

OSH INFORMATION MEMORANDUM 94 X 95

TO: OSH Compliance Staff

FROM: W. M. Lybrand

DATE: September 23, 1994

SUBJECT: Requirement to Have Personnel Trained to Render First Aid

The purpose of this memorandum is to provide clarification as to when the employer must have personnel at the work site trained to administer first aid. (Re: SCDOL vs Food Lion).

A. Where Required by a Specific Standard.

The following standards require personnel to be trained:

1. Electric Power Generation, Transmission, and Distribution. – 1910.269(b)(1), 1910.269(t)(3)(i).
2. Temporary Labor Camps – 1910.142(k)(2)
3. Permit-required Confined Spaces – 1910.146(k)(1)(iv)
4. Commercial Diving Operations – 1910.410(a)(3); 1926.1076(a)(3).
5. Telecommunications – 1910.268(c)(3)
6. Compressed Air – 1926.803(b)(7)
7. Welding, Cutting and Brazing – 1910.252(c)(13).

NOTE: Under the power transmission and distribution standard – the employer may comply with 1926.50(c) in lieu of 1926.950(e)(1).

B. Where Required by a General Standard.

These standards, 1910.151(b) or 1926.50(c), are applicable when there is a likelihood of a life-threatening injury.

An injury is life-threatening if it could result in cardiac arrest, respiratory arrest, or severe bleeding.

When there is a likelihood of a life-threatening injury, the employer must have personnel at the work site trained to administer first aid unless treatment can be provided within 3-4 minutes by a qualified medical facility or responder.

A doctor's office is an acceptable medical facility if their business hours correspond to the employers.

Also, a fire-ambulance unit which responds to 911 emergency calls may be acceptable.

C. Documentation Support.

Documentation to support violations of 1910.151(b) and/or 1926.50(c) should include: location of work site (urban or rural), number of shifts, nature of work done, equipment, travel distance and time (consider traffic and weather), establishments' injury record, fatalities and/or life-threatening accidents which have occurred in similar industries, severity of cited hazards.

D. Citation Policy.

Although each case must stand on its own merits, violations of 1910.151(b) and 1926.50(c) will only be cited when there is a likelihood of a life-threatening injury. Normally, these violations will be classified as serious.

E. Definitions.

1. First aid is emergency treatment administered to an injured or sick person before professional medical care is available.
2. Accident is an unexpected event caused by either unsafe acts or unsafe conditions
3. The American Red Cross Standard First Aid Manual states that an emergency is life-threatening if the victim is unconscious, is not breathing, is breathing with difficulty, has no pulse, or is bleeding severely.

F. Recommendation.

Because accidents are the leading cause of death in the United States, the National Safety Council and the Red Cross suggest that everyone should know first aid.

Injuries which are not life-threatening still require appropriate first aid to prevent further injury, infection, etc., therefore, Compliance personnel should recommend that all employers evaluate their work place conditions, MSDS, business location, etc., and consider first aid training.