



**COMPANY  
HEALTH & SAFETY  
PROGRAM**

Issue: A  
Date: 4/20/2009  
Rev:  
Date:  
Authorized: *G.M.N.*

**Title: Bloodborne Pathogens Exposure  
Control Plan**

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## **1.0 PURPOSE**

The purpose of this plan is to minimize the potential of PPP employees coming into contact with blood or other potentially infectious materials.

## **2.0 SCOPE**

The PPP Bloodborne Pathogens Exposure Control Plan requires project specific input and implementation when employees are at risk of exposure to bloodborne pathogens. The responsible project manager shall inform the PPP safety director of impending jobs that may be affected. Together, they shall perform and document an *exposure determination*.

This plan includes general procedures to control exposure to bloodborne pathogens in accordance with “29 CFR 1910.1030 Bloodborne Pathogens” and “MIOSHA Occupational Health Standards Part 554. Bloodborne Infectious Diseases”.

## **3.0 INDEX TO PLAN**

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- 2.0 Scope
- 3.0 Index to Plan
- 4.0 Exposure Determination
- 5.0 Compliance Procedures
- 6.0 Contaminated Equipment
- 7.0 Personal Protective Equipment
- 8.0 Hepatitis B Vaccination
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#### **4.0 EXPOSURE DETERMINATION**

Government regulations require employers to perform an exposure determination identifying which employees may incur occupational exposure to blood or other potentially infectious materials. The exposure determination is made without regard to the use of personal protective equipment (i.e. employees are considered to be exposed even if they wear personal protective equipment). The exposure determination is required to list all job classifications in which employees may be expected to incur such occupational exposure, regardless of frequency.

PPP occupations/job classifications that would typically fall into this category are:

1. First aid and CPR responders (a voluntary collateral duty);
2. Tradesmen working in medical facilities; and
3. Plumbers working on sanitary plumbing systems that have been in use.

PPP Form S.BPED.1 – Bloodborne Pathogen Exposure Determination is included in Item 13.0 of this section. This form shall be used for job-site specific exposure determinations.

#### **5.0 COMPLIANCE PROCEDURES**

Compliance procedures include:

1. PPP Job Safety Analysis Forms shall be used to be in compliance with MIOSHA's requirement for the exposure control plan to include written standard operating procedures (SOP's) that address all of the following areas:
  - Employee recognition of reasonably anticipated exposure to blood and other potentially infectious materials;
  - Appropriate selection, use, maintenance and disposal of personal protective equipment;
  - Contingency plans for foreseeable circumstances that prevent following the recommended procedures; and



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- Contingency plan to address the management of inadvertent exposures, such as needle-sticks or mucus membrane exposures.
2. Universal precautions shall be observed to prevent contact with blood and other potentially infectious materials. All blood or other potentially infectious materials will be considered infectious regardless of the perceived status of the source.
  3. Engineering controls shall be examined and maintained on a regular schedule.
  4. Hand washing facilities shall be available to the employees who may incur exposure to blood or other potentially infectious materials. Facility locations shall be communicated to affected employees during review of this plan as part of training.
  5. Employees shall wash their hands immediately after removing gloves or other protective clothing, as soon as possible after any exposure incident with blood or other potentially infectious materials, even if personal protective equipment was worn, and upon leaving the work area.
  6. Antiseptic cleanser or towelettes will be available in designated areas. If these alternatives are used, hands must be washed with soap and water as soon as feasible.
  7. If employees incur exposure to their skin or mucous membranes, those areas shall be washed or flushed with water as appropriate as soon as possible following contact.
  8. Leak proof bags will be provided for placement of used bandages or other potentially infectious materials.
  9. Work practice controls, including use of proper PPE, shall be used to minimize or eliminate employee exposure. The SOP's/JSA's shall communicate the proper work practice controls and procedures.
  10. Personal protective equipment should not be used in place