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Standard Interpretations

08/08/2002 - Use of liquid bandages on wounds is considered first aid.

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• **Standard Number:** [1904.7\(b\)\(5\)\(ii\)\(D\)](#)

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>.

August 8, 2002

Mr. Carl O. Sall, CIH
Director of Occupational Safety and Health Compliance
Comprehensive Health Services Incorporated
8229 Boone Boulevard; Suite 700
Vienna, Virginia 22182-2623

Dear Mr. Sall:

This is in response to your letter dated August 8, 2002. Thank you for your comments pertaining to the Occupational Safety and Health Administration's (OSHA) Injury and Illness Recording and Reporting requirements contained in 29 CFR Part 1904.

Specifically, you ask OSHA to clarify whether an injury and illness case which resulted in treatment with Band-Aid Brand Liquid Bandage would be considered first aid or medical treatment. The concept that underlies the medical treatment vs. first aid distinction made between this type of treatment centers around the basic difference between wound closures and wound coverings. The recordkeeping rule defines first aid under section 1904.7(b)(5)(ii)(D), "Using wound coverings, such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-strips™ (other wound closing devices, such as sutures, staples, etc. are considered medical treatment)." Therefore, the use of wound coverings, like Band-Aid Brand Liquid Bandage™ is deemed to be first aid treatment.

I hope that you find this information useful. Thank you for your interest in occupational safety and health and OSHA. If you have any further questions, please contact the Division of Recordkeeping Requirements at 202-693-1702.

Sincerely,

John L. Henshaw
Assistant Secretary

[Corrected 8/8/2004]

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