

SAFETY POLICY

VU Bloodborne Pathogens Exposure Control Plan

Approval Authority: VU Occupational Safety and Health Committee
Responsible Administrator: Tamara Cooley
Responsible Office: VUPS Division of Occupational Safety and Health
Policy Contact: Tamara Cooley

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POLICY STATEMENT/REASON FOR POLICY

Vanderbilt University is committed to providing a safe and healthful work environment for our faculty, staff, students, and campus visitors. In pursuit of this goal, the following exposure control plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens (BBP) in accordance with OSHA standard 29 CFR 1910.1030, "Bloodborne Pathogens". The ECP is a key document to assist Vanderbilt University in implementing and ensuring compliance with the standard, thereby protecting our employees.

THIS POLICY APPLIES TO

This Policy applies to Vanderbilt faculty, staff, and students that have exposure to bloodborne pathogens as a result of their work on behalf of Vanderbilt University. Part-time, temporary, per diem employees are also covered by this policy. This policy does not apply to individuals not performing work per these definitions, though all environments where BBP exposure is possible are responsible to create and maintain prevention and response plans.

For purposes of this policy, anyone within this scope will be deemed "employees".

POLICY

Employees with exposure to Bloodborne Pathogens during the course of their employment at Vanderbilt University follow the regulatory requirements set forth in the VU Bloodborne Pathogens Exposure Control Plan.

DEFINITIONS

- 1) Bloodborne Pathogens
 - a. Bloodborne pathogens are infectious microorganisms in human blood that can cause disease in humans. These pathogens include, but are not limited to, hepatitis B (HBV), hepatitis C (HCV) and human immunodeficiency virus (HIV).
- 2) Other Potentially Infectious Materials (OPIM)
 - a. 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 body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids;

- b. Any unfixed tissue or organ (other than intact skin) from a human (living or dead); and,
- c. HIV-containing cell or tissue cultures, organ cultures, and HIV- or HBV-containing culture medium or other solutions; and blood, organs, or other tissues from experimental animals infected with HIV or HBV.

3) Universal Precautions

- a. a standard set of guidelines to prevent the transmission of bloodborne pathogens from exposure to blood and other potentially infectious materials (OPIM).

PROCEDURES

A. Program Administration/Responsibilities

1) Vanderbilt University Occupational Safety and Health Committee (VOSH)

- a. Responsible for maintaining, reviewing, and updating the ECP at least annually, and whenever necessary to include new or modified tasks and procedures.
- b. Contact location/phone number for the ECP:
Office of Emergency Management
Division of Occupational Safety and Health (OS&H)
111 28th Ave. South
Nashville, TN 37212
Phone: (615) 566-9158

2) Exposure Control Officers

- a. Serve as the primary contacts for all work environments covered by the scope of this policy.
- b. Oversee implementation of the Exposure Control Policy.
- c. Update the Exposure Control Policy at least on an annual basis through the VOSH Committee.
- d. Assists supervisors and employees in the development and implementation of procedures intended to reduce BBP exposure risk associated with site-specific tasks.
- e. Develops and/or identifies training resources and provide training to the appropriate extent.
- f. Understands current legal requirements concerning bloodborne pathogens.
- g. Conducts periodic audits and inspections of environments where occupational exposure risk is present to verify regulatory compliance.
- h. Contact information:
 - i. For research areas, the Biological Safety Office personnel within the Environmental Health and Safety Department serves as the Exposure Control Officer.
 - ii. For non-research areas, the Division of Occupational Safety and Health personnel within Vanderbilt University Public Safety serve as the Exposure Control Officer.
 - iii. See Additional Contacts section for contact information.

- 3) Supervisory Personnel (including Principal Investigators, Clinical Leaders, Managers and Supervisors):
 - a. Supervisory personnel that have employees who are exposed to BBP and other potentially infectious materials (OPIM) are responsible for the implementation of the ECP in their area.
 - b. Provides and maintains all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard and ensures that adequate supplies of these materials are available in the appropriate sizes.
 - c. Ensures completion and documentation of training. (For training resources, contact the Exposure Control Officer for live and online options).
 - d. Make this policy available to all employees at any time. This includes area-specific information found in Appendix A.
- 4) Vanderbilt Occupational Health Clinic (VOHC):
 - a. Verifies that all medical actions required by the standard are performed and that all appropriate employee health and OSHA records are maintained.
 - b. Responsible for maintaining all medical-related records.
 - c. VOHC phone number (615) 936-0955.
- 5) Employees in the ECP:
 - a. Complies with the procedures and work practices outlined in this ECP.
- 6) VU Employees performing work at VUMC:
 - a. The Vanderbilt University Medical Center (VUMC) ECP supersedes the University ECP when Vanderbilt University (VU) employees provide services to VUMC.
 - b. The VUMC ECP is located in on the VUMC Policy Tech website.

