

**TDI**

**Safety @ Work**  
Division of Workers' Compensation



# **Checklist** **Bloodborne Pathogens** **Exposure Control**



# DISCLAIMER

This Bloodborne Pathogens Exposure Control Checklist is provided as a public service by the Texas Department of Insurance, Division of Workers' Compensation (**DWC**) and the Texas Occupational Safety and Health Consultation Program (**OSHCON**). The information in this document was produced, unless otherwise noted, from staff subject specialists, government entities, or other authoritative sources. Information contained in this publication is considered accurate at the time of publication. For more free DWC publications on this and other safety topics and for free occupational safety and health audiovisual loans, visit [www.txsafetyatwork.com](http://www.txsafetyatwork.com), call 1-800-252-7031, option 2, or email [resourcecenter@tdi.texas.gov](mailto:resourcecenter@tdi.texas.gov).

# INTRODUCTION

The purpose of this checklist is two-fold: 1) to answer questions to help employers and employees understand the requirements to protect employees who are occupationally exposed to hepatitis B virus (**HBV**), hepatitis C virus (**HCV**), human immunodeficiency virus (**HIV**), and other potentially infectious materials (**OPIM**); and 2) provide employers a self-audit tool to ensure their company bloodborne pathogens safety and health plan complies with the Occupational Safety and Health Administration (**OSHA**) standards in 29 Code of Federal Regulations (**CFR**) 1910.1030.

Acquired immunodeficiency syndrome (**AIDS**) and hepatitis B merit serious concern for employees occupationally exposed to blood, other infectious materials, and certain other body fluids that contain bloodborne pathogens such as HIV and HBV. Millions of workers in health care and public safety occupations potentially are exposed to these viruses. Such workers include physicians, dentists, dental employees, phlebotomists, nurses, morticians, paramedics, medical examiners, laboratory technologists, blood bank technicians, housekeeping personnel in health care institutions, laundry workers, employees in long-term-care facilities, and in-home health care workers. Other workers, who may be occupationally exposed to blood or OPIMs, depending on work assignments may include research laboratory workers and public safety personnel, such as fire, police, rescue, and correctional staff.

Exposure to bloodborne pathogens occurs in many ways. Although needlestick injuries are the most common means of exposure for health care workers, bloodborne pathogens can also be transmitted through contact with eyes, nose, and mouth, or through broken skin. The Texas Department of Insurance, Division of Workers' Compensation (**DWC**) recognizes the need to safeguard workers from health hazards related to bloodborne pathogens. This interactive, fillable, Bloodborne Pathogens Exposure Control Checklist aims to reduce the risk of occupational exposure to bloodborne diseases at your facility as part of a comprehensive safety and health management program.

## Resources

### Items you will need:

- **29 CFR 1910 for General Industry**

### For additional help contact:

- **Occupational Safety and Health Administration (OSHA)**

**[www.OSHA.gov](http://www.osha.gov)**

standards and regulations resource

**<https://www.osha.gov/Publications/osha2254.pdf>**

free publications on OSHA requirements

- **Texas Occupational Safety and Health Consultation (OSHCON) Program**

free on-site safety inspections and OSHA counseling

**[www.txoshcon.com](http://www.txoshcon.com)**

**[OSHCON@tdi.texas.gov](mailto:OSHCON@tdi.texas.gov)**

**1-800-252-7031, Option 2**

- **Texas Department of Insurance, Division of Workers' Compensation (DWC)-Workplace Safety**

authorized outreach instructors offering on-site safety and health training

**[www.txsafetyatwork.com](http://www.txsafetyatwork.com)**

**[safetytraining@tdi.texas.gov](mailto:safetytraining@tdi.texas.gov)**

**1-800-687-7080**

# **TABLE OF CONTENTS**

## **Bloodborne Pathogens Exposure Control Checklist**

<b>PART I: Questions &amp; Answers About Occupational Exposure.....</b>	<b>5</b>
Bloodborne Pathogens Standard.....	6
Exposure Control Plans .....	10
Exposure Determination .....	10
Training .....	11
Preventive Measure-Hepatitis B Vaccination .....	12
Universal Precautions .....	13
Engineering Controls and Work Practices .....	14
Personal Protective Equipment .....	16
Housekeeping.....	18
Labeling and Exposure Incidents.....	20
Recordkeeping .....	23
<b>PART II: Self-Audit Checklist .....</b>	<b>25</b>
Exposure Control Plan .....	25
Sharps Containers .....	27
Training .....	28
Personal Protective Equipment.....	31
Gloves.....	31
Face and Eye Protection .....	31
Cleaning and Decontamination .....	32
Hepatitis B Vaccine.....	33
Labeling.....	36
<b>APPENDIX A: Sample Statement of Declination .....</b>	<b>37</b>
<b>APPENDIX B: Bloodborne Pathogens Exposure Control Plan.....</b>	<b>38</b>
<b>APPENDIX C: Engineering and Work Practices Controls/Terms .....</b>	<b>40</b>
<b>APPENDIX D: Sample Sharps Injury Log .....</b>	<b>45</b>

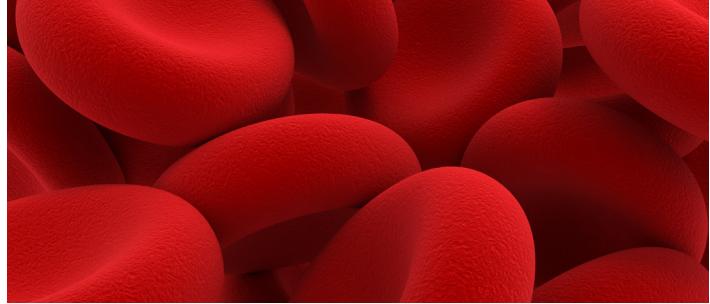
# PART I

## Questions & Answers-Occupational Exposure

### Bloodborne Pathogens Standard

#### 29 CFR 1910.1030

The bloodborne pathogens standard tells how to determine who has occupational exposure and how to reduce workplace exposure to bloodborne pathogens.



#### Q. What are bloodborne pathogens?

- A. Bloodborne pathogens are microorganisms that can cause disease when transmitted from an infected individual to another individual through blood and certain body fluids. Bloodborne pathogens can cause serious illness and death. The most common illnesses caused by bloodborne pathogens are hepatitis B, hepatitis C, and AIDS from HIV.

#### Q. What is HBV?

- A. HBV is the virus that causes hepatitis B. Hepatitis B, formerly called "serum hepatitis," is a life-threatening bloodborne pathogen and a major risk to employees in jobs where there is exposure to blood and OPIMs. Hepatitis, which means "inflammation of the liver," can be caused by drugs, toxins, autoimmune disease, and infectious agents, including viruses.

#### Q. What is HCV?

- A. HCV is the virus that causes hepatitis C. It is the most common chronic bloodborne infection in the United States and is primarily transmitted through large or repeated direct percutaneous (through the skin) exposure to blood. Most people who are chronically infected are not aware of their infection because they are not clinically ill. Infected persons can infect others and are at risk for

chronic liver disease or other HCV-related chronic diseases. Currently there is no vaccine against hepatitis C.

#### Q. Who is covered by the bloodborne pathogens standard?

- A. OSHA's rule applies to all persons who are occupationally exposed to blood or OPIMs. Blood means human blood, blood products, or blood components. OPIM include the following:
- human body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, any bodily fluid visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids;
  - any unfixed tissue or organ (other than intact skin) from a human (living or dead); and
  - HIV-containing cell or tissue cultures, organ cultures, and HIV - or HBV-containing culture medium or other solutions as well as blood, organs, or other tissues from experimental animals infected with HIV or HBV.

## **Q. Are there specific occupations covered by the standard?**

- A. The hazard of exposure to infectious materials affects employees in many types of jobs. The following occupations are likely to be covered by the standard, but the scope of the standard is not limited to employees in these occupations:
- physicians, physicians' assistants, nurses, nurse practitioners, and health care employees in clinics and physicians' offices;
  - employees of clinical and diagnostic laboratories;
  - housekeepers in health care facilities;
  - workers in hospital laundries or commercial laundries who serve health care or public safety institutions;
  - tissue bank personnel;
  - employees in blood banks and plasma centers who collect, transport, and test blood;
  - employees in freestanding clinics such as hemodialysis, urgent-care, health maintenance organization, and family planning;
  - employees in clinics in industrial, education and correctional facilities, (e.g., those who collect blood or clean and dress wounds);
  - employees assigned to provide emergency first aid;
  - dentists, dental hygienists, dental assistants, and dental laboratory technicians;
  - staff of institutions for the developmentally disabled;

- hospice employees;
- home health care workers;
- staff at nursing homes and long-term care facilities;
- employees of funeral homes and mortuaries;
- workers at HIV and HBV research laboratories and production facilities;
- employees handling regulated waste;
- emergency medical technicians, paramedics, and other emergency medical service providers; and
- firefighters, law enforcement personnel, and correctional officers.

## **Q. How do employers determine if their employees are included in the scope of the standard?**

- A. The standard requires employers to evaluate each job task and procedure to determine which employees may be occupationally exposed to blood or other potentially infectious materials. The exposure determination is made without regard to the use of personal protective equipment (PPE), because employees are considered exposed even if they wear PPE. If it is determined that exposure exists, the employer will be held responsible for providing the protections of 29 CFR 1910.1030.





