
MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)
Department of Labor and Economic Opportunity (LEO)

AGENCY INSTRUCTION

DOCUMENT IDENTIFIER:

MIOSHA-STD-08-3R6

DATE:

October 14, 2024

SUBJECT: Medical Services and First Aid for General Industry and Construction

- I. Purpose. This instruction establishes policies and provides clarifications to ensure uniform enforcement and interpretation of MIOSHA standards requiring medical services and first aid.
- II. Scope. This instruction applies agency-wide.
- III. References.
 - A. American National Standards Institute (ANSI)/International Safety Equipment Association (ISEA) Z308.1-2015 Minimum Requirements for Workplace First Aid Kits and Supplies.
 - B. Construction Standard [Part 1, General Rules](#).
 - C. General Industry Standard [Part 472, Medical Services and First Aid](#).
 - D. General Industry Standard [Part 554, Bloodborne Infectious Diseases](#).
 - E. Michigan Department of Labor and Economic Opportunity (LEO) Michigan Occupational Safety and Health Administration (MIOSHA), Consultation Education and Training (CET) Division, Publication #5230 – [Bloodborne Infectious Diseases Sample Exposure Control Plan \(Limited Exposure\)](#) (CET publication MIOSHA-CET-5230).
 - F. [Michigan Occupational Safety and Health Act](#), MCL 408.1001 et. seq., P.A. 154 of 1974, as amended (MIOSH Act).
 - G. MIOSHA-300 Log of Work Related Injuries and Illnesses.
 - H. [MIOSHA Field Operations Manual](#), as amended (FOM).
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.
- V. Cancellation. All previous versions of this agency instruction.
- VI. Next Review Date. To be reviewed three (3) years from date of issuance.
- VII. History: History of previous versions include:
 - MIOSHA-STD-08-3R5, December 2, 2020
 - MIOSHA-STD-08-3R4, June 2, 2020
 - MIOSHA-STD-08-3R3, October 13, 2016
 - MIOSHA-STD-08-3R2, January 17, 2012
 - MIOSHA-STD-08-3R1, December 3, 2008
 - MIOSHA-STD-08-3, October 1, 2008
- VIII. Contact. [Barton G. Pickelman](#), Director

IX. Originator. Barton G. Pickelman, Director

X. Significant Changes.

- A. Updated guidance on when medical services and first aid violations may be recommended as serious. See XIII. Citation Guidelines. Section A.2.
- B. Updated guidance on when medical services and first aid violations may be issued as Other-Than-Serious. See XIII. Citation Guidelines. Section B.
- C. Updated guidance on violation grouping for medical services and first aid violations. See Section XIII. Citations Guidelines. Section C.
- D. Removed “occupational” from several sections.
- E. Deleted the rule subpart references and rule language from the standards listed in the appendices.

XI. General Industry Requirements.

A. General Industry Standard Part 472, Medical Services and First Aid.

- 1. The employer shall ensure the ready availability of medical personnel for advice and consultation on matters of plant health. [Part 472. Rule 325.47201(1)].
 - a) The necessity for consultation is determined by the types of hazards (chemical, physical) found in the workplace and an ongoing analysis of the employer’s MIOSHA-300 (Log of Work-Related Injuries and Illnesses), workers’ compensation data, and workplace safety and health surveys.
 - b) To meet the Michigan health standard requirements, first aid care shall be readily available to employees during all working hours. However, this standard does not necessarily require first aid facilities in all places of employment.
- 2. In the absence of an infirmary, clinic, or hospital in near proximity to the workplace, an employer shall ensure the ready availability of a person or persons who are adequately trained to render first aid. To determine “near proximity,” MIOSHA will consider the following:
 - a) In areas where serious accidents may occur such as those involving falls, electric shock, amputations, or severe chemical exposures that could result in suffocation, severe bleeding, or other life-threatening injury or illness, a maximum three-to four-minute response time is required.
 - b) In other circumstances where a life-threatening injury is unlikely (e.g., low hazard workplaces such as offices), a maximum 15-minute response time is acceptable.
- 3. Where a remote location or a single employee worksite exists, an employer shall develop and implement a written plan that provides for and

assures the prompt medical treatment of employees working at such locations. Methods for assuring prompt medical attention in the event of an emergency may include, but are not limited to the following:

- a) Provide employee(s) with a means of communication such as a cell phone, two-way radio, or panic button alert system that could be activated to summon emergency services.
- b) Implement a wellness verification procedure where the employee would periodically check in with a centrally staffed location on a set schedule.
- c) Install a video monitoring system.
- d) Train exposed and responding employees on the exact procedure to execute in the event of an injury.

