Bloodborne Pathogens Exposure Control

Policy Statement

All “at-risk” employees and non-employee affiliates are required to adhere to guidelines established in the UVM Exposure Control Plan for Bloodborne Pathogens (ECP).

Reason for the Policy

The purpose of this policy is to maintain a safe place to work and study and to comply with applicable safety regulations. The University’s bloodborne pathogen Exposure Control Plan (http://esf.uvm.edu/uvmecp/index.html) exists to bring the University into compliance with the Occupational Safety and Health Administration’s Bloodborne Pathogens Standard (http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10051).

Applicability of the Policy

This policy applies to all University of Vermont faculty, staff, students, and visitors at risk of exposure to bloodborne pathogens (BBP) or other potentially infectious materials (OPIM).

Policy Elaboration

Bloodborne Pathogens Standard

The Occupational Safety & Health Administration’s (OSHA) Bloodborne Pathogens (BBP) standard applies to reasonably anticipated exposures to blood or other potentially infectious materials by University personnel as a result of that person’s duties. The University of Vermont complies with the standard by:

- Maintaining an exposure control plan,
- Implementing control measures,
- Communicating the hazards to employees
- Providing a vaccine for Hepatitis B, and
- Providing medical evaluation following a potential exposure.
All of these required elements are detailed in the Exposure Control Plan.

**Exposure Control Plan**
The University’s Exposure Control Plan (ECP) details the responsibilities of at-risk employees and personnel, their supervisors, and employees of the Risk Management & Safety Department. The ECP provides guidance for supervisors to use when determining whether a person is considered to be at risk for occupational exposure to BBP or OPIM. Supervisors document the “at-risk” status using the Risk Designation form available in the ECP.

**Control Measures**
The ECP requires the use of Universal Precautions, as defined in the BBP standard, as well as the use of engineering controls. Personal protective equipment selection, purchase, and use is described in the ECP as is waste disposal, laundering, and other specific methods to control the risks associated with BBP and OPIM.

**Communicating the Hazards**
BBP-related hazards are communicated through labeling and training. All containers of contaminated materials must be labeled in accordance with the University’s ECP. All at-risk employees are required to receive training on BBP-induced disease symptoms and transmission as well as measures used to control exposures. This training is required at the beginning of the employee’s work at the University and must be refreshed annually. The content and availability of the University’s general BBP training is detailed in the ECP. Training regarding the work practices specific to individual workplaces within the University is left to individual departments and supervisors.

**Hepatitis B Vaccine**
The Hepatitis B vaccine is offered to at-risk employees at no cost to themselves. Payment for these vaccines at the University is the responsibility of the Risk Management & Safety Department, which contracts with an occupational health provider, Concentra, to administer the vaccine. For more information on UVM’s occupational health program, refer to [http://www.uvm.edu/~riskmgmt/?Page=otj/occupationalhealth.html&SM=otj/otjinjuryreporting_submenu.html](http://www.uvm.edu/~riskmgmt/?Page=otj/occupationalhealth.html&SM=otj/otjinjuryreporting_submenu.html). Each at-risk employee must have a completed Hepatitis B Vaccine Consent/Dissent form, available in the ECP.

**Post Exposure Medical Evaluation**
Any employee or affiliate exposed to a BBP or OPIM is entitled to a medical review of the exposure and relative risk. The evaluation is at no cost to the employee. The elements of the evaluation and procedures for initiating the review are included in the ECP. Supervisors of employees involved in an exposure incident must complete an Employer’s First Report of Injury form. Supervisors of non-employees must complete a University Incident Report.

**Definitions**

*At-Risk Employee:* An employee is considered to be at risk for exposure to bloodborne pathogens if it is reasonably expected that they could come into contact with bloodborne pathogens or other potentially infectious materials in the course of the employee’s normal duties.
Bloodborne pathogens (BBP): Pathogenic microorganisms that are present in human blood and can cause disease in humans.

Contaminated: The presence or the reasonably anticipated presence of blood or other potentially infectious materials on any item or surface, including laundry.

Other potentially infectious materials (OPIM): Human semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, any body fluid visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids. In addition, any unfixed tissue or organ from a human (living or dead) and any pathogen-contaminated cell or tissue cultures, organ cultures, pathogen-contaminated culture medium or solutions, or tissues from pathogen-contaminated animals are OPIM.

Procedures

See Policy Elaboration

Forms

Consent/Refusal Form
http://www.uvm.edu/safety/sites/default/files/hepatitis_b_vaccine_consent.pdf
Incident Report Form to Report Employee Exposure
http://www.uvm.edu/safety/lab/incident-reporting
Incident Report Form to Report Non-Employee Exposure
http://www.uvm.edu/safety/lab/incident-reporting
Risk Designation Form
If you need assistance after you have been exposed to potentially infectious material, go to the Exposure Control Plan.
http://esf.uvm.edu/uvmecp

Contacts

Questions related to the daily operational interpretation of this policy should be directed to:

Department of Risk Management & Safety
(802) 656-5400 or (802) 656-3242
safety@uvm.edu

The Vice President for University Relations and Administration is the official responsible for the interpretation and administration of this policy.
Related Documents/Policies

Laboratory Health and Safety Policy  
www.uvm.edu/policies/riskmgm/labsafety.pdf
Occupational Safety and Health Administration’s Bloodborne Pathogens Standard  
University of Vermont Exposure Control Plan for Bloodborne Pathogens  
http://esf.uvm.edu/uvmecp

Effective Date

Approved by the President March 7, 2017