**Q. If I have employees who may rarely come into contact with blood or OPIM, do all rules still apply?**

- A. Employers with employees who are not routinely exposed to blood or OPIM may fall under the standard. In this case the hepatitis B vaccination is not required to be offered until an incident involving the presence of blood or OPIM occurs. For an employer to qualify under the standard, the following conditions must be met:
- Reporting procedures must be in place under your organization's exposure control plan to ensure that all incidents involving blood or OPIM are reported before the end of the work shift during which the incident occurred.
  - Reports of incidents must include the names of all involved employees, including a description of the circumstances of the incident, date, time, and a determination of whether an exposure incident, as defined by the standard, occurred.
  - Incidents and exposure reports are required and must be readily available to all employees and provided to OSHA upon request.
  - The specifics of the reporting procedure must be included in the bloodborne pathogens training.

- All employees involved in any situation involving the presence of blood or OPIM, regardless of whether exposure occurred, must be offered the full hepatitis B vaccination no later than 24 hours after the incident. If an exposure incident, as defined in 29 CFR1910.1030 occurs, all other post-exposure follow-up procedures in accordance with the standard must be started immediately. Also, the employer must ensure that the medical provider is familiar with and follows the Centers for Disease Control recommendations for post-exposure follow-up.

- Bloodborne pathogens training is required for all affected employees.
- Employers must provide appropriate PPE, clean-up materials, and equipment.

**Q. Are Good Samaritan acts considered an occupational exposure?**

- A. Good Samaritan acts are not covered under the OSHA standard. If an employee has an exposure incident while acting as a Good Samaritan and that employee is not expected to give aid as part of his or her job duties, the employer is not required by the OSHA standard to provide HBV vaccination series, post-exposure evaluation, follow-up procedures, or any other protections of the OSHA standard. However, if the employee was acting as a Good Samaritan and was injured, they may be covered by workers' compensation insurance on case-by-case bases.

**Q. Do cleanup activities of blood or OPIM constitute occupational exposure?**

- A. Yes. Employees who clean up and decontaminate areas or surfaces are considered to have occupational exposure. Such employees are covered under the OSHA standard.

**Q. Are motel/hotel housekeepers included in the scope of the rules?**

- A. Employees in the lodging industry are covered under the standard if there is a reasonable expectation that occupational exposures to blood or other potentially infectious material will occur in the performance of their job duties. The standard is a performance standard and requires the employer to determine occupational exposures without regard to personal protective clothing or equipment. Every location may have individual considerations that must be evaluated to determine exposures. If it is determined that the standard applies to the work location, action should be taken to develop an exposure control plan; provide employee training, information, and PPE; offer the hepatitis B vaccination series; and comply with the other provisions of the standard.

**Q. Are janitorial services covered by the standard?**

- A. Janitorial, custodial, or maintenance staff employed in non-health-care facilities are not generally considered to have "reasonably anticipated skin, eye, mucous membrane exposures, or parenteral exposure to blood or other potentially infectious materials that may result from the performance of an employee's duties." It is the employer's responsibility to determine which job classifications or specific tasks and procedures involve occupational exposure.

**Q. Are chiropractors who may perform invasive procedures involving blood covered by the standard?**

- A. Chiropractors with no paid employees and no workers' compensation coverage would not be covered by the standard. Chiropractors with paid employees not reasonably expected to be exposed to blood or OPIM in the performance of their duties would not come under the standard.

If chiropractors themselves, who are covered by workers' compensation, perform procedures for which there is a reasonable anticipation of exposure to blood or OPIM, they fall under the scope of the standard, as would any of their employees whose job duties placed them at risk.

**Q. ABC Healthcare Employment Agency has a large personnel pool providing hospital staffing and private-duty nursing services. The employees are on ABC's payroll. Who is responsible, the employment agency or the client?**

- A. Personnel providers who send employees to work at other facilities are considered employers whose employees may be exposed to hazards. Because ABC maintains a continuing relationship with the employees, but another employer creates and controls the hazards, there is a shared responsibility to comply with the standard. The temporary employee would be required to provide generic training in universal precautions, ensure that employees are provided with required vaccinations, and ensure that proper follow-up evaluation is provided following any exposure incident. The client would be responsible for providing site-specific training and PPE and for controlling potential exposure conditions. The client may specify qualifications for personnel, including vaccination status. It is in the best interest of the temporary employee to ensure that all requirements of the standard are met by the client employer to ensure a safe and healthful workplace for the leased employees.

**Q. Are the construction, maritime, and agricultural industries covered by the bloodborne pathogen standard?**

A. Yes. The bloodborne pathogen standard applies to all employers at worksites where there is a reasonable possibility of skin, eye, mucous membrane, or other contact with blood or OPIM that may result from the performance of an employee's duties. It is the employer's responsibility to determine which job classifications or specific tasks and procedures involve occupational exposure.

**Q. Are dry-cleaning and laundromat operations covered by the standard?**

A. OSHA believes that some laundry workers are at risk of exposure to bloodborne pathogens. These individuals may be employed in hospital or commercial laundries that serve health care, public safety, or other institutions where occupational exposure to blood or OPIM occurs.

**Q. Are first-aid-trained employees covered by the standard?**

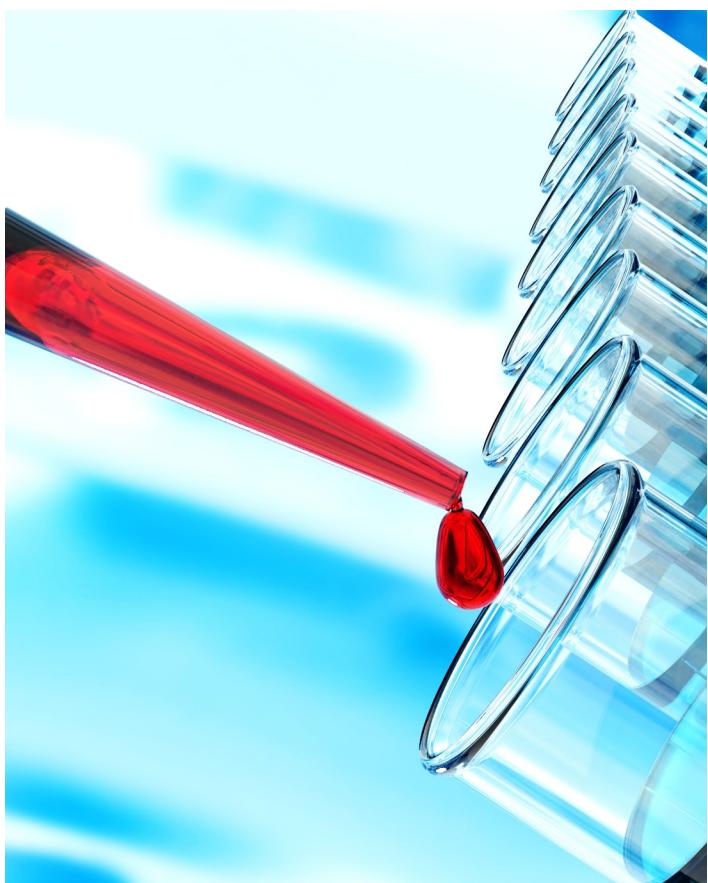
A. First-aid-trained employees assigned to provide emergency first aid as part of their specific job duties are covered by the standard. Examples include occupational nurses or employees in charge of first-aid stations. Position descriptions for such employees would stipulate rendering first aid to fellow employees. Any first-aid-trained employee who rendered first aid should receive treatment under post-exposure evaluation and follow-up, Section (f)(3). All first-aid-trained employees must have PPE available to them and must be informed about exposure hazards and post-exposure procedures.

**Q. Can ambulance drivers or helicopter pilots eat while transporting a patient or human body parts or organs?**

A. Ambulance drivers or pilots can eat and drink during transportation of patients, body parts, or organs provided that the cab, compartment, or operator have not been contaminated with blood or other potentially infectious materials. The employer may implement procedures for changing contaminated clothing and washing prior to entering the vehicle and/or ensuring that patients and potentially contaminated material remain behind a separating partition.

**Q. When is urine or feces covered as "other potentially infectious material"?**

A. When there is visible blood. Nasal secretions and tears that have visible blood are also defined as OPIMs.



## Exposure Control Plan

### **29 CFR 1910.1030(c)**

The standard requires the employer to develop a written exposure-control plan to identify workers with occupational exposure to blood and other potentially infectious materials and to specify the methods of protecting and training employees.

#### **Q. What is required in the exposure control plan?**

- A. At a minimum, the exposure control plan must include:
- the exposure determination;
  - the procedures for evaluating the circumstances surrounding an exposure incident; and
  - the schedule and method for implementing the provisions of the standard. This schedule may be as simple as a calendar with brief notations describing the methods of implementation and an annotated copy of the standard. The plan must be reviewed and updated annually or whenever new tasks and procedures affect employees' occupational exposure. It must be made accessible to employees in accordance with CFR 29 1910.30(c).

#### **Q. Does DWC have a sample exposure control plan?**

- A. Yes. Refer to Appendix B, or download a detailed Bloodborne Pathogens Sample Written Program at [www.tdi.texas.gov/wc/safety/videoresources/](http://www.tdi.texas.gov/wc/safety/videoresources/).

## Exposure Determination

### **29 CFR 1910.1030(c)**

As an element of the exposure control plan, every employer must identify workers with occupational exposure to blood and other potentially infectious materials.

#### **Q. How do I know if any of my employees have occupational exposures?**

- A. Exposure determination is based on the definition of occupational exposure without regard to personal protective clothing and equipment. Exposure determination is made by reviewing job classifications within the work environment and sorting exposures into two groups. Once employees with occupational exposure are identified, communicate the hazards to these employees. The two groups are:
- job classifications in which all the employees have occupational exposure, such as operating room scrub nurses\*; and
  - job classifications in which some of the employees have occupational exposure, such as hospital laundry workers handling contaminated laundry\*.