4. An employer shall ensure that there are first aid supplies readily available.
 - a) Consideration shall be given to the following when selecting the contents, number, and placement of first aid kits at a worksite: the size of the worksite, the type of work, the number of employees, and past experience.
 - b) A first aid kit that contains items appropriate for the worksite will be considered in compliance with the rule.

B. Other General Industry Standards with Medical Services or First Aid Requirements. See [Appendix A](#) for general industry safety standards and [Appendix B](#) for health standards with medical services or first aid requirements or references.

XII. Construction Requirements.

A. Construction Standard Part 1, General Rules.

1. An employer shall ensure the availability of medical personnel for advice and consultation on matters of occupational health. The necessity for consultation is predicated by the types of hazards (chemical, physical) found in the workplace and through an ongoing analysis of the employer's MIOSHA-300 (Log of Work-Related Injuries and Illnesses), workers' compensation data, and worksite safety and health surveys.
2. A person who has a valid certificate in first aid training shall be present at the worksite to render first aid. A certificate is valid if the requirements necessary to obtain the certificate for first aid training meet or exceed the requirements of the United States Bureau of Mines, the American Red Cross, or an equivalent training program that can be verified by documented evidence.
3. Although cardiopulmonary resuscitation (CPR) training is not a requirement, MIOSHA encourages employers to provide CPR training

along with first aid training. A good share of construction accidents are not addressed in the basic first aid courses. A victim of an electric shock whose breathing and/or heart has stopped must receive immediate assistance from a CPR trained person or death is imminent within three to four minutes. Other types of construction accidents, such as falls, drowning, and cave-ins may also require CPR. The safety officer/industrial hygienist (SO/IH) shall encourage employers to include CPR training along with any first aid training that may be provided.

4. Where a remote location or a single employee worksite exists, an employer shall develop and implement a written plan that provides for and assures the prompt medical treatment of employees working at such locations. The plan shall be communicated to all affected employees. This means the employer must have a written plan in place prior to initiating such projects. Methods for assuring prompt medical attention in the event of an emergency may include, but are not limited to:
 - a) Provide employee(s) with a means of communication such as a cell phone, two-way radio, or panic button alert system that could be activated to summon emergency services.
 - b) Implement a wellness verification procedure where the employee would periodically check in with a centrally staffed location on a set schedule.
 - c) Install a video monitoring system.
5. An employer shall ensure that there are first aid supplies at each jobsite and that the supplies are readily accessible.
 - a) Consideration shall be given to the following when selecting the contents, number, and placement of first aid kits at a worksite: the size of the jobsite, the type of work, the number of employees, and past experience.
 - b) A first aid kit that contains items appropriate for the worksite will be considered in compliance with the rule.
 - c) First aid kit supplies shall be sealed in individual packages, stored in a weatherproof container, and inspected by an employer or designated representative prior to being sent out on each job and at least weekly thereafter. Depleted supplies shall be promptly replaced.
6. Where serious accidents such as falls, electric shocks, amputations, or severe chemical exposures could result in suffocation, severe bleeding, or other life-threatening injuries or illnesses, the employer shall put measures in place to assure the prompt transport and medical treatment of injured personnel.

- a) The employer must also provide a communication system for contacting the necessary emergency service.
 - b) The telephone numbers of a physician, hospital, or emergency service shall be conspicuously posted at the jobsite.
- B. Other Construction Standards with Medical Services or First Aid Requirements. See [Appendix B](#) for health standards with medical services or first aid requirements or references, and [Appendix C](#) for other construction-related standards, with specific medical services or first aid requirements or references.

XIII. Citation Guidelines.

- A. Serious. The SO/IH shall consider a serious violation after evaluating the following:
- 1. When a SO/IH encounters a workplace containing hazards or exposures that could result in a life-threatening injury or illness, the employer has made no arrangements for first aid or medical treatment, and an incident has occurred, the SO/IH shall recommend a serious violation.
 - 2. When a SO/IH encounters a workplace containing hazards or exposures that could result in a life-threatening injury or illness, the employer has made no arrangements for first aid or medical treatment, and an incident has the potential to occur, the SO/IH shall recommend a serious violation. For example, if there is a serious hazard identified at the site, such as fall protection, struck-by, crushed, or electrocution hazard, and the employer has made no arrangements for first aid or medical treatment in the case of injury, this violation would be recommended as serious.
 - 3. The SO/IH may contact their supervisor prior to recommending a serious violation. Before contacting their supervisor, the SO/IH shall evaluate the employer's efforts regarding the following:
 - a) Identify and assess workplace risks that have potential to cause worker injury or illness.
 - b) Identify emergency medical services and availability for all times of the day when employees are working. Response times for treatment must be planned to take into consideration normally anticipated delays such as auto or train traffic. Plans for response time must be reevaluated when conditions change.
 - c) Designate available trained first aid providers and readily accessible location of first aid supplies.
 - d) Communicate and make readily accessible contact personnel and phone numbers. Ensure this information is current.
 - e) Instruct all workers about the first aid program, including what workers should do if a coworker is injured or ill.

