



**U.S. Department of Labor**  
Occupational Safety & Health Administration

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**Standard Interpretations**

**08/26/2004 - Use of glue to close a wound is medical treatment; prescription antibiotics/antiseptics for preventive treatment of a wound is medical treatment.**

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• **Standard Number:** 1904; 1904.7(b)(5)(ii)

**This letter constitutes OSHA's interpretation only of the requirements discussed and may not be applicable to any situation not delineated within the original correspondence.**

August 26, 2004

Mr. Ronald Bjork  
Manager, Safety, Health & Security  
CNH America LLC  
East Moline Plant  
1100 Third Street  
East Moline, IL 61244

Dear Mr. Bjork:

This is in response to your letter of April 21, 2004 requesting clarification whether two types of treatments constitute first aid or medical treatment for purposes of applying OSHA's recordkeeping rule.

The first treatment is glue used to close a wound. The use of medical glue to close a wound is not first aid, and therefore must be considered medical treatment. First aid includes the use of the following wound-covering devices: bandages, Band Aids®, gauze pads, butterfly bandages, or Steri-Strips®, 29 CFR 1904.7(b)(5)(ii)(D). Other wound-closing devices, such as sutures, staples, tapes, or glues are considered medical treatment. See 66 FR 5989 (January 19, 2001).


The second treatment is the use of a prescription antibiotic for a puncture wound. Under the rule, the use of prescription medication to treat a wound is medical treatment. This follows even if the medication is an antibiotic or antiseptic administered following an injury to prevent a possible infection. In the preamble to the rule, OSHA specifically considered and rejected an exception for prescription antibiotics or antiseptics. See 66 FR 5986.

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. In addition, 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 contact my Division of Recordkeeping Requirements, at 202 693-1702.

Sincerely,

Keith Goddard, Director  
Directorate of Evaluation and Analysis

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