

Setting Up Your Employee Health Program

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Every ASC must have a comprehensive Employee Health Program that addresses pre-employment requirements and policies and procedures intended to protect its employees and patients.

In an effort to promote and enhance a safe and healthy environment for employees and to protect patients from exposure to communicable disease, every Ambulatory Surgery Center (ASC) must have an Employee Health Program. This is a requirement of OSHA, CMS, state licensure, and most accrediting agencies. A qualified employee, typically the clinical director, is designated to oversee the program and to update, communicate, and maintain employee health information consistent with OSHA; federal, state, and local regulations; and with facility policy. A good record-keeping system is necessary to maintain health information data on new hires and current employees. The employee health file should be in secure storage separate from the personnel records.

Specific requirements

All employees should be free of infectious diseases and fit for duty. Policies and procedures related to your Employee Health Program should reflect these requirements:

- Pre-employment health screening conducted on new employees to include but not limited to
 - » Physical examination
 - » Health history completed by the employee
 - » TB screening (All employees should be screened for the presence of inactive or active TB at the time of employment and at least annually thereafter. Two-step TB protocol is used for all new employees.)
 - Documentation of HBV vaccination or declination
- The CDC is also recommending the following vaccinations to healthcare personnel:
- » MMR
 - » Varicella (chickenpox)
 - » Tetanus, diphtheria, pertussis
 - » Influenza (annually)
- Ongoing employee health services: Employees should have a clear understanding of the facility's policy/procedure for returning to work following an illness or injury. Generally, employees who are absent from work for more than 3 scheduled working days will be required to submit evidence of physical ability to return to duty. This documentation is usually a written release from a physician and should be kept in the employee's file.
 - Exposure to infectious disease/hazardous exposures/blood or body fluid exposure
 - » Exposure to blood or body fluids/substances is a serious occupational hazard. Immediate reporting of these events for appropriate risk assessment, counseling, and initiation of post-exposure prophylaxis (PEP) should be included in policies and procedures.
 - » The Employee Health Program should include an Exposure Control Plan. This is a written plan for all employees who could reasonably come into contact with blood and other potentially infectious materials (OPIM) as a result of performing their job duties and must comply with OSHA blood-borne pathogen standards.
- » An Exposure Determination Plan should also be included in your program. This plan classifies employees who might or might not have the likelihood of occupational exposure to blood or OPIM. The job classifications should be reviewed and updated at least annually and whenever necessary to reflect new or modified tasks and procedures that affect occupational exposure and new or revised employee positions.
 - » All employees should be evaluated for immunity to specified communicable diseases and history of immunizations. They should also undergo periodic screening and be evaluated for exposure management for specified communicable diseases.
- Occupational-related injuries and illnesses
 - » It is the employer's responsibility to have an effective safety program that complies with OSHA regulations and to ensure employee compliance.
 - » Employees can play an important role in correcting unhealthy conditions by communicating observations and concerns and should understand there are no reprisals for bringing safety-related matters to the attention of the supervisor.



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Specific requirements for Medicare-certified ASCs

Medicare-certified ASCs must begin reporting influenza vaccination coverage among healthcare workers for the period beginning October 2014. Facilities with a well-defined and well-implemented Employee Health Program will be best positioned to adhere to this new mandate.

Communication protocols

Every ASC must have a comprehensive Employee Health Program that addresses pre-employment requirements and policies and procedures intended to protect its employees and patients. The surgery center should communicate with employees regarding occupational health and safety policies, procedures, and directives through job descriptions, orientation, in-service training, annual OSHA training, and staff meetings to discuss health and safety issues. **AE**



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