

You also have the right to contest the citations. The first step of this process is to request an Informal Conference with the manager/supervisor who sent you the citation letter. This meeting must be scheduled within the timeframe listed (usually 15 days of receipt of the citation letter). It can usually be conducted by phone. It is your chance to state your reasons for removing or reducing citations and/or fines. You can ask for a reduction even if you don't have any explanation but "We're sorry and we fixed the problem." OSHA cannot increase the citations or fines and you are not put on a black list. You can usually get some reduction in fines simply by requesting one.

After the Informal Conference, OSHA will send a Settlement Letter to you. The letter will list what changes OSHA is willing to make. You then have a limited time to decide whether to accept the settlement, sign it, return it and pay any remaining fines. Alternately, you may choose to move to the next and final phase, the Formal Hearing.

If you do not accept the Settlement, your last recourse is to request a Formal Hearing. This meeting will be in person before an administrative judge in Raleigh. This step should only be taken if you believe OSHA has violated regulations or if you have a legal reason that you did not violate a regulation. You are allowed to bring a lawyer and your consultant. OSHA also will have attorneys present. The results of the hearing are final.

On a final note, your best protection from OSHA citations is a strong and continuing OSHA program. You need to understand what is expected from your business. Your program should include policies, procedures, strong documentation, good records, current SDS, annual review of safety devices for sharps, and thorough training. ☞

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## New Dental License Renewal Requirements for 2018

The North Carolina General Assembly recently passed two laws that will have a direct impact on the dental license renewal process for 2018. First, House Bill 97, passed in September 2015, required the Dental Board along with several other occupational licensing boards to adopt the North Carolina Medical Board's Policy on the use of opiates in the treatment of pain. After adopting this policy, as it did in October 2015, the Dental Board was then required to adopt rules to require a one-hour continuing education course on the abuse of controlled substances as a condition of license renewal for those who prescribe controlled substances. Therefore, beginning in November 2017, any dentist with a DEA license will be required to certify they have taken a one-hour opioid prescribing course before they will be allowed to renew their dental license for 2018. The one-hour course is not in addition to and may be counted as one of the 15 CE hours currently required. Certification or verification of course credit for opioid prescribing courses is subject to the same CE reporting requirements as found in 21 NCAC 16R .0203.

The Legislature also passed an amendment to the Controlled Substance Reporting System (CSRS) statute that requires licensees who prescribe "a controlled substance for the purpose of providing medical care" to register with the CSRS. Failure of the licensee to register with the CSRS "may constitute cause for the licensing board having jurisdiction over the licensee to suspend or revoke the license." The Dental Board began a "soft" approach to CSRS registration by asking on the 2017 renewal application if a licensee is registered with the CSRS. To facilitate registration a link to CSRS registration was placed under the "What's New" tab on the Board's website. This encouraged, but did not yet require, dentists to register with the CSRS. However, beginning with the renewal of the 2018 dental license, all dentists who are authorized to prescribe controlled substances will be required to register with the CSRS before being allowed to complete the license renewal process. ☞