



April 18, 2002

Mr. John Mateus  
Less Stress Instructional Services  
138 Buena Vista Avenue  
Hawthorne, New Jersey 07506

Dear Mr. Mateus:

Thank you for your November 21, 2001 letter to the Occupational Safety and Health Administration's (OSHA's) Directorate of Compliance Programs. You requested clarification of OSHA standard 29 CFR 1910.151 (Medical Services and First Aid). This letter constitutes OSHA's interpretation only of the requirements discussed and may not be applicable to any questions not delineated within your original correspondence. Your questions have been restated below for clarity. We apologize for the delay in your response.

**Question 1:** How does the ANSI standard Z308.1-1998 relate to 29 CFR 1910.151(b)? In a non-industrial workplace (for example, a corporate office) where employees perform administrative duties and there are no specific employment-related injuries anticipated, would a kit matching the ANSI standard be sufficient for compliance with 29 CFR 1910.151(b)?

**Reply:** Paragraph (b) of 29 CFR 1910.151 requires that in the absence of an infirmary, clinic, or hospital near the workplace, a person or persons must be adequately trained to render first aid. Adequate first aid supplies must be readily available.

ANSI standards become mandatory OSHA standards only when, and if, they are adopted by OSHA; ANSI Z308.1, **Minimum Requirements for Workplace First Aid Kits**, was not adopted by OSHA. However, ANSI Z308.1 provides detailed information regarding the requirements for first aid kits; OSHA has often referred employers to ANSI Z308.1 as a source of guidance for the minimum requirements for first aid kits.

The contents of the first aid kit listed in ANSI Z308.1 should be adequate for a small worksite, like the one you describe in your letter. However, larger or multiple operations should consider the need for additional first aid kits, additional types of first aid equipment, and first aid supplies in larger quantities. You may wish to consult your local fire and rescue department, an appropriate medical professional, your local OSHA area office, or a first aid supplier for assistance in putting together a first aid kit which suits the needs of your workplace. You should also periodically assess your kit and increase your supplies as needed.

**Question 2:** Are there any specific interpretations for the term "readily available"?

**Reply:** The term "readily available" is not defined in the standard. However, responding in a timely manner can mean the difference between life and death. Therefore, the person who has been trained to render first aid must be able to quickly access the first aid supplies in order to effectively provide injured or ill employees with first aid attention. The first aid supplies should be located in an easily accessible



area, and the first aid provider generally should not have to travel through several doorways, hallways and/or stairways to access first aid supplies.

**Question 3:** Can an employer use the interpretation for “near proximity” (the 3-4 minute and 15 minute standards) for determining the quantity and location for first aid supplies?

**[For the response to this question, please see the 01/16/2007 Letter to Mr. Brogan for OSHA's current policy on "near proximity."]**

**Question 4:** Is there a standard for placing first aid kits and/or cabinets based on employee numbers, density, or geography?

**Reply:** 29 CFR 1910.151(b) does not specifically address the placement of first aid kits and/or cabinets based on employee numbers, density, or geography. Therefore, it is the employer's responsibility to assess the particular needs of the workplace and tailor first aid kits and their placement to the specific needs of the workplace.

**Question 5:** What “measuring stick” would an OSHA compliance officer use to determine acceptable first aid supplies for compliance with 29 CFR 1910.151(b)?

**Reply:** OSHA compliance officers take into consideration a variety of factors when assessing compliance with 29 CFR 1910.151(b). The factors that you mention above are some of the things that a compliance officer evaluates when assessing a first aid kit. We cannot provide a list of “exact requirements” which will apply for every workplace; each workplace must be evaluated on a case-by-case basis, taking into account the types of injuries and illnesses that are likely to occur at that workplace.

**Question 6:** Other than inspection of a site for specific hazards, are there quantitative measurements such as employee-to-kit ratios, time frames within which employees should be able to access supplies, etc.?

**Reply:** Please see our response to Question 4.

Thank you for your interest in occupational safety and health. We hope you find this information helpful. OSHA requirements are set by statute, standards and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules. Also, from time to time we update our guidance in response to new information. To keep apprised of such developments, you can consult OSHA's website at <http://www.osha.gov>. If you have any further questions, please feel free to contact the Office of General Industry [Enforcement] at (202) 693-1850.

Sincerely,

Richard E. Fairfax, Director  
Directorate of [Enforcement] Programs