B. Employee Exposure Determination

- 1) VOHC, in collaboration with the Exposure Control Officers, develops and maintains lists of job classifications in which employees have occupational exposure to blood and OPIM and a list of job classifications in which some employees have occupational exposure. The job classification list includes a general list of tasks and procedures in which occupational exposures may occur without regard to use of personal protective equipment (PPE).
- 2) Lists are reviewed/revised annually by the VOHC through their Occupational Health Information System. Periodically, VOHC reviews program groups to consider any relevant changes.
- 3) As supervisory personnel identify a new job code that has occupational exposure to bloodborne pathogens, or an old job code that no longer has exposure, they notify VOHC.
- 4) This list is available through the VOHC's Occupational Health Information System.

C. Engineering and Work Practice Controls

- 1) All employees utilize Universal Precautions when in contact with bloodborne pathogens and OPIM.
- 2) Engineering and work practice controls are used whenever feasible to eliminate or reduce the risk of occupational exposure to blood or OPIM. Engineering controls are examined and maintained or replaced on a regular schedule to verify their effectiveness.

- 3) Specific practices pertaining to engineering controls, personal protective equipment, housekeeping procedures, laundry, and labelling to reduce exposure to BBP are listed in area-specific information found in Appendix A. Supervisory personnel is responsible for reviewing and updating their practices at least annually or whenever practices change.

D. Hepatitis B Vaccination

- 1) Supervisory personnel with employees in the ECP will ensure that affected employees receive training regarding the importance of and process of receiving hepatitis B vaccinations. Specific questions concerning the vaccination, its safety, efficacy, and benefits will be addressed by VOHC at the time of vaccination.
- 2) The hepatitis B vaccination series is available at no cost after initial employee orientation and within 10 days of initial assignment to all employees identified in the exposure determination section of this policy. To promote employee safety, vaccination is strongly encouraged unless documentation exists that the employee has previously received the series or medical evaluation shows that vaccination is contraindicated.
- 3) If an employee declines the vaccination, the employee must sign a declination form. Employees who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the vaccination is kept in the employee's medical file at the VOHC.
- 4) Vaccination will be provided by the Vanderbilt Occupational Health Clinic, 1211 21st Ave South, Suite 640, Nashville, TN 37212.

E. Post-Exposure Evaluation and Follow-Up

- 1) Employees exposed to blood or OPIM must immediately perform the following:
 - a. Wash exposed area with soap and water. If eyes are exposed, remove contact lenses (if applicable) and flush the eyes with water for a minimum of 15 minutes. Do not reinsert lenses prior to medical evaluation.
 - b. Follow procedures, including notification procedures, as listed in Vanderbilt University HR Policy, "Work-related Accident and Return to Work".
 - c. Seek medical care:
 - i. During clinic hours: Contact VOHC by phone or proceed directly to the clinic in Suite 640, Medical Arts Building.
 - ii. After clinic hours:
 1. Contact the VOHC on-call provider at (615) 936-0955. For smaller wounds, the on-call provider will provide guidance and place lab order for the exposed employee.
 2. For large wounds, proceed to the Vanderbilt Adult Emergency Department for immediate evaluation. Contact the VOHC on the next business day so that follow-up care can be initiated.
 - iii. For all exposures: If the source is known, have labs obtained or phone VOHC before the source is discharged or leaves the facility to obtain instructions for testing the source (individual or research specimen) if possible.
- 2) Health Care Professionals provide the following:
 - a. VOHC providers have a copy of the VU Exposure Control Policy and the OSHA regulation.

- b. VOHC clinicians (or Vanderbilt Emergency Department if VOHC is unavailable) provide a confidential medical evaluation and follow-up.
- c. Following the initial first aid, the following activities are performed by VOHC and the information provided to the health care professional responsible for providing the post-exposure evaluation:
 - i. Document how the exposure occurred, and the work area where the exposure occurred and the routes of exposure. Document type, brand/manufacturer, and gauge of sharp involved, if applicable.
 - ii. Identify and document the source individual or research specimen and facilitate testing of the source patient or research specimen for HIV, HBV, and HCV unless such identification and/or testing is not feasible.
 - iii. Facilitate testing of the exposed employee for HIV, HBV, and HCV as per VOHC protocol through an accredited laboratory.
 - iv. VOHC will obtain and provide a copy of the healthcare provider's written opinion to the employee within 15 days of the completion of the evaluation. This provider's written opinion will note that the employee has been informed of the results of the evaluation and any medical conditions resulting from the exposure to blood or other potentially infectious materials which require further evaluation or treatment. Post-exposure management by VOHC and Human Resources (HR) includes post-exposure prophylaxis as indicated by current CDC/United States Public Health Service (USPHS) guidelines, counseling, and evaluation of reported illnesses. Post-exposure medical treatment and counseling may be provided at no cost to the employee.
 - v. Medical records are maintained for each employee for the duration of the employment plus 30 years in accordance with 29 CFR 1910.1030(h)(1). Employee medical records are provided within 15 working days of a request by the employee or by anyone having written consent of the employee. Such requests are made to Medical Records at 615-322-2062.

