

OSHA's Hazard Communication Standard (HCS) Update



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The Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (HCS) ensures that critical information about chemical hazards is clearly and consistently communicated in the workplace. It establishes responsibility across the entire chemical supply chain from manufacturers and importers to distributors and employers to safeguard workers through informed handling and use of hazardous substances.

OSHA issued a final rule on May 20, 2024, updating the Hazard Communication Standard (HCS) to better align with the seventh revision of the United Nations' Globally Harmonized System (GHS). The final rule largely impacts manufacturers of products like aerosols, chemicals under pressure, flammable gases, desensitized explosives, and many other chemicals. Major changes include impacts on hazard classes and classification criteria, labeling requirements, and information requirements for Safety Data Sheets (SDSs).

Fortunately, as employers and end users of hazardous chemicals, medical practices are not directly affected by the changes put in place by the final rule. Employers will not be required to make major changes to workplace labeling, employee training, or the content of

the written Hazard Communication (HazCom) plan. However, to remain in compliance with current policies, employers must ensure they take steps to update the information within the practice. This includes:

- **SDSs and Workplace Labels Update:** Employers must ensure they obtain and distribute the most current Safety Data Sheets (SDSs) and container labels from their suppliers, reflecting any updates to chemical classifications and related elements such as pictograms, signal words, and hazard statements.
- **Incorporate Safety Changes:** Employers should review their current HazCom plan to ensure all hazardous chemical related risks are addressed and implement any updated safety requirements related to the risks of the practice reflected in the new SDSs and labels.
- **Train Employees:** HCS requires employers to provide any employees exposed to hazardous chemicals in their work area with effective information and training at the time of their initial assignment (and annually in TN) and whenever a new chemical hazard is introduced into the workplace. With the potential changes made to labels and SDSs, employers should ensure their training programs reflect the most recent updates. The specific requirements of employee training can be found in the HS standard [29 CFR 1910.1200\(h\)](#) and additional guidance on [OSHA's HazCom page](#).

Keeping up with these updates is critical for maintaining compliance with OSHA's Hazard Communication Standard and for ensuring that employees are accurately informed about the chemical hazards they may encounter. Outdated or incorrect hazard information can jeopardize both worker safety and regulatory standing. Medical practices and their designated Safety Officers must stay informed about the changes that affect them and take proactive steps to update their programs in preparation for the July 20, 2026 compliance deadline. For questions related to OSHA compliance, please contact SVMIC's Medical Practice Services department.

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