

TOOLBOX TALK #49

MEDICAL TREATMENT BEYOND FIRST AID

Recently, an employer posed a question in a letter to the people at OSHA regarding cold compression therapy. The following is their response.

In your letter, you state that a cold compression therapy device uses cold therapy, non-rigid wraps and compression to treat an injury. You also state that non-rigid supports assist in the reduction of an individual's physical symptoms through support and protection of an injured muscle without limiting range of motion of the joint or muscle tissues involved. Also, according to your letter, "compression treatment" includes the use of elastic wraps and massage. Compression produces a force that helps decrease swelling within the injured tissues. OSHA Recordkeeping regulations require employers to record work-related injuries and illnesses that result in medical treatment beyond first aid. Per OSHA, medical treatment means "the management and care of a patient to combat disease or disorder." Under OSHA regulations, medical treatment does not include "first aid". The standards go on to list what is considered to be first aid. Any treatment not included on this list is NOT considered first aid for OSHA recordkeeping purposes.



Several individual components of a cold compression therapy device are included on the list of first aid treatments. For example, the use of cold therapy, non-rigid means of support (such as elastic wraps), and massage are considered first aid when treating a work-related injury or illness. However, please note, too, that physical therapy is considered medical treatment and is not considered first aid. In general, first aid can be distinguished from medical treatment as follows:

- First aid usually is administered after the injury or illness occurs and at the location (workplace) where the injury or illness occurred
- First aid generally consists of one-time or short-term treatment
- First aid treatments are usually simple and require little or no technology
- First aid can be administered by people with little training (beyond first aid training) and even by the injured or ill person
- First aid is usually administered to keep the condition from worsening, while the injured or ill person is awaiting medical treatment

After further review, OSHA has determined that cold compression therapy is, in fact, medical treatment for the purposes of OSHA recordkeeping requirements.