(\*In the first group, it is not necessary to list specific work tasks. In the second group, specific tasks and procedure causing occupational exposure must be listed.)

#### **Q. Do clinical or diagnostic laboratories that analyze blood or OPIMs have to comply with this section of the rules?**

- A. Yes, but they are exempt from Section (e), which covers HIV and HBV research laboratories and production facilities. OSHA recommends that universal precaution procedures are followed in clinical or diagnostic laboratories.

## Training

### **29 CFR 1910.1030(g)**

Each occupationally exposed employee must be given bloodborne-pathogen information and training at the time of initial assignment. The training must be conducted during working hours at no cost to the employee. Training must be repeated at least once a year - more often if new or modified tasks involve occupational exposure to bloodborne pathogens that affect employees.

### **Q. Who is qualified to conduct training and provide information?**

A. Possible trainers include a variety of health care professionals such as infection control practitioners, nurse practitioners, physicians' assistants, and emergency medical technicians. Non-health-care professionals such as industrial hygienists, epidemiologists, or professional trainers may conduct the training if they can demonstrate knowledge and training in the area of bloodborne pathogens. Trainers must provide information appropriate to the educational level, literacy, and language of the audience. The information must contain the following:

- explanation of the regulatory text and how to get a copy of it;
- information on the epidemiology and symptoms of bloodborne diseases;
- how bloodborne pathogens are transmitted;
- explanation of the exposure control plan and how to get a copy of it;
- how to recognize tasks that might result in occupational exposure;
- explanation of the use and limitations of work practices, engineering controls, and PPE;

- information on the types, selection, proper use, location, removal, handling, decontamination, and disposal of PPE;
- information about the hepatitis B vaccination series: its safety, benefits, methods of administration, and availability;
- who to contact and what to do in an emergency;
- how to report an exposure incident and conduct the post-exposure evaluation and follow-up;
- information about warning labels, signs, and color-coding;
- question-and-answer session(s) on any aspect of the training;
- additional training in standard microbiological practices and techniques, practices and operations specific to the facility, and the proper handling of human pathogens or tissue cultures (required for employees who work in HIV and HBV laboratories and production facilities); and
- additional training before beginning initial work assignments.

### **Q. Can generic training programs, "outside" trainers, or videos/DVDs be used?**

A. Yes, if "site-specific" information and employee interaction with the trainer is also provided. OSHA evaluates training based on employee knowledge or performance. Audiovisual programs on bloodborne pathogens are available from the DWC Resource Center by calling (512) 804-4620 or visiting the website at [www.txsafetyatwork.com](http://www.txsafetyatwork.com).

**Q. Will DWC provide training to our employees?**

- A. Yes. DWC can conduct Bloodborne Pathogen training at your site for a minimal cost. Please call the Safety Training Team Leader at 512-804-4626 for additional information.

**Q. Will DWC review and approve our exposure-control plan, training, PPE, or other products?**

- A. If your company does business in the state of Texas, is in private industry, and has less than 250 employees at the consultation site and no more than 500 employees at all sites controlled by the employer, you may receive assistance from the Texas Occupational Safety & Health Consultation (OSHCON) Program. (Limited assistance may be available for larger employers.) Employers can request OSHCON information by calling 1-800-252-7031, Option 2 or email [OSHCON@tdi.texas.gov](mailto:OSHCON@tdi.texas.gov).

### Preventive Measures Hepatitis B Vaccination

**29 CFR 1910.1030(f)**

The requirements for hepatitis B vaccinations are designed to protect employees from bloodborne pathogens by requiring employers to provide hepatitis B vaccinations and medical follow-up after an exposure incident. Early intervention, testing, counseling, and appropriate action to prevent the disease can reduce the risk of infection and prevent further transmission.

**Q. Who is required to have HBV vaccinations?**

- A. Employers must make the hepatitis B vaccination series available to all employees who have occupation exposure. They must also provide post-exposure evaluation and follow-up to all employees who experience an exposure incident. The vaccinations and all medical evaluations and follow-up must be provided at no cost to the employee, provided at a reasonable time and place, and performed by or under the supervision

of a licensed physician or other licensed health-care professional. Vaccinations must be administered according to current recommendations of the U.S. Public Health Service. Employees who decline the vaccination must sign a declination form. (See Appendix A.) Employees who request the vaccination series later must receive it at no cost if they continue to be exposed.

**Q. When must the HBV vaccination be offered?**

- A. The hepatitis B vaccination series must be offered to employees who have occupational exposure to blood or other potentially infectious materials within 10 working days of initial assignment, unless the employee has previously received the series; has antibody testing that reveals the employee is immune; or, for medical reasons, the employee cannot be vaccinated. Employers are not required to provide medical pre-screening, and employees are not required to submit to pre-screening. The employer must obtain and provide the employee either a copy of the health-care professional's written opinion stating whether a hepatitis B vaccination was indicated for the employee and whether the employee received such vaccination. Any booster doses of the hepatitis B vaccine recommended by the U.S. Public Health Service also must be provided at the employer's expense.

**Q. What if an employee refuses to be vaccinated?**

- A. The standard requires the employer to obtain a signed declination from each employee who refuses vaccination. The declination statement used by the employer must contain the language found in Appendix A. No words may be added or subtracted. A sentence releasing the employer from liability may not be added.

**Q. If an employee who wants an HBV vaccine believes he or she is allergic to the vaccine, is the employer required to pay for allergy tests to determine if the employee can safely receive the vaccination?**

- A. It is the employer's responsibility to bear the cost of allergy tests recommended by the physician.

**Q. Is pre-screening required for hepatitis B serum?**

- A. No. The standard does not require pre-screening of employees for hepatitis B; neither is prescreening prohibited. Pre-screening for immunity cannot be used in lieu of offering hepatitis B vaccination.

**Q. If an employee begins the vaccination series and terminates employment before the series is complete, can he or she be charged for the remaining vaccine?**

- A. No. Section (f)(ii)(A) of the standard requires the employer to offer hepatitis B vaccination at no cost to the employee.

**Q. Do my employees need to have a test for hepatitis B antibodies after they complete the vaccination series?**

- A. The most current CDC guideline regarding hepatitis B recommends that employees who have ongoing contact with patients or blood and are at ongoing risk for injuries with sharp instruments or needle sticks be tested for antibody to hepatitis B surface antigen one to two months after the completion of the three dose vaccination series. Employees who do not respond to the primary vaccination series must be re-vaccinated with a second three dose vaccine series and retested. A physician must evaluate employees who do not respond to the second vaccine series.



## Universal Precautions

### 29 CFR 1910.1030(c)

Universal precautions must be observed. This method of infection control requires the employer and employee to assume that all human blood and specified human body fluids are infectious for HIV, HBV, and other bloodborne pathogens. When it is difficult or impossible to tell the difference between the types of body fluids, all body fluids are to be considered potentially infectious.

### Standard precautions and body substance isolation

Alternative concepts in infection control are called body substance isolation (BSI) and standard precautions. These methods define blood and all body fluids (with or without blood) and mucous membranes as infectious. This method incorporates not only the fluids and materials covered by this standard but expands coverage to include all body fluids and substances. These concepts are acceptable alternatives to universal precautions, provided facilities using it adhere to all other provisions of the Bloodborne Pathogens standard.

## Engineering Controls and Work Practices

### 29 CFR 1910.1030

Engineering controls and work practices are the primary methods used to prevent occupational transmission of HBV, HCV, HIV, and other bloodborne pathogens. Personal protective clothing and equipment also are necessary when occupational exposure to bloodborne pathogens remains even after instituting these controls.

Engineering controls reduce employee exposure in the workplace by either removing or isolating the hazard or isolating the worker from exposure. Self-sheathing needles, needle systems, puncture resistant disposal containers for contaminated sharp instruments, resuscitation bags, and ventilation devices are examples of engineering controls. Engineering controls must be examined and maintained or replaced on a schedule.

The standard also requires that every employer with employees who use medical sharps in direct patient care must identify, evaluate, and select engineering and work-practice controls, including safer medical devices, at least annually.

Evaluation of safer medical devices must involve non-managerial front-line employees responsible for direct patient care and must be done on a facility by-facility basis. When a facility has multiple departments with specific

equipment or work practice concerns, evaluations must involve employees from those departments.

Emergency departments should coordinate appropriate medical-device selections with the emergency medical services from which they receive patients. Example of a case in which it would be useful to coordinate: an ambulance service using a needless system not compatible with the needless system used by personnel at a hospital can increase employee exposure potential.

After a device is evaluated and selected, the employer must decide whether to use that device. If a device is not purchased because of employer or employee concerns, those concerns must be documented. However, if the employer does not purchase a device that had employee support, the employer must document the employee support as well as the justification for not purchasing that device.

If a device is purchased without the consent of the employees who evaluated it, the employer must document the employees' concerns as well as the employer's justification for purchasing that device. Required documentation must be kept as part of the written exposure control plan.

The employer must ensure that all affected employees are informed on the process for selecting safer medical devices. All employees must be trained in the use of

safer medical devices before the employees use those devices.

Proper work practices alter the way a task is performed. In work areas where a reasonable likelihood of occupational exposure exists, work practice controls include restricting eating, drinking, smoking, applying cosmetics or lip balm, and handling contact lenses; prohibiting mouth pipetting; preventing the storage of food and/or drink in refrigerators or other locations where blood or OPIM are kept; providing and requiring the use of hand washing facilities; and routinely checking equipment and decontaminating it prior to servicing and shipping.

Washing hands when gloves are removed and as soon as possible after skin contact with blood or other potentially infectious materials is required.

