in your state. The officer will conduct a walkthrough of the dental practice, looking for hazards, and will review required safety plans and employee injury reports. The officer will also interview employees.¹

During the closing conference, the officer will discuss their findings with the employer. OSHA may issue citations and fines for violations of standards such as the Bloodborne Pathogens Standard, the Hazard Communication Standard, and others that are pertinent to a dental office setting.

How do you prevent a visit from a compliance officer from being a stressful experience? Prepare ahead of time.

Where Do I Start?

Designate a safety coordinator. This individual will be the go-to person to spearhead training, policy development, and onboarding of new hires as they relate to safety management. The safety officer is encouraged to pursue additional training on how to manage the compliance program; consider membership in the Association of Dental Safety (ADS).²

What Are the Common OSHA Violations in a Dental Office Setting?

Know what violations are commonly found in dental settings. After all, knowing these pitfalls will help you avoid stepping into them. Here are some of the ones we see most often.

Documentation

Let’s face it: Keeping up with paperwork is typically not among our favorite tasks, but here is some paperwork you don’t want to fall behind on.

- Ensure that your Exposure Control Plan is current for the year and includes post-exposure management protocols.
- Review the Hazard Communication Plan, and verify that your Safety Data Sheets (SDSs) are current with a corresponding inventory.
- Maintain a written Emergency Action Plan and Fire Prevention Plan, if you have 10 or more employees.
- Display the OSHA poster and other required signage and communication, such as chemical ID labels (pictograms) and biohazard labels. Yes — even a no-smoking sign is required where employees congregate, such as the employee breakroom.

Recordkeeping

Maintain confidential and accurate records of employees’ sharps injuries and their hepatitis B vaccination status. Training records containing attendee signatures, designations, and presenter credentials should be maintained to demonstrate compliance.

PPE

Everyone is likely familiar with personal protective equipment (PPE), but are they wearing it correctly? PPE is selected based on the degree of anticipated exposure. For most patient dental procedures, this includes wearing gloves, a mask, protective eyewear, and protective clothing (such as a lab jacket or gown). And, of course, ensure that eyewear meets the ANSI/ISEA Z87.1 standard.

Let’s not overlook the selection of appropriate PPE for treatment room clean-up and instrument management.

- Check the disinfectant product’s label for recommended PPE. One dental office was cited due to the dental assistant not wearing eye protection during the disinfection process, despite the product label clearly stating such protection was advised.
- Wear utility gloves when handling loose, contaminated sharps. Don’t forget to decontaminate the utility gloves between uses.
- Launder cloth jackets at work, or utilize a laundry service. Employees may never take cloth lab jackets home. Ensure that all PPE is donned and doffed correctly.³

Training

Provide training on the Bloodborne Pathogens Standard at least every 365 days. This training should include infection control and prevention topics. It is helpful to calendar the training session to ensure you meet the annual requirement. Ensure that new hires with the potential for occupational exposure to blood or other potentially infectious material are provided with training and offered the hepatitis B vaccination.

How Do I Make Time for This Project?

Allocate time. Talk to your employer about reserving time in your schedule to complete the task. It takes time to train your workforce. It takes time to complete safety plans and keep them updated. It takes time to train new hires. It takes time to gather SDSs and update the chemical inventory. Build it into your schedule just like you would a patient appointment.

Once I’m Finished With the Program, What Else Do I Have to Do?

It’s not simply about checking the box. It’s about demonstrating compliance.

Keep your compliance program up to date. Certain tasks must be completed annually, including:

- Updating your Exposure Control Plan
- Evaluating safer medical devices
- Updating chemical inventory
- Training
- Reviewing all safety plans for accuracy

Know how to navigate your compliance materials, whether paper or electronic. For example, if the compliance officer asks for the current Exposure Control Plan, be ready to produce it.

Preparing ahead of time will give you the confidence you need to greet a compliance officer with a smile. Your team will be prepared and ready to showcase their proper PPE and answer questions with confidence.

Rather than saying, “Oh no! OSHA is here!” you’ll respond, “Great! Let me get my paperwork for them.”

References

¹ <https://www.osha.gov/sites/default/files/publications/factsheet-inspections.pdf>, accessed on July 2, 2025

² <https://www.myads.org/>, accessed on July 2, 2025

³ <https://www.cdc.gov/niosh/learning/safetyculturehc/module-3/8.html> , accessed on July 2, 2025

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A leader in her field, Olivia is active in professional organizations such as the Tennessee and Kentucky Bar Associations and American Dental Safety , and she has served as president of the Stewart County Chamber of Commerce. She is a contributing author to several American Dental Association publications and is recognized as a national speaker and instructor on topics including legal risk management, OSHA, HIPAA, and human resources.

Olivia resides in Tennessee on Dogwood Springs Farm, where she enjoys her love of horses and farm critters.