

U.S. Department of Labor

Occupational Safety and Health Administration
Washington, D.C. 20210



July 24, 1995

Larry M. Starr, Ph.D.
Villanova University
800 Lancaster Avenue
Villanova, Pennsylvania 19085

Dear Dr. Starr:

This is in response to your follow-up letter of May 18, seeking clarification of training requirements under 29 CFR 1910.151 (Medical Services and First Aid).

You specifically requested the following information:

1. Is there a minimum population requirement for a workplace in order for 1910.151 to apply? Would a company of 10 or 25 be exempt from compliance because it is too small?

Response: There are no exemptions from 1910.151 due to a company's size. Many hazardous jobs are performed by smaller firms, and their employees are entitled to equal first aid protection.

2. Are there criteria which define the types of industries which require compliance? For example would a law firm or insurance company be exempt from compliance?

Response: All industries are required to comply with 1910.151 regardless of the type of work performed by employees; however, the hazards and related first aid/medical services required would be less for offices than, for example, steel mills. In summary, the employer's first aid program must correspond to the hazards which can be reasonably expected to occur in the workplace. The employer must evaluate the potential work-related hazards and provide for first aid accordingly.

3. Are there any data available on organizations which have been cited for violation of 1910.151?

Response: During the last fiscal year, Oct. 1, 1993 - Sept. 30, 1994, 1,802 citations were issued for violations of 1910.151. If you would like a printout of these citations, please let me know.

We appreciate your interest in employee safety and health. If we can be of further assistance, please contact [the Office of General Industry Compliance Assistance at (202) 693-1850].

Sincerely,

John B. Miles, Jr., Director
Directorate of Compliance Programs