The standard prohibits recapping, removing, or bending needles unless the employer can demonstrate that no alternative is feasible or that such action is required by a specific medical procedure. When recapping, bending, or removing contaminated needles is required by a medical procedure, it must be done using a one-handed technique or by mechanical means such as the use of forceps.

The standard also prohibits shearing or breaking contaminated needles.

**Q. Are contaminated sharps defined?**

- A. Yes. The rule defines contaminated sharps as any contaminated object that can penetrate the skin, including - but not limited to - needles, scalpels, broken glass, broken capillary tubes, and exposed ends of dental wire.

**Q. What must I do with contaminated disposable sharps?**

- A. Sharps must be placed immediately (or as soon as feasible after use) in a puncture resistant, leakproof sharps container that can be closed for handling, storage, transportation, and disposal. The container must be red and may be labeled with the "biohazard" symbol.

**Q. Where are sharps containers required?**

- A. Sharps containers are considered an engineering control and must be located where sharps are used. Containers should be in each room where sharps are used; however, containers may be placed on a tray and transported to each room for use. Disposable and reusable sharps such as large-bore needles, scalpels, and saws must be contained in a manner that eliminates or minimizes the hazard until they are disposed of or reprocessed.

**Q. If I've never had an employee experience a needlestick, do I still need to use safer devices?**

- A. Yes. OSHA standards are designed to prevent occupational injuries and illnesses. In order to most effectively avoid percutaneous injuries from contaminated sharps, employees must use engineering controls that include safer medical devices.

**Q. By what date do we have to implement safer medical devices?**

- A. The requirement to implement safer medical devices is not new. However, the revised standard clarifies, "engineering controls" described in the original 1991 bloodborne pathogens standard by adding language to the definition section of the standard that reflects the development and availability of safer medical devices. The 1991 standard states: "engineering and work practice controls shall be used to eliminate or minimize employee exposure." The revision defines engineering controls as "controls that isolate or remove the bloodborne pathogens hazards from the workplace." Examples include sharps disposal containers, self-sheathing needles, sharps with engineered sharps injury protections and needleless systems. If you have not already evaluated and implemented appropriate and available engineering controls, you must do so now. Also, employees with occupational exposure to blood and/or OPIM must be trained regarding the proper use of all engineering and work controls.

**Q. What if a safer option is not available for the medical device that I use?**

- A. A key element in choosing a safer medical device, other than its effectiveness and appropriateness to the procedure, is its availability on the market. If there is no safer medical device available, you are not required to use something other than the device normally used. During your annual review of devices, you must investigate new and safer options and document this fact in your written exposure control plan. If no engineering control is available, work-practice controls must be used and, if occupational exposure remains, personal protective equipment must also be used.

## Q. Is recapping needles permissible?

- A. Recapping, bending, or removing needles is permissible only if there is no feasible alternative or if required for a specific medical procedure such as blood gas analysis. If recapping, bending, or removal is necessary, workers must use a mechanical device or a one-handed technique. If recapping is essential -- for example, between multiple injections for the same patient -- employees must avoid using both hands to recap. Recapping, using the needle itself to pick up the cap, can be done using a one-handed "scoop" technique, pushing the cap and sharp together against a hard surface to ensure a tight fit. An alternative is to hold the cap with tongs or forceps to place it on the needle.

## Q. Is handwashing addressed in the rules?

- A. Yes. The rule requires employers to provide readily accessible handwashing facilities, where employees are required to wash their hands immediately or as soon as feasible after removal of gloves or other PPE. Any portion of an employee's body that has contacted blood or other potentially infectious materials, including saliva, must be washed immediately or as soon as feasible after contact. When handwashing facilities are not feasible, such as in an ambulance, an antiseptic hand cleanser and clean towels are acceptable, or the employer must provide antiseptic towelettes. The hands must be washed with soap and running water as soon as feasible after reaching hand-washing facilities. Alternate hand-washing procedures for healthcare workers can be found in the Centers for Disease Control and Prevention's Guidelines for Hand Hygiene in Health-Care Settings.

## Personal Protective Equipment (PPE)

### 29 CFR 1910.1030(d)(3)

PPE must be used if engineering and work practice controls do not eliminate the exposure hazard or if such controls are not feasible.

PPE helps prevent occupational exposure to infectious materials. Such equipment includes gloves, gowns, laboratory coats, face shields or masks, and eye protection. PPE is considered appropriate only if it prevents blood or OPIM from passing through or reaching the employee's work clothes, street clothes, undergarments, skin, eyes, mouth, or other mucous membranes under normal conditions of use.

Under the standard, employers must provide, make accessible, and require the use of PPE at no cost to employees. PPE must be provided in appropriate sizes. Hypoallergenic gloves or similar alternatives must be made available to employees who have an allergic sensitivity to gloves. Employers must ensure that protective equipment is properly used, cleaned, laundered, repaired, or replaced, as needed.

An employee may temporarily and briefly decline to wear PPE under extraordinary (usually, life threatening) circumstances and when, in the employee's professional judgment, it prevents the delivery of health care or public safety services or poses an increased hazard to workers. In general, appropriate PPE is expected to be used whenever occupational exposure may occur.

The employer also must ensure that employees observe the following precautions for safely handling and using PPE:

- remove protective equipment when contaminated and before leaving the work area;

## Personal Protective Equipment (continued)

- place used PPE in designated areas or containers for storage, washing, decontamination, or discarding.;
- wear appropriate gloves if there is a reasonable hazard of contact with blood or OPIMs when performing vascular access procedures or touching contaminated items;
- replace gloves if torn, punctured, contaminated, or no longer function as a barrier for other reasons;
- only decontaminate utility gloves for reuse if their integrity is not compromised;
- discard utility gloves when punctured, cracked, peeling, torn, or deteriorated;
- never wash or decontaminate disposable gloves for reuse;
- wear face and eye protection such as a mask with glasses and solid side-shields or a chin-length face shield whenever splashes, sprays, spatters, or droplets of blood or OPIM may reach the eyes, nose, or mouth;
- remove garments when saturated with blood or OPIM; and
- wear protective body coverings such as gowns, aprons, caps, and boots when occupational exposure is anticipated. (The type and characteristics will depend upon the task and degree of exposure anticipated.)

### **Q. Are gloves required when giving allergy immunotherapy injections?**

A. Gloves are not necessary if hand contact with blood or OPIM is not anticipated. If bleeding is anticipated, and the employee is required to clean the site following injection, gloves must be worn. To prevent employee hand contact with blood, the patient can be instructed to apply pressure to the injection site with an alcohol wipe or cotton ball, which the patient discards.

### **Q. Are there standards that define such PPE terms as fluid-proof, fluid-resistant, and permeability?**

A. No. There are no standards defining the permeability of PPE. Paragraph (d)(3)(i) of the standard states: "Personal protective equipment will be considered 'appropriate' only if it does not permit blood or other potentially infectious materials to pass through to or reach the employee's work clothes, street clothes, undergarments, skin, eyes, mouth, or other mucous membranes under normal conditions of use and for the duration of time which the protective equipment will be used."

### **Q. Are latex gloves acceptable for all types of jobs?**

A. No. The employer has the responsibility for determining the type of glove required for each job. Vinyl or other leak-proof gloves may be required to withstand heavier work duties.

### **Q. Is the use of hand or barrier creams acceptable when using latex gloves?**

A. Yes, if the barrier cream does not cause degradation of the gloves, as petroleum-based creams can.

**Q. If employees wear scrubs in work areas where there are exposures to blood and other potentially infectious materials, do they have to remove the scrubs to go down the hall to the rest room?**

- A. Yes. Removing contaminated scrubs prior to leaving the work area is necessary to prevent contamination of other areas. The term "contaminated" means the presence or the reasonably anticipated presence of blood or other potentially infectious materials.

## Housekeeping

**29 CFR 1910.1030(d)(4)**

Under the standard, each place of employment must be clean and sanitary. Employers must develop and implement a cleaning schedule that includes the methods of decontamination and the procedures to use. The cleaning schedule must explain which areas and surfaces are to be cleaned, the type of contamination present, and how they are to be cleaned.

Employers must ensure that these housekeeping procedures are followed:

- clean and decontaminate the environment, including equipment and work surfaces that have been contaminated with blood or OPIM;
- decontaminate work surfaces with an appropriate disinfectant after completing procedures, after spills of blood or OPIM, at the end of work shifts, or immediately, if obviously contaminated; after spills of blood or OPIM;
- remove and replace protective coverings such as plastic wrap and aluminum foil when contaminated;
- regularly inspect and decontaminate reusable receptacles such as bins, pails, and cans that are likely to become contaminated;

- use tongs, forceps, or a brush and a dustpan to pick up contaminated broken glass;
- storage or process reusable sharps in a way that ensures safe handling;
- use closable, leak-proof containers labeled or color-coded for "other regulated waste" storage, (e.g., liquid or semi-liquid blood or OPIM; items contaminated with blood or OPIM that would release these substances in a liquid or semi-liquid state if compressed; items cakes with dried blood or OPIM capable of releasing these materials during handling; contaminated sharps; and pathological and microbiological wastes containing blood or OPIM);
- place discarded contaminated sharps in labeled or color-coded containers that are closable, puncture-resistant, and leak-proof on the sides and bottom;
- make sharps containers easily accessible to employees and as close as possible to the area where sharps are used;
- keep sharps containers upright during use, never overfilled, closed when moved, and replaced if cracked or punctured;
- prohibit the manual opening, emptying, or cleaning of reusable sharps;
- handle contaminated laundry as little as possible and always with the appropriate PPE; and
- do not sort or rinse wet contaminated laundry, but place it in labeled or color-coded, leak-proof containers for transporting,



**Q. Are employees allowed to take gowns, lab coats, or PPE home to be laundered?**

- A. No. Section (d)(3)(iv) of the standard places the responsibility on the employer for cleaning, laundering, and disposal of PPE. This procedure is intended to reduce employee exposure to bloodborne pathogens.

