10 things an inspector asks a Texas dental office to produce in 2026

An OSHA compliance officer or a Texas State Board of Dental Examiners investigator does not ask whether you are compliant. They ask for documents. These are the ten, in the order they are usually requested. If any one takes more than a few minutes to put on the table, that is the finding.

1. **Your written Exposure Control Plan, reviewed and dated within the last 12 months.** It must include the annual evaluation of safer sharps devices and show that non-managerial clinical staff were asked for input. 29 CFR 1910.1030(c)(1)(ii)-(v)
2. **Hepatitis B vaccination records or a signed declination for every clinical employee.** The vaccine must be offered within 10 working days of starting, at no cost. 1910.1030(f)(2), Appendix A
3. **Bloodborne pathogens training records, initial and annual, for each employee.** Dates, content summary, trainer's qualifications, kept three years. 1910.1030(g)(2), (h)(2)
4. **Sharps injury log and post-exposure files.** Any needlestick: how it happened, source testing, the healthcare professional's written opinion within 15 days. Medical records kept for employment plus 30 years. 1910.1030(f)(3)-(5), (h)(1), (h)(5)
5. **Written Hazard Communication program with a chemical list, SDS access and labeled spray bottles.** Second most-cited standard in dental offices. Must be updated for HazCom 2024 by **November 20, 2026**. 1910.1200(e), (f), (g)(8), (h)
6. **Sterilizer spore-test log, at least weekly, and dental unit waterline test results.** Texas enforces CDC dental guidelines by reference; the Board treats a violation as negligence. 22 TAC 108.23, 108.24; CDC 2016 Summary
7. **PPE hazard assessment certification and a working eyewash in the sterilization area.** 1910.132(d)(2); 1910.151(c)
8. **HIPAA security risk analysis, written policies, training records, Notice of Privacy Practices, and a signed BAA with every vendor** (practice management software, cloud backup, IT, shredding, billing). Plus Texas HB 300 training within 90 days of hire, signed statements kept six years. 45 CFR 164.308, 164.530, 164.520, 164.504(e); H&S Code 181.101
9. **SB 1188 evidence:** written confirmation from your EHR and backup vendors that patient data is stored in the United States, your patient notice of AI use, and a parental-access procedure for minors' records. H&S Code 183.002, 183.005, 183.006
10. **Postings and Board items:** the TSBDE complaint notice (5x7 inch sign or printed on forms), each dentist's and hygienist's current registration on the wall, the OSHA Job Safety and Health poster, current CPR cards, and patient records kept five years (seven for orthodontic device documentation from May 28, 2026). 22 TAC 108.3, 108.7, 108.8, 108.11; 29 CFR 1903.2

THREE THINGS THAT CHANGED

HazCom 2024 deadline: November 20, 2026. OSHA extended the employer date in January 2026. Before it arrives, the written program, chemical list, secondary-container labels and training have to reflect the new SDS formats manufacturers began shipping in May.

Texas SB 1188 is in force. Effective September 1, 2025, with US-only data storage from January 1, 2026. Your HIPAA binder does not cover it: it needs vendor attestations, a patient AI-use disclosure, a biological-sex field in the EHR and parental access to minors' records. Attorney General penalties run to $250,000 per violation, and the Board can discipline after three.

OSHA's small-employer penalty policy changed July 14, 2025. Offices with 11-25 employees now get up to a 70% size reduction and a 20% history reduction. Maximum penalties were frozen at 2025 levels for 2026 ($16,550 per serious violation; $165,514 willful or repeat). The reductions only apply to an office that can show a program on the day of the inspection.

WHAT DID NOT CHANGE

No new CDC dental guidance (the CDC oral health division and HICPAC were closed in 2025). No final HIPAA Security Rule (now targeted for 2027). No new TSBDE infection control rule. Texas inspectors in 2026 are working from the same list as 2024. The gap is not new rules. It is paperwork that is out of date.

What we do

We write and maintain your OSHA and HIPAA manuals for your state and specialty, run your team's annual training with records kept for you, and review a short video walkthrough your office manager records before an inspector walks the office in person. A named compliance contact answers by email within one business day. If you are inspected, we prepare the response.

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Sources: osha.gov/laws-regs (1910.1030, 1910.1200, 1910.132, 1904 Subpart B App. A); osha.gov/penalties and the May 21, 2026 OSHA penalties memo; osha.gov/hazcom/rulemaking/extension; 22 Texas Administrative Code Part 5 Chapter 108; CDC Summary of Infection Prevention Practices in Dental Settings (2016); Texas Health and Safety Code Chapters 181 and 183 (SB 1188, 89th Legislature). This sheet is general information, not legal advice.