



POLICY

Title: 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](#) exists to bring the University into compliance with the [Occupational Safety and Health Administration’s Bloodborne Pathogens Standard](#).

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).

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; this may include emergency responders but does not include “good Samaritans.”

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, pericardial 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

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 two occupational health providers, Concentra and Champlain Medical, to administer the vaccine:

- Champlain Medical Urgent Care, 150 Kennedy Drive, South Burlington, VT; (802) 448-9370
- Concentra Urgent Care, 7 Fayette Drive #1, South Burlington, VT; (802) 658-5756

For more information, refer to the UVM Occupational Health Program at www.uvm.edu/riskmanagement/campus-and-workplace-safety.

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.

Contacts

Questions concerning the daily operational interpretation of this policy should be directed to the following (in accordance with the policy elaboration and procedures):	
Title(s)/Department(s):	Contact Information:
Department of Risk Management & Safety	(802) 656-3242 safety@uvm.edu

Forms/Flowcharts/Diagrams

- [CDC Vaccination Information](#)
- [Consent/Refusal Form](#)
- [Incident/injury Report Form to Report Employee Exposure](#)
- [Incident/injury Report Form to Report Non-Employee Exposure](#)
- [Risk Designation Form for Supervisors to Complete](#)
- If you need assistance after you have been exposed to potentially infectious material, go to the [Exposure Control Plan](#).

Related Documents/Policies

- [Laboratory Health and Safety Policy](#)
- [University of Vermont Exposure Control Plan for Bloodborne Pathogens](#)

Regulatory References/Citations

- [Occupational Safety and Health Administration's Bloodborne Pathogens Standard](#)

Training/Education

Training/education related to this policy is as follows:

Training Topic:	Safety Around Bloodborne Pathogens training "BBP: CITI, OSHA Bloodborne Pathogens"		
Training Audience:	UVM employees at risk for contact with human blood, tissues, human cell lines, or other potentially infectious material.	Delivered By:	Risk Management & Safety
Method of Delivery:	Online: www.uvm.edu/ibc/education/tutorial_completion.html	Frequency:	Within 30 days of hire and annually thereafter.

About This Policy

Responsible Official:	Chief Safety and Compliance Officer	Approval Authority:	President
Policy Number:	V. 5.2.4	Effective Date:	March 7, 2017
Revision History:	<ul style="list-style-type: none">• V. 4.1.21.1 originally approved January 25, 2007• V. 4.1.21.2 approved March 18, 2010• V. 4.1.21.3/ V. 5.2.3 approved November 12, 2012• September 11, 2019• Reaffirmed May 2, 2022		

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