- B. Other-than-serious. The SO/IH shall consider an other-than-serious violation only after evaluation of the following:
 - 1. A medical service or first aid violation has been determined, no incident has occurred, and there is no potential for a serious injury or illness to occur at the worksite based on the conditions identified at the site.
 - 2. There are extenuating circumstances that affect the employer's ability to comply (such as community-wide emergency conditions).
- C. Grouping.
 - 1. Violations may be grouped where there are violations of multiple rules/standards involving the same hazard (e.g., first aid requirements, bloodborne infectious diseases requirements, and/or recordkeeping requirements). Violations shall be grouped in accordance with the MIOSHA FOM.
 - 2. When two (2) or more individual violations are recommended which, if considered individually, represent other-than-serious violations, these violations may be grouped and issued as serious when there is a substantial probability of death or serious physical harm occurring because of the violative conditions.

XIV. Bloodborne Infectious Disease Program.

- A. Employees with assigned first aid duties in general industry are required to be protected by compliance with the MIOSHA bloodborne infectious disease standard.

The bloodborne infectious diseases standard **does not** apply to the construction and agriculture industries. For those industries that do not fall within the scope of the bloodborne infectious diseases standard, and a recognized hazard involving bloodborne infectious diseases has been identified, consideration shall be given to citing Section 11(a) of the MIOSH Act. Section 11(a) of the MIOSH Act (The General Duty Clause) provides that "an employer shall furnish to each employee, employment and a place of employment which is free from recognized hazards that are causing, or are likely to cause, death or serious physical harm to the employee." Section 11(a) citations must meet the requirements outlined in the MIOSHA FOM, Chapter VI. Failure to implement all or any part of R325.70001 et seq. can be used as the basis for a general duty citation in the construction and agricultural industries. However, R325.70001 et seq. should never be referenced in a general duty citation. The requirements of R325.70001 et seq. may be listed in a general duty citation.

- B. The employer must develop a written exposure control plan that covers:
 - exposure determination
 - universal precautions
 - engineering controls
 - regulated waste disposal
 - laundry
 - vaccination & post exposure follow-up

- work practices
- personal protective equipment
- housekeeping
- communication of hazards to employees
- recordkeeping
- training

CET publication MIOSHA-CET-5230 provides a model written program for those situations where employees are expected to have limited (e.g., first aid) exposures to potentially infectious materials.

- C. If first aid is a "collateral duty," for example a production employee who may, on occasion, be called upon to provide first aid as a trained first aid team member, the employer may postpone the hepatitis B vaccination until such time the employee performs first aid where blood or other potentially infectious materials are present.

- XV. Guidelines for First Aid Kits. ANSI /ISEA Z308.1-2015 Minimum Requirements for Workplace First Aid Kits and Supplies classifies first aid kits as “A” or “B” and requires one or the other based on how populated, high-risk, or complex a work environment is. The kits must contain minimum quantities of supplies within a Type I-IV container with an appropriate label. The ANSI standard is a consensus standard and viewed as guidance but not enforced by MIOSHA.

Classes of First Aid Kits and Required Supplies				
First Aid Supply	Minimum Quantity		Minimum Size or Volume	
	Class A Kits	Class B Kits	(US)	(metric)
Adhesive Bandage	16	50	1 x 3 in	2.5 x 7.5 cm
Adhesive Tape	1	2	2.5 yd (total)	2.3 m
Antibiotic Application	10	25	1/57 oz	0.5 g
Antiseptic	10	50	1/57 oz	0.5 g
Breathing Barrier	1	1		
Burn Dressing	1	2	4 x 4 in	10 x 10 cm
Burn Treatment	1	2	4 x 4 in	10 x 10 cm
Cold Pack	1	2	4 x 5 in	10 x 12.5 cm
Eye Covering, with means of attachment	2	2	2.9 sq in	19 sq cm
Eye/Skin Wash	1 fl oz	4 fl oz	-	29.6 ml / 118.3 ml
First Aid Guide	1	1		
Hand Sanitizer	6	10	1/32 oz	0.9 g