**Q. If an employee accidentally gets blood or OPIM on his or her uniform, is the employer responsible for cleaning that uniform?**

- A. Not necessarily. The employer's responsibility for cleaning items used in the work area is based on the intended function of those items. If a uniform is to function as PPE, then it is the employer's responsibility to provide, clean, replace, and dispose of the uniform.

**Q. Are there special handling requirements for PPE to be laundered?**

- A. Yes. Contaminated (soiled with blood or OPIM) laundry, must be handled as little as possible and placed promptly into bags or containers in the area where it was used, worn, and removed. The bags or containers must prevent leakage and must be red or labeled with the biohazard symbol. If the facility practices universal precautions, other labeling or color-coding is acceptable if it lets all employees recognize the laundry bags or containers as meeting universal precautions. Protective gloves and other PPE must be worn when handling contaminated laundry.

**Q. What disinfectants are acceptable for decontaminating surfaces?**

- A. Products registered by the EPA as sterilants (List A), disinfectants that are effective against tuberculosis (List B), and disinfectants that are effective against Hepatitis B and HIV (List D). These lists are available from the EPA at [www.epa.gov/oppad001/chemregindex.htm](http://www.epa.gov/oppad001/chemregindex.htm).

A solution of 5.25 percent sodium hypochlorite (household bleach) diluted 1:10 to 1:100 with water and prepared daily is acceptable for cleanup of contaminated items or surfaces. Quaternary ammonia products are appropriate for general housekeeping procedures that do not involve the clean up of contaminated items or surfaces. "Contaminated" is defined as the presence or reasonably anticipated presence of blood or OPIM.

**Q. Is carpeting an acceptable floor covering in medical examination rooms or other areas that may become contaminated with blood or OPIM?**

- A. The regulations do not address requirements for floor covering; however, the floor surface or covering must be capable of being cleaned and decontaminated. Some carpet surfaces may be difficult to decontaminate.

**Q. Is there a standard reference that I can follow for decontamination procedures?**

- A. Yes. These procedures are found in the Centers for Disease Control's (CDC), Guidelines for Hand Hygiene in Health-Care Setting, October 25, 2002/51 (RR16): 1-44. This publication can be found on the CDC website at [www.cdc.gov/mmwr/PDF/rr/rr5116.pdf](http://www.cdc.gov/mmwr/PDF/rr/rr5116.pdf) or by calling (404) 639-3286.

## **Q. What wastes are regulated?**

A. Regulated waste includes:

- blood in liquid or semi-liquid form OPIMs, including saliva in dental procedures;
- items that would release blood or OPIMs if compressed;
- contaminated sharps;
- pathological and microbiological waste containing blood or OPIMs;
- items that are caked with dried blood or OPIMs that have the ability to release these materials while being handled.

## **Q. Are feminine hygiene products defined as regulated waste?**

A. OSHA does not generally consider discarded feminine hygiene products used to absorb menstrual flow to be regulated waste. OSHA expects the waste containers in which these products are discarded to be lined in such a way as to protect employees from physical contact with the contents.

## **Q. Are bandages and vaginal speculums considered regulated waste?**

A. Bandages that are not saturated to the point of releasing blood or OPIM if compressed are not considered regulated wastes. Similarly, vaginal speculums do not meet the criteria for regulated wastes as defined by the standard.

## **Q. Are there special handling procedures for regulated waste?**

A. Yes. Contaminated sharps must be disposed of in approved containers. Other regulated waste must be placed in properly labeled or red bags that contain all contents and prevent leakage.

The bags or containers must be closed prior to removal. If a bag leaks or becomes

contaminated on the outside, it must be placed in a second labeled and/or red bag or container.

## **Q. Are there requirements other than the OSHA bloodborne pathogens standard that govern biohazardous or regulated waste?**

A. Yes. The rule requires disposal of regulated waste in accordance with state, local, or federal waste disposal standards. The Texas Department of State Health Services (DSHS) regulates storage and collection, the Texas Department of Transportation (TxDOT) regulates transportation, and the Texas Commission on Environmental Quality (TCEQ) regulates disposal of biohazardous wastes.

## **Labeling & Exposure Incidents**

### **29 CFR 1910.1030(g)**

The standard requires that warning labels in fluorescent orange or orange-red with lettering and symbols in a contrasting color are attached to containers of regulated waste, to refrigerators and freezers containing blood and OPIMs, and to other containers used to store, transport, or ship blood or OPIMs.

Labels are not required when red bags or red containers are used; containers of the contents of blood, blood components, or blood products are labeled and have been released for transfusion or other clinical use; and individual containers of blood or OPIM are placed in a labeled container during storage, transport, shipment, or disposal.

The warning label must be fluorescent orange or orange-red, must contain the biohazard symbol and the word BIOHAZARD in a contrasting color, and must be attached to each object by string, wire, adhesive, or another method to prevent loss or removal of the label.

### **29 CFR 1910.1030(f)**

The standard requires immediate post-exposure medical evaluation and follow-up for employees who have an exposure incident.

# Labeling Requirements

<b>Item</b>	<b>No labels required (if universal precautions are used and container's use is known to all employees)</b>	<b>Biohazard label</b>		<b>Red container</b>
Regulated waste container (e.g., contaminated sharps containers)		YES	Or	YES
Reusable contaminated sharps container (e.g., surgical instruments soaking in a tray)		YES	Or	YES
Refrigerator/freezer holding blood or other potentially infectious material		YES	Or	
Containers used for storage, transport, or shipping of blood		YES	Or	YES
Blood/blood products for clinical use	YES	YES	Or	
Individual specimen containers of blood or other potentially infectious materials remaining in facility	YES	YES	Or	YES
Contaminated equipment needing service (e.g., dialysis equipment; suction apparatus)		YES, plus a label specifying where the contamination exists		
Specimens and regulated waste shipped from the primary facility to another facility for service or disposal		YES	Or	
Contaminated laundry	*Or	YES	Or	
Contaminated laundry sent to another facility that does not use universal precautions		YES	Or	
*Alternative labeling or color coding is sufficient if it permits all employees to recognize containers as requiring compliance with universal precautions.				

**Q. What is an occupational exposure incident?**

- A. It's an employee's exposure to or contact with blood or OPIM through broken skin; through the eyes, nose, or mouth; or by a wound such as a needlestick.

**Q. What must be done if an exposure incident occurs?**

- A. An evaluation and follow-up must be done, which includes the following elements:
- documentation of the route of exposure and how exposure occurred;
  - identification of the source individual, unless the employer can establish that identification is infeasible or prohibited by state or local law;
  - obtain consent from the source individual or show that legally required consent could not be obtained, at which time source individual's blood, if available, should be tested and the results documented;
  - test to determine HIV and HBV infectivity as soon as possible after the incident and document the source individual's blood test results;
  - if the source individual is known to be infected with either HIV or HBV, testing need not be repeated;
  - provide the source individual the test results (if consent obtained) and information about disclosure and confidentiality laws;
  - upon consent, test the exposed employee's blood for HBV and HIV serological status as soon as feasible after the exposure incident;
  - if the employee consents to baseline

blood collection, but does not give consent at that time for HIV serologic testing, the sample shall be preserved for at least 90 days;

- if, within 90 days of the exposure incident, the employee elects to have the baseline sample tested, such testing shall be done as soon as feasible; and
- providing HBV and HIV serological testing, counseling, and safe and effective post-exposure prophylaxis according to recommendations of the U.S. Public Health Service.

The employer must give the health-care professional responsible for the employee's hepatitis B vaccination, post-exposure evaluation and a copy of the OSHA standard. The employer must provide the following to the health-care professional:

- a description of the employee's job duties relevant to the exposure incident;
- documentation of the route(s) of exposure;
- circumstances of exposure;
- results of the source individual's blood tests, if available; and
- all relevant employee medical records, including vaccination status.

The health-care professional's written opinion to the employer for post-exposure evaluation must document that the employee has been informed of the results of the medical evaluation and of any medical conditions resulting from the exposure incident that may require further evaluation or treatment. Other diagnoses pertaining to the employee must remain confidential and not be included in the written report. The employer must provide a copy of this report to the employee within 15 days of the evaluation.

The requirements for the medical and training records are discussed in the next section, "Recordkeeping."

**Q. If the employer is also the health care professional, how can the employer maintain post-exposure confidentiality?**

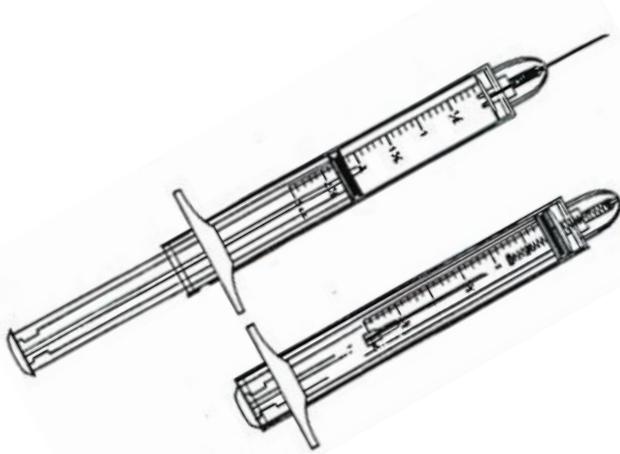
- A. The employer is required to maintain required medical records in a way that protects the employee's identity and test results. If the employer has contracted with a clinic or other health-care facility to provide the follow-up programs, confidentiality requirements must be included in the contract.