F. Exposure Incident Evaluation

- 1) VOHC in collaboration with the Exposure Control Officers, reviews the circumstances of exposure incidents to determine engineering controls and work practices used, the device involved, PPE, location of the incident, processes being performed, and status of employee training. This information is used to promote evaluation of safer work practices and revisions in training.
- 2) VOHC and Human Resources (HR) evaluate exposure incidents to determine if the cases meet OSHA record keeping requirements. HR records percutaneous injuries from contaminated sharps in the sharps injury log consistent with requirements under 29 CFR 1904 and 29 CFR 1910.1030.
- 3) A quarterly summary of blood and body fluid exposure is provided to the VOSH annually. Trends are analyzed and recommendations made to the supervisory personnel experiencing higher incident rates as necessary.

G. Employee Training

- 1) All employees who have occupational exposure to bloodborne pathogens receive initial and annual training available through the Oracle Learn (online) or live as conducted by an Exposure Control Officer. Supervisory personnel are responsible for ensuring employees have received training prior to working with BBP and annually thereafter. Questions regarding bloodborne pathogens are directed to an Exposure Control Officer – See Additional Contact Information section for contact information.
- 2) All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at minimum, the following elements:
 - a. a copy and explanation of the OSHA bloodborne pathogen standard
 - b. a copy of the Vanderbilt University ECP and how to obtain a copy
 - c. an explanation of methods for recognizing tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
 - d. an explanation of the use and limitations of engineering controls, work practices, and PPE
 - e. an explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE
 - f. an explanation of the basis for PPE selection
 - g. information on the hepatitis B vaccine. (Specific questions concerning the vaccination, its safety, efficacy, and benefits will be addressed by VOHC at the time of vaccination)
 - h. information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM
 - i. an 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 made available
 - j. information on the post exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
 - k. an explanation of the signs and labels and/or color coding required by the standard and used at Vanderbilt University
 - l. an opportunity for interactive questions and answers with the person conducting the training session.
- 3) Training records are completed for each employee upon completion of training. These documents will be kept for at least three years by supervisory personnel. The training records include:
 - a. the dates of the training sessions
 - b. the contents or summary of the training sessions
 - c. the names and qualifications of persons conducting the training
 - d. the names and job titles of all persons attending the training sessions
- 4) Employee training records are provided within 15 working days of a request by the employee or the employee's authorized representative. Requests addressed to:
Office of Emergency Management
Division of Occupational Safety and Health
111 28th Ave. South
Nashville, TN 37212
Phone: (615)566-9158

FREQUENTLY ASKED QUESTIONS

What if I am unsure if this policy applies to me?

- For research environments, contact the Biological Safety Officer withing the VU Environmental Health and Safety Department.
- For areas outside of research, contact the Division of Occupational Health and Safety.
- Contact information listed in Additional Contacts Section.

ADDITIONAL CONTACTS

Subject	Contact/Position	Office	Phone
Policy Issuance	Tamara Cooley, CIH, CSP, Asst. Director	Division of Occupational Safety and Health	(615) 566-9158
Hepatitis B Vaccine	Sherry Spray, RN	VUMC Occupational Health Clinic	(615) 936-0955
Exposure Control Officer for research	Robin Trundy, Biological Safety Officer	VU Environmental Health and Safety Department	(615) 343-8918
Exposure Control Officer for non-research areas	Tamara Cooley, Assistant Director	Division of Occupational Safety and Health	(615) 566-9158

RELATED POLICIES/DOCUMENTS

Occupational Safety and Health Administration, [29CFR1910.1030 Bloodborne Pathogens](#)

VU Environmental Health and Safety, "Working with Human-Derived Materials & Bloodborne Pathogens in Basic Research Applications", <https://cdn.vanderbilt.edu/vu-URL/wp-content/uploads/sites/327/2022/09/19214327/VU-IBC-HDM-BBP-EC-Policy-9.27.2022.pdf>

HISTORY

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