MIOSHA-STD-08-3R6

October 14, 2024

Medical Services and First Aid for General Industry and Construction

Medical Exam Gloves	2 pair	4 pair		
Roller Bandage 2 inch	1	2	2 in x 4 yd	5 cm x 3.66 m
Roller Bandage 4 inch	0	1	4 in x 4 yd	10 cm x 3.66 m
Scissors	1	1		
Splint	0	1	4 x 24 in	10.2 x 61 cm
Sterile Pad	2	4	3 x 3 in	7.5 x 7.5 cm
Tourniquet	0	1	1 in (width)	2.5 cm (width)
Trauma Pad	2	4	5 x 9 in	12.7 x 22.9 cm
Triangular Bandage	1	2	40 x 40 x 56 in	101 x 101 x 142 cm

Appendix A

General Industry Safety Standards with Medical Services and First Aid Requirements or References

Part 6, Fire Exits

R 408.10623 Employee emergency plans.

Part 50, Telecommunications

1910.268(b) General.

1910.268(c) Training.

1910.268(o) Underground lines.

Part 51, Logging

R 408.15114 Injuries, first aid, and first aid training.

Part 63, Pulp, Paper, and Paperboard Mills

R 408.16321 Illumination.

Part 74, Fire Fighting

R 408.17411 Duties of employer.

Part 77, Grain Handling Facilities

1910.272(d) Emergency action plan.

Part 86, Electric Power Generation, Transmission, and Distribution

1910.269(b) Medical services and first aid.

1910.269(e) Enclosed spaces.

1910.269(t) Underground electrical installations.

Part 90, Permit-Required Confined Spaces

1910.146(k) Rescue and emergency services.

Part 92, Hazard Communication

1910.1200(g) Safety data sheets.

1910.1200(i) Trade secrets.

Appendix B

Health Standards with Medical Services or First Aid Requirements or References

GI = General Industry

C = Construction

AO = Agricultural Operations

[Part 306, Formaldehyde](#) (GI & C)

1910.1048(l) Medical surveillance.

[Part 350, Carcinogens](#) (GI)

1910.1003(e)(4) Training and indoctrination.

[Part 430, Hazard Communication](#) (GI & C)

1910.1200(g) Safety data sheets.

1910.1200(i) Trade secrets.

[Part 432, Hazardous Waste Operations and Emergency Response](#) (GI & C)

1910.120(l)(2) Elements of an emergency response plan.

1910.120(m) Illumination.

1910.120(p)(8)(ii) Elements of an emergency response plan.

1910.120(q)(2) Elements of an emergency response plan.

1910.120 - Appendix E – Training Curriculum Guidelines – (Non-mandatory).

[Part 474, Sanitation](#) (GI)

1910.141(b)(1) Potable water.

1910.141(b)(2) Non-potable water.

[Part 490, Permit-Required Confined Spaces](#) (GI)

1910.146(k) Rescue and emergency services.

[Part 504, Diving Operations](#) (GI & C)

1910.410(a) General.

1910.421(c) First aid supplies.

Appendix C Alternative Conditions Under § 1910.401(A)(3) for Recreational Diving Instructors and Diving Guides (Mandatory).

[Part 511, Temporary Labor Camps](#) (GI & AO)

1910.142(k) “First aid.”

[Part 526, Dipping and Coating Operations](#) (GI)

1910.124 General requirements for dipping and coating operations.

MIOSHA-STD-08-3R6

October 14, 2024

Medical Services and First Aid for General Industry and Construction

Part 529, Welding, Cutting, and Brazing (GI)

1910.252(c)(13) First-aid equipment.

Part 665, Underground Construction Caissons, Cofferdams, and Compressed Air (C)

1926.803 Compressed air.

Appendix C

Construction Safety Standards that have Medical Services or First Aid Requirements or References

Part 1, General Rules

R 408.40132 Medical services and first aid.

R 408.40133 Illumination.

Part 13, Mobile Equipment

1926.604 Site clearing.

1926.605 Marine operations and equipment.

Part 14, Tunnels, Shafts, Caissons, and Cofferdams

R 408.41463 Emergency provisions; plans; equipment; rescue crews.

Part 16, Power Transmission and Distribution

1926.951 Medical Services and First Aid.

Part 35, Confined Space in Construction

1926.1211 Rescue and Emergency Services.

Part 30, Telecommunications for Construction

1910.268(b) General.

1910.268(c) Training.

1910.268(o) Underground lines.

Part 42, Hazard Communication

1910.1200(g) Safety data sheets.

1910.1200(i) Trade secrets.