## Recordkeeping

**29 CFR 1910.1030(h)**

Employers must preserve and maintain for each employee an accurate record of occupational exposure according to the OSHA standards governing access to employee exposure and medical records, 29 CFR 1910.1020.

Employers who must maintain an exposure-control plan must also maintain a log of injuries from contaminated sharps. This log must protect the confidentiality of the injured employee and must include the type and brand of the device, the department or work area in which the injury occurred, and how the injury occurred. This log must be maintained for five years.



**Q. What information is required to be recorded on the employee medical record?**

- A. Under the bloodborne pathogens standard, medical records must include the following:
- employee's name, social security number, hepatitis B vaccination status including vaccination dates, and any medical records related to the employee's ability to receive vaccinations;
  - results of examinations, medical testing, post-exposure evaluation, and follow-up procedures; and
  - a copy of the information provided to the health-care professional and the health-care professional's written opinion.

**Q. When is an employee exposure to blood or OPIM required to be recorded on the OSHA 300 form?**

- A. All contaminated sharps injuries must be recorded on the OSHA 300 form. All other exposure incidents need only be recorded on the OSHA 300 log when medical treatment is initiated as part of the post-exposure evaluation. These incidents are recorded as injuries until or unless the employee is diagnosed with an illness, such as hepatitis or HIV. If this occurs, the OSHA 300 log must be updated to reflect the incident as an illness, and the description of the incident must reflect the new diagnosis.

All these types of incidents are recorded as privacy-concern cases, in which the name of the employee is kept confidential. If you have a "privacy-concern case," do not enter the employee's name on the OSHA 300 log. Instead, enter "privacy case" in the space normally used for the employee's name. This will protect the privacy of the injured or ill employee when another employee, a former employee, or an authorized employee representative has access to the OSHA 300 log. You must keep a separate, confidential list of the case numbers and employee names for your privacy-concern cases so you can update the cases and provide the information to the government if asked to do so.

**Q. I own a janitorial company, and we have an exposure-control plan because we clean up blood spills. My employees occasionally find used syringes. Do I need to keep a sharps injury log?**

- A. Yes. The sharps injury log must be kept by all employers who must maintain an exposure control plan, regardless of whether they use sharps in their normal duties.

**Q. I must also log injuries from contaminated sharps on my OSHA 300 log. Can I just use that as my sharps injury log?**

- A. Yes, so long as the information required to be kept on the sharps injury log is recorded on the OSHA 300 Log. Additionally, you must be able to easily separate the sharps injury information from all the other information on the OSHA 300 Log. For example, if you keep your 300 Log electronically in a database, you must be able to pull up a report of the sharps injuries with the required information. If you use the paper version of the OSHA 300 Log, you can comply by using a separate sheet for the sharps injuries.

**Q. How long must an employer maintain medical records?**

- A. Medical records must be kept confidential and maintained for at least the duration of employment plus 30 years. The bloodborne pathogens standard also requires employers to keep accurate training records for three years. They must include training dates, contents or a summary of the training, names and qualifications of the trainer or trainers, and names and job titles of trainees. Upon request, both medical and training records must be made available to OSHA, the National Institute for Occupational Safety and Health (NIOSH), and the Texas Department of State Health Services (DSHS). Training records must be available to employees or employee representatives upon request. An employee's medical records can be obtained by that employee or anyone having that employee's written consent.

**Q. What must I do if I decide to close my business?**

- A. If an employer ceases to do business, medical and training records must be transferred to the successive employer. If there is no successive employer, the employer must notify NIOSH, and the U.S. Department of Health and Human Services (DHHS) for specific directions regarding disposition of the records at least three months prior to ceasing company operations.

# PART II

## Bloodborne Pathogens Exposure Control Plan Self-Audit Checklist

### Does the Exposure Control Plan include the following in writing?

NO	YES	Date Completed	
		_____	1. a list of employees who have a likelihood of occupational exposure while performing their assigned duties with or without the use of personal protective equipment;
		_____	2. a schedule and procedures for implementing ALL the provisions of the Standard;
		_____	3. the method for evaluating exposure incidents that allow appropriate corrective action to be taken;
		_____	4. a statement ensuring management solicits input from non-managerial employees to identify and select effective engineering and work practice controls;
		_____	5. a process for reviewing the Exposure Control Plan yearly;
		_____	6. a policy to ensure the Exposure Control Plan is accessible to all employees;
		_____	7. universal precautions to reduce the risk of occupational exposure while handling blood and OPIMs;
		_____	8. engineering controls to reduce occupational exposure;
		_____	9. a schedule for regular inspection and replacement of engineering controls;
		_____	10. a schedule and method to determine when to replace sharps containers;
		_____	11. a statement prohibiting the recapping of needles using a two-handed technique;
		_____	12. a statement prohibiting the removal of needles from syringes by hand;  (continued)

## Does the Exposure Control Plan include the following in writing?

NO	YES	Date Completed	
		_____	13. a statement prohibiting bending, shearing, or breaking of contaminated needles;
		_____	14. a statement specifying when recapping of needles is allowed and the safe practices or devices required to reduce the risk of injury;
		_____	15. a policy specifying the safe practices for handling or reprocessing reusable sharps;
		_____	16. the requirement to use mechanical means -- such as a brush and dustpan or tongs -- to clean up broken glassware;
		_____	17. a policy ensuring handwashing facilities with soap and running water are reasonably accessible to employees, and if not accessible, appropriate alternatives, such as antiseptic hand cleansers or towelettes are provided;
		_____	18. instructions to employees about not eating, drinking, smoking, applying cosmetics or lip balm, or handling contact lenses in contaminated work areas; and
		_____	19. a statement prohibiting food and drink storage in refrigerators, freezers, shelves, cabinets, or countertops where blood and OPIMs are present.

## Do sharps containers comply with the following?

NO	YES	Date Completed	
		_____	1. containers are closeable, puncture-resistant and leakproof on sides and bottom;
		_____	2. containers are red in color and labeled with the BIOHAZARD symbol;
		_____	3. containers are located as close as possible to the immediate area of use;
		_____	4. containers are in areas, such as the laundry, where sharps may not normally be used, but can be reasonably be needed;
		_____	5. containers are replaced routinely and not allowed to overfill; and
		_____	6. containers are maintained in an upright position during transport.

## Does employee training include the following?

<b>NO</b>	<b>YES</b>	<b>Date Completed</b>	
		_____	1. recognize specimen containers as holding potentially infectious materials;
		_____	2. use universal precautions when handling all specimens, and if not, use red containers or those labeled with the BIOHAZARD symbol;
		_____	3. appropriately label containers used to transport medical specimens;
		_____	4. place all potentially contaminated or leaking specimen containers in a secondary container that is leak-resistant or, if necessary, puncture-resistant;
		_____	5. decontaminate contaminated equipment prior to servicing;
		_____	6. label and specify which portions of the equipment remain contaminated, if unable to decontaminate;
		_____	7. procedures to reduce the risk of exposure during duties that may create splashing or spraying of blood or OPIMs;
		_____	8. mechanisms for repairing, replacing, and reprocessing protective barriers and clothing;
		_____	9. use of barrier devices in emergency CPR;
		_____	10. procedures to select, indicate, and mandate the use of disposal or reprocessing of personal protective equipment;
		_____	11. review of employee job duties with occupational exposure to determine what protective clothing must be provided;
		_____	12. methods for selecting, using, replacing, and disposing of protective clothing;
		_____	13. removal of protective clothing before leaving the work area and when penetrated by blood and OPIMs;
		_____	14. mechanisms to provide training to all current employees as soon as possible and to new employees at the time of initial employment;
			(continued)

## Does employee training include the following?

<b>NO</b>	<b>YES</b>	<b>Date Completed</b>	
		_____	15. training all employees with potential occupational exposure at no cost during working hours at an accessible location by an individual who is knowledgeable in the subject matter;
		_____	16. policies to maintain training records for three years from the date of the training, which include dates of the training sessions and the contents or a summary of the training;
		_____	17. accessible copies of the regulatory text of the Standard give to all employees;
		_____	18. explanation of the epidemiology and symptoms of bloodborne diseases;
		_____	19. explanation of the modes of transmission of bloodborne pathogens;
		_____	20. explanation of the employer's Exposure Control Plan and the means by which the employee can obtain a copy of the written plan;
		_____	21. explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and OPIMs;
		_____	22. explanation of the use and limitations of methods that prevent or reduce exposure, including appropriate engineering controls, work practices, and personal protective equipment;
		_____	23. information on the types, proper use, location, removal, handling, decontamination, and disposal of personal protective equipment;
		_____	24. explanation of the basis for selecting personal protective equipment;
		_____	25. information on the Hepatitis B vaccine, including information on its efficacy, safety, method of administration, benefits, and cost (offered free of charge);
		_____	26. information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIMs;  (continued)

## Does employee training include the following?

NO	YES	Date Completed	
		_____	27. explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be available;
		_____	28. information on the post-exposure evaluation and follow-up required to provide an employee following any exposure incident;
		_____	29. explanation of the signs, labels, or color coding used to identify hazards;
		_____	30. opportunities for interactive questions and answers with the person conducting the training;
		_____	31. training offered in appropriate content, language, vocabulary, education, and literacy background of the employee;
		_____	32. mechanisms to ensure that medical records are kept confidential; and
		_____	33. policies to ensure employees have access to their medical records.

