



SAFETY DIRECTOR BULLETIN



FIRST AID & FIRST AID KITS IN THE WORKPLACE BEST PRACTICES

This bulletin will assist public employers in determining their first aid and first aid kits requirements.

[OSHA 1910.151 Medical Services and First Aid](#), paragraph (b) says, "in the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available." Public employers should consider three references to determine whether they are meeting the standard:

- [OSHA Letters of Interpretation](#)
- [OSHA Non-Mandatory Appendix to 1910.151 First Aid Kits](#)
- The current edition of ANSI/ Z308.1 *Minimum Requirements for Workplace First-Aid Kits*

About 30 Letters of Interpretation on 1910.151 discuss near proximity, local first aid squads, first aid training, and first aid kits.

- 'Near Proximity' is [interpreted by OSHA](#) as emergency care must be available within no more than 3 - 4 minutes in workplaces where serious accidents such as falls, suffocation, electrocution, or amputation/uncontrolled life-threatening bleeding are possible. OSHA recognizes that in workplaces, such as offices, where the possibility of such work-related severe injuries is less likely, a longer response time of up to 15 minutes may be reasonable.

Departments that use extension ladders, bucket trucks, chainsaws, or that work with electricity or in confined spaces should conduct a risk assessment to determine:

- Whether their local police, fire, or EMS departments can reliably arrive at any site where employees could be working within 3 - 4 minutes, AND
- Are appropriately equipped and trained to handle life-threatening injuries.

If not, the employer must train and equip one or more employees to render immediate first aid.

- Some OSHA standards, for example, *Logging Operations* (29 CFR 1910.266), *Permit-Required Confined Spaces* (29 CFR 1910.146), and *Electric Power Generation, Transmission, and Distribution* (29 CFR 1910.269) have [specific requirements that employees be trained in first aid and CPR](#). If an employer is covered by one of these standards, they are not permitted to rely on outside emergency responders, and employee training would be required.
- [OSHA recognizes any nationally accepted](#) and medically sound first aid training program that covers the fundamentals of first aid as meeting the requirements stated in 29 CFR 1910.151. However, [OSHA does not certify first aid training programs](#). It is the responsibility of the employer to make an assessment of the work area and all first aid needs for expected injuries and illnesses. Each employer using any first aid course must satisfy him/herself that the course adequately covers the type of injuries/illnesses likely to be encountered in the workplace.

[OSHA recommends that CPR training](#) be an element of a first aid program. Employees should be certified annually to perform CPR, and first aid training should occur at least once every three years.

- OSHA says [online training alone](#) does not fulfill the training requirement for employees who must be trained to comply with the 1910.151 Standard.

First Aid Kits and Supplies

Appendix A states, "An example of the minimal contents of a generic first aid kit is described in American National Standard (ANSI) Z308.1-1998 *Minimum Requirements for Workplace First-aid Kits*." While Appendix A is non-mandatory, Appendix A and ANSI Z308.1 should be considered industry standards. Courts generally deem industry standards as a requirement on the employer unless the employer can enumerate why they did not, or could not, follow the guideline.

ANSI Z308.1 was recently updated with an effective date of October 15, 2022. The 2021 edition retains the Class A or Class B kit classifications for stationary locations. Class A kits generally are suitable for all wounds, minor burns, and eye injuries. Class B kits are intended for densely populated workplaces with complex and/or high-risk environments, such as warehouses, factories, and outdoor areas.

There are some noteworthy updates in ANSI Z308.1-2021:

- **A foil blanket is now mandatory** in recognition of the multiple purposes that the item can serve, such as treating hypothermia, acting as a windbreaker, or being worn as an emergency waterproof wrap.
- **Distinguish blood control tourniquets** from bands used to draw blood.
- **Greater guidance on bleeding control kits** to provide details on bleeding control kits, which contain more advanced first-aid supplies to immediately treat life-threatening external bleeding.

The new recommended basic contents are:

Item	Description	Minimum Quantities	
		Class A Kit	Class B Kit
Adhesive Bandage	1" x 3"	16	50
Sterile Pad (gauze)	3" x 3"	2	4
Trauma Pad	5" x 9"	2	4
Roller Bandage (gauze)	2" x 4 yds.	1	2
Roller Bandage (gauze)	4" x 4 yds.	0	1
Eye Covering	2.9 sq. in.	2	2
Adhesive Tape	2.5 yds.	1	2
Triangular Bandage	40" x 40" x 56"	1	2
Tourniquet	1.5" Wide	0	1
Splint	4" x 24"	0	1
Burn Dressing (gel-soaked)	4" x 4"	1	2
Burn Treatment	1/32 oz.	10	25
Cold Pack	4" x 5"	1	2
Antiseptic	1/57 oz.	10	50
Antibiotic Application	1/57 oz.	10	25
Eye/Skin Wash	Total fluid ounces	1	4
Medical Exam Gloves	Pair	2	4
Hand Sanitizer	1/32 fl. oz.	10	20
First Aid Guide		1	1
Scissors		1	1
Breathing Barrier		1	1
Foil Blanket	52" x 84"	1	1

While the OSHA Permit-Required Confined Space standard (29 CFR 1910.146) requires "basic first aid and CPR" training which now often includes automated external defibrillation (AED) training, [there is no requirement to provide AEDs](#). However, New Jersey requires AEDs in specific workplaces such as health clubs, airports, and nursing homes, please review the [MSI SD Bulletin AED Programs](#) for addition information.

Appendix A continues by saying, "employers should determine the need for additional first aid kits at the worksite, additional types of first aid equipment and supplies, and additional quantities and types of supplies and equipment in the first aid kits." The intent is for employers to consider if their injury potential indicates a need for specific first aid equipment, perhaps heat packs for hypothermia treatment, or if more than one of an item is needed. Looking at the list, it is easy to see many of the trauma supplies presume a single injured employee at a time. If an incident in the workplace could potentially affect two or three employees, the employer should consider doubling or tripling the number of items on the ANSI list.

It is also important to remember that OSHA primarily targets industrial settings when creating its standards. Many departments in the public sector work outside a single workplace. They work all around the town, county, or region. Employers should also consider if first kits in work vehicles are indicated. As with the stationary workplace, employers should consider what first aid equipment or supplies are needed and in what quantities. For example, include equipment and supplies to control severe bleeding with chainsaws and chainsaw personal protective equipment bags.

Lastly, employers should consider their people. Did the employer hire and create a culture where employees will help another person in need? If so, the employer should ensure that employees are prepared to assist and give them the best chance at success. Also, statistically, the employee is more likely to use first aid within their own family. The bond created is more valuable than the cost of a bit of training time.