OSHA Encourages Employers to Prepare for Workplace Opioid Overdose Emergencies

Honigman | October 21, 2026

The Occupational Safety and Health Administration ("OSHA") recently issued new guidance encouraging employers to prepare for opioid-related overdose emergencies in the workplace. OSHA's new fact sheet, Opioid Overdose Rescue with Reversal Medications, recommends that employers consider keeping opioid overdose reversal medications, such as naloxone (commonly known by the brand name Narcan) or nalmefene, readily available and educating employees on how to respond when an overdose is suspected.

Importantly, OSHA's guidance is informational and does not impose any new compliance requirements. Nevertheless, the guidance provides employers with a useful framework for evaluating whether to incorporate opioid overdose preparedness into their existing workplace safety and emergency-response practices.

OSHA's Recommended Workplace Practices

OSHA notes that opioid overdoses can occur in any workplace and that having reversal medications available can provide critical assistance while emergency medical personnel are on the way. Naloxone and nalmefene work by temporarily reversing the effects of opioids and restoring normal breathing. Some naloxone nasal sprays are available over the counter, while other products may require a prescription.

For employers that choose to maintain opioid overdose reversal medications in the workplace, OSHA recommends several practical measures, including:

Keep reversal medications accessible. OSHA recommends treating overdose kits similarly to first-aid kits and automated external defibrillators ("AEDs") by storing them in visible and easily accessible locations. Larger workplaces may consider maintaining kits in multiple locations.

Manage and monitor supplies. Employers should follow applicable storage instructions, monitor expiration dates, and designate an individual, such as a safety officer, to ensure that medications are properly stored and replenished.

Inform employees. Employees should know which reversal medication is available in the workplace, where it is located, and generally how it is used.

Provide training. OSHA recommends considering voluntary training addressing signs of an opioid overdose, administration of the medication, the possible need for additional doses, safely positioning an individual while awaiting emergency assistance, and applicable state Good Samaritan protections.

Call 911. Reversal medications are temporary and are not a substitute for professional medical care. OSHA emphasizes that emergency services should be contacted immediately when an

overdose is suspected, even if the individual regains consciousness after the medication is administered.

Employers Should Consider State-Specific Liability Protections

Employers considering whether to stock opioid reversal medications should also evaluate the protections available under applicable state Good Samaritan laws. As OSHA recognizes in its guidance, those protections vary by state and may affect individuals and employing entities differently.

Michigan provides one example. Under Michigan law, an individual who, in good faith, believes another individual is suffering the immediate effects of an opioid-related overdose generally is not subject to civil liability for damages resulting from administering an opioid antagonist. That protection does not apply to willful or wanton misconduct and is subject to certain additional limitations. Notably, while the statute expressly protects the individual administering the medication, it does not expressly provide the same immunity to an employer or other entity on whose premises the medication is maintained or whose employee administers it.

Accordingly, employers should not assume that an employee's individual Good Samaritan protection necessarily provides equivalent protection to the employer. Employers implementing an overdose-response program should review the laws applicable in each state where they operate, including rules governing acquisition and possession of reversal medications and the scope of available civil-liability protections.

Do Employers Need to Update Their Drug and Alcohol Policies?

OSHA's guidance does not require employers to revise their drug and alcohol policies, and a wholesale policy revision may not be necessary. Employers that choose to maintain reversal medications, however, should consider whether their existing safety policies, emergency-response procedures, or drug and alcohol policies adequately communicate the company's procedures for responding to a suspected overdose.

At a minimum, employers may want to adopt a brief written protocol identifying (i) where opioid reversal medications are located, (ii) whom employees should contact in an emergency, and (iii) the requirement to call 911 immediately whenever an overdose is suspected or reversal medication is administered. Employers should also ensure that their written procedures correspond with the training provided to employees and avoid creating confusion about whether contacting emergency responders should be delayed while locating or administering the medication.

What Employers Should Do Now

In light of OSHA's guidance, employers should consider:

- Evaluating whether maintaining naloxone or another opioid reversal medication is appropriate for their workplaces;

- Identifying accessible locations for overdose kits and establishing procedures for monitoring storage conditions and expiration dates;
- Training designated employees on recognizing and responding to suspected opioid overdoses and making broader workforce awareness training available;
- Adopting a written emergency-response protocol identifying where reversal medications are located and requiring employees to call 911 when an overdose is suspected or medication is administered;
- Reviewing applicable state Good Samaritan, pharmacy, and liability laws before implementing a workplace program; and
- Periodically reviewing the program to ensure that medication supplies, employee training, and emergency procedures remain current.

Key Takeaway

OSHA's new guidance does not require employers to keep naloxone or other opioid reversal medications in the workplace, but it reflects an increased emphasis on preparing employers and employees to respond quickly to opioid-related emergencies. Employers may wish to consider adding reversal medications to their existing first-aid and emergency-response programs and providing employees with appropriate training. Employers that do so should also establish clear procedures requiring immediate contact with emergency medical services and evaluate state-specific liability protections, particularly in jurisdictions such as Michigan where statutory immunity expressly protects individual responders but may not extend the same protection to the employer itself.