## Is personal protective clothing provided?

NO	YES	Date Completed	
		_____	1. at no cost, in appropriate sizes, and in accessible locations;
		_____	2. that is effective in preventing the penetration of blood and OPIMs;
		_____	3. includes methods for cleaning, laundering, or disposing of employees' protective clothing and for replacing or washing employee-owned uniforms or clothing that becomes contaminated.

## Are appropriate gloves available?

NO	YES	Date Completed	
		_____	1. in accessible locations that are appropriate for the tasks performed;
		_____	2. available in alternative materials to employees who are allergic to those normally provided;
		_____	3. when there is a reasonable likelihood of contact with blood and OPIMs;
		_____	4. during all vascular access procedures;
		_____	5. when there is contact with mucous membranes and non-intact skin; and
		_____	6. when contaminated items or surfaces are handled.

## Is appropriate face and eye protection available?

NO	YES	Date Completed	
		_____	1. when there is a potential for splashing, spraying, or splattering of blood or OPIMs; and
		_____	2. if glasses are used as protective eyewear, protective shield are available and used.

## Do policies for cleaning and decontamination include the following?

<b>NO</b>	<b>YES</b>	<b>Date Completed</b>	
		_____	1. environmental surfaces (such as floors), work surfaces; and equipment;
		_____	2. reusable trash receptacles that hold contaminated items;
		_____	3. regular schedule for inspection and decontamination of containers;
		_____	4. procedures for cleaning and decontaminating items visibly contaminated;
		_____	5. procedures for identifying, bagging, handling, and transporting contaminated laundry;
		_____	6. prohibiting the sorting or rinsing of contaminated laundry in guest areas;
		_____	7. specifying the types of laundry bags or containers used to prevent leakage;
		_____	8. specifying the alternative labeling when universal precautions are used for handling all contaminated laundry;
		_____	9. identifying closeable containers for regulated waste that prevent leakage of fluids and are labeled with the BIOHAZARD symbol or are colored red;
		_____	10. training employees in closing all regulated waste containers prior to removal to prevent spillage;
		_____	11. policies and procedures to identify the responsibility of department heads, managers and employees in complying with the recommended practices, including: <ul style="list-style-type: none"> <li>• the responsibility of the employee;</li> <li>• how compliance monitoring is done;</li> <li>• how non-compliance is reported and documented;</li> <li>• how follow-up is conducted; and</li> <li>• the action taken for noncompliance, such as disciplinary action, if necessary.</li> </ul>

## Do policies and specific training for the hepatitis B vaccine include the following?

<b>NO</b>	<b>YES</b>	<b>Date Completed</b>	
		_____	1. a determination of which employees have potential occupational exposure and are eligible for a hepatitis B vaccination;
		_____	2. a policy to ensure that all employees with potential occupational exposure are provided the hepatitis B vaccine free of charge, at a reasonable time and place convenient to the employee, and in accordance with U.S. Public Health Service recommendations;
		_____	3. a method to offer the hepatitis B vaccine to current employees and new employees within ten days of their initial job assignment;
		_____	4. specific training provided prior to vaccination that includes the efficacy, safety, benefits, and methods of administration of the hepatitis B vaccine;
		_____	5. information on employees' rights to decline a vaccination and to still have it provided upon request later;
		_____	6. a declination statement for employees to sign who decline vaccination;
		_____	7. a method to obtain a written opinion from the evaluating health care professional on the vaccination status of each employee and a policy to provide a copy of this written opinion to the employee;
		_____	8. a method to ensure all other employee health records containing medical findings and diagnoses are kept confidential;
		_____	9. records of the vaccination status of all employees who have a potential occupational exposure are maintained;
		_____	10. a clear definition of exposure incidents;
		_____	11. a method to document the route(s) of exposure and circumstances under which all exposure incidents occur;
		_____	12. a mechanism to evaluate exposure incidents to allow corrective action; (continued)

## Do policies and specific training for the hepatitis B vaccine include the following?

<b>NO</b>	<b>YES</b>	<b>Date Completed</b>	
			13. a confidential medical evaluation and follow-up provided immediately following exposure incidents that includes: <ul style="list-style-type: none"> <li>• evaluation of the exposure incident;</li> </ul>
			<ul style="list-style-type: none"> <li>• collection and testing of the source individual's blood for HBV and HIV serological status, if not already known;</li> </ul>
			<ul style="list-style-type: none"> <li>• post-exposure prophylaxis when medically indicated, as recommended by the U.S. Public Health Service at the time of the exposure;</li> </ul>
			<ul style="list-style-type: none"> <li>• counseling; and</li> </ul>
			<ul style="list-style-type: none"> <li>• evaluation of any reported illnesses related to the exposure incident;</li> </ul>
			14. information on the results of the source individual's blood testing provided to the employee;
			15. procedures that specify what should be done if consent cannot be obtained from the source individual;
			16. baseline blood samples from exposed employees who initially decline HIV testing are held for 90 days and a policy is provided for testing these samples from the source individual;
			17. information from the evaluating health care professional, which includes: <ul style="list-style-type: none"> <li>• a copy of the Standard;</li> </ul>
			<ul style="list-style-type: none"> <li>• a description of the exposed employee's duties as they relate to the exposure incident;</li> </ul>
			<ul style="list-style-type: none"> <li>• documentation of the route(s) of exposure and circumstances under which the exposure occurred;</li> </ul>
			<ul style="list-style-type: none"> <li>• results of the source individual's blood testing, if available; and</li> </ul>
			<ul style="list-style-type: none"> <li>• all medical records relevant to treatment of the employee including vaccination status;</li> </ul> <p>(continued)</p>

## Do policies and specific training for the hepatitis B vaccine include the following?

NO	YES	Date Completed	
		_____	18. employer-provided copy of the evaluating health care professional's written opinion, which includes information about: <ul style="list-style-type: none"><li>• the results of the medical evaluation; and</li></ul>
		_____	<ul style="list-style-type: none"><li>• any medical conditions that may arise from exposure that may require further treatment;</li></ul>
		_____	19. needlestick injuries and other exposure incidents that result in medical treatment or seroconversion recorded on the OSHA-USA 300 Log or local summary of occupational injuries or illnesses; and
		_____	20. a policy that ensures identifying information related to bloodborne pathogens are removed prior to granting access to the records.

## Are there written procedures that outline the following specific labeling requirements?

NO	YES	Date Completed	
		_____	1. specimens, if universal precautions are not observed for handling all specimens;
		_____	2. laundry bags if universal precautions are not observed for handling all laundry;
		_____	3. refrigerators and freezers that contain blood or other potentially infectious materials;
		_____	4. containers used to store, transport, or ship regulated waste, blood, OPIMs;
		_____	5. sharps disposal containers; and
		_____	6. contaminated equipment sent for servicing or repair.

# APPENDIX A:

## Sample Statement of Declination

The following statement must be signed by every employee who declines the hepatitis vaccine. The statement can only be signed by the employee after receiving training regarding hepatitis B, hepatitis B vaccination, and the method and benefits of vaccination. Employees must be told that the vaccine and vaccination are provided free of charge to the employee. The statement is not a waiver. Employees can request and receive the hepatitis B vaccination later if they remain occupationally at risk for hepatitis B.

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with hepatitis B vaccine at no charge to myself. However, I decline hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Employee Signature \_\_\_\_\_ Date \_\_\_\_\_

# APPENDIX B:

## Bloodborne Pathogens Exposure Control Plan

### SAMPLE:

Facility name: \_\_\_\_\_ Date of preparation: \_\_\_\_\_

We, the management of \_\_\_\_\_, are committed to preventing incidents that cause employee injury and illness. We are also committed to complying with the OSHA Bloodborne Pathogens Standard, 29 CFR 1910.1030. Through this written exposure control plan, we share assigned responsibility and hereby adopt this exposure control plan as part of our company's safety and health program.

### A. Purpose

The purposes and goals of this exposure control plan:

1. to eliminate or minimize employee occupational exposure to blood or other potentially infectious materials (OPIM);
2. to identify all employees who are potentially exposed to blood or OPIMs while performing their regular job duties;
3. to provide employees who are occupationally exposed to blood and OPIMs with information and training;
4. to ensure a copy of this plan is available to all employees at (location); and
5. to comply with the OSHA Bloodborne Pathogen Standard, 29 CFR 1910.1030.

### B. Exposure determination

(Name of organization) has performed an exposure determination for all common job classifications that may potentially incur occupational exposures to blood or OPIM. This exposure determination is made without regard to personal protective equipment (PPE) use. The following job classifications -- see section (c)(2) -- may be expected to incur occupational exposures to blood or OPIMs:

Job classification	Task or procedure
_____	_____
_____	_____
_____	_____

## C. Compliance methods

### 1. Universal precautions

This organization embraces “universal precautions,” which is a method of infection control that requires the employer and employee to assume that all human blood and specified human body fluids are infected with bloodborne pathogens. Where it’s difficult or impossible to identify body fluids, all are to be considered potentially infectious.

# APPENDIX C:

## Engineering and work practice controls

The following engineering and work practice controls will be used by all employees to eliminate or minimize occupational exposures at this facility:

### **Occupationally exposed**

Occupationally exposed means exposed during the performance of job duties to blood or OPIM through skin, eyes, mucous membranes, or broken skin by needle sticks, human bites, cuts, abrasions, splashes, or other means.

### **Sharps containers**

Place contaminated needles, blood-contaminated test tubes, and other sharp objects in a sharps container. Replace containers routinely and do not allow overfilling. Place reusable sharps in metal trays for decontamination. When moving containers of contaminated sharps from the area of use, close containers to prevent spillage or protrusion of contents.

### **Safe medical devices**

Purchase and use safe medical devices whenever possible. Evaluate devices annually to determine appropriateness of the device and to investigate new and safer options.

### **Work practices**

Clean-up blood spills or body fluids as soon as possible. Use disposable absorptive materials, such as paper towels or gauze pads to soak up the fluids. Clean the area with chemical germicides or a 1:10 solution of liquid bleach. Place absorptive towels, pads, and other material used to mop up spills in plastic bags or designated, labeled containers and treat as biohazardous waste.

Employees must wash their hands upon removal of gloves and other protective gear. In an emergency, if soap and water are not immediately available, use disposable antiseptic towelettes or germicidal gel to clean hands after removing gloves.

Employee must wash their hands with soap and water as soon as possible.

Employees may not eat, drink, smoke, apply cosmetics or lip balm, or handle contact lenses where occupational exposure can occur. Do not store food or beverages in refrigerators and freezers and other sites used to store blood or other biohazardous material. Place biohazard labels on refrigerators or freezers used to store biohazardous material.

### **Personal protective equipment (PPE)**

PPE is provided at no cost to employees. Employees receive training in its use, maintenance, and disposal annually.

### **Storage area**

The first-aid kits are in the following locations:

## **Storage area (continued)**

In case of emergency, take the necessary first-aid kit and supplies, including PPE, to the location of the injured person. Supplies should include disposable gloves; face shields; resuscitation devices; large, heavy-duty plastic bags and ties; biohazard signs or labels; antiseptic towelettes; disposal absorptive material for cleaning up spilled blood; gloves; and bleach solutions or germicides.

## **PPE use and disposal**

Employees engaging in activities that may involve direct contact with blood, OPIM, contaminated objects, mucous membranes or open wounds must wear disposal gloves made of vinyl or latex. Use reusable rubber gloves (inspected and free of apparent defects) or disposable gloves to clean up spill areas. Disinfect reusable gloves with diluted liquid bleach or germicides after use.

Wear face shields or goggles with disposable surgical masks whenever splashes, spray, spatters of blood droplets, or OPIMs may be generated and eye, nose, or mouth contamination can be reasonably anticipated.

Use laboratory coats or scrubs at the first-aid center to prevent contamination of employee street clothing.

Use resuscitation devices, which minimize contact with mucous membranes, to perform cardiopulmonary resuscitation. Remove used personal protective equipment at the exposure location or as soon as feasible to avoid contamination of other work area.

Place in a biohazard container or in a plastic bag with a biohazard label. PPE must not be taken from the worksite.

## **Housekeeping**

Maintain the first-aid kit in a clean and sanitary condition. Employees who have received bloodborne pathogen training and who have been included under the exposure plan can clean up spills and work surfaces such as bench tops and blood processing areas. Clean and decontaminate all equipment and working surfaces after completion of procedures in blood processing areas.

Immediately, or as soon as feasibly possible, clean and decontaminate all equipment and working surfaces after completion of procedures in which blood or body fluids contaminated with blood are handled. Clean and decontaminate the area at the end of the work shift if the surface has been contaminated since the last cleaning. Inspect all biohazardous waste receptacles and decontaminate weekly or immediately upon visible contamination.

Use chemical germicides or solutions of 5.25% sodium hypochlorite (liquid bleach) diluted 1:10 with water for cleaning. Chemical germicides approved for use as hospital disinfectants and effective against HIV can also be used. Broken glassware or glass items must not be picked up directly with the hands. Use a mechanical means, such as a brush and dustpan, tongs, or forceps. Handle as a biohazardous waste. Decontaminate equipment used to pick up glassware with a 1:10 bleach solution or an approved germicide.

## **Contaminated laundry**

Handle non-disposal linen, such as laboratory coats or scrubs, or any other clothing, visibly contaminated with blood, using disposal gloves. Minimize the time spent handling laundry by keeping as close as possible to the location where it was used. Place laundry in a bag that prevents soak-through or

## **Contaminated laundry** (continued)

leakage of fluids to the exterior; place a biohazard label on the top of the bag.

Employees are not to take contaminated items home to launder. \_\_\_\_\_

holds the contract to pick up, clean, and return laundered items. The laundry facility has a bloodborne pathogen program in place.

## **Regulated waste**

\_\_\_\_\_ has been contracted to pick up regulated waste for disposal. Place regulated waste in containers that are closable, constructed to contain all contents, and prevent leakage, appropriately labeled or color-coded, and closed prior to removal to prevent spillage or protrusion of contents during handling.

## **Labels and signs**

Affix warning labels to laundry bags, containers of regulated waste, refrigerator units and containers used to store, transport, or ship blood or OPIM. Red bags or red containers can be used instead of labels.

## **Hepatitis B vaccine**

The hepatitis B vaccine is offered, at no cost, to exposed employees within 10 working days of initial assignment. Employees who have potential exposure to bloodborne pathogens but decline to take the vaccination must sign a declination statement. Employees who initially decline can still receive the vaccination should they decide later to accept. Previously vaccinated new hires must provide a vaccination record that includes the vaccination dates. Employees must sign a declination statement if the vaccination record is not available and revaccination is declined or not appropriate. We will coordinate with the \_\_\_\_\_ to administer the vaccination and retain employee medical record files.

## **Exposure incident and post-exposure evaluation and follow-up**

An exposure incident to bloodborne pathogens is defined as an eye, mouth, or other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious materials that results from the performance of an employee's duties. It is our policy to include Good Samaritan acts performed by an employee at the worksite. Whenever an exposure occurs, wash the contaminated skin immediately with soap and water. Immediately flush contaminated eyes or mucous membranes with copious amounts of water.

Medically evaluate exposed employees as soon as possible after the exposure incident. If recommended, post-exposure prophylaxis can be initiated promptly.

The medical evaluation is to include the route(s) of exposure and the exposure incident circumstances; identification and documentation of the source individual, where feasible; exposed employee blood collection and testing of blood for HBV and HIV serological status, post-exposure prophylaxis, where indicated; counseling; and evaluation of reported illnesses. Source test results and identity will be disclosed to the exposed employee according to applicable state and federal laws and regulations concerning disclosure and confidentiality.

The \_\_\_\_\_ provides hepatitis B vaccinations and medical evaluations and post-exposure follow-up after an exposure incident.

## **Training and training records**

All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology symptoms, and mode of transmission of bloodborne-pathogen disease. In addition, the training program will include the following topics:

- an explanation of activities and tasks that may involve exposure to blood and OPIM;
- how appropriate engineering controls, work practices, and PPE will prevent or reduce exposure;
- the basis for the selection of PPE, the types, use, location, removal, handling, decontamination, and disposal procedures;
- hepatitis B vaccine information including that the vaccine is provided at no cost, the benefits of being vaccinated, and methods of administration;
- employer responsibilities for post-exposure evaluation and medical follow-up, including how and who to contact should an exposure incident occur;
- an explanation of the signs and hazard labels; and
- how to review or obtain a copy of the exposure-control plan and the OSHA standard.

Employee training occurs prior to initial assignment to tasks in which occupational exposure may occur. Training is repeated every 12 months or sooner when there are new tasks or changes to the existing procedures or tasks. Training records are maintained for three years and include the date(s) and content of the training program, name and qualifications of the trainer(s), and names and job titles of the attendees.

## **Recordkeeping**

Medical records for employees with occupational exposure to bloodborne pathogens include the employee's name, Social Security number, and hepatitis B vaccination status, including dates of hepatitis B vaccination and any medical records relative to the employee's ability to receive the vaccination. Medical records are kept for the duration of employment plus 30 years in accordance with OSHA standard, 1910-1020. Medical records are confidential and are in the office. In the event of an exposure incident, the following records will be kept in the employee's medical file:

- the results of any examination, medical testing, and follow-up procedures;
- a copy of the testing physician's written opinion to the employer; and
- a copy of all information provided by the employer to the health-care professional regarding the exposure incident.

Record any needle stick, mucous membrane, or skin contact with blood or body fluids contaminated with blood or OPIM requiring medical treatment, for example, gamma globulin, hepatitis B vaccine, etc.) in the OSHA 300 log. In addition, record any contaminated sharp injuries, including needlesticks on the sharps injury log. These records are retained for five years.

## **Plan evaluation and review**

Review of the exposure control plan and update will occur annually and whenever necessary to reflect new or modified tasks and procedures that affect occupational exposure. The \_\_\_\_\_ is responsible for the annual review.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

# **APPENDIX D:**

## **Example of Sharps Injury Log**

**Company name:** \_\_\_\_\_

**Sharps injury log date:** \_\_\_\_\_

29 CFR 1910.1030, OSHA's Bloodborne Pathogens Standard, in paragraph (h)(5), requires an employer to establish and maintain a sharps injury log for recording all percutaneous injuries in a facility occurring from contaminated sharps. The purpose of the log is to aid in the evaluation of devices being used in health care and other facilities and to identify devices or procedures requiring attention or review. The employer must retain this log and the injury-and-illness log required by 29 CFR 1904. The sharps injury log should include all sharps injuries occurring in a calendar year. The log must be retained for five years following the end of the year to which it relates. The log must be kept in a manner that preserves the confidentiality of affected employees.



*Safety Violations Hotline*  
**1-800-452-9595**  
[safetyhotline@tdi.texas.gov](mailto:safetyhotline@tdi.texas.gov)

The Texas Department of Insurance,  
Division of Workers' Compensation (DWC)  
E-mail [resourcecenter@tdi.texas.gov](mailto:resourcecenter@tdi.texas.gov)  
or call 1-800-687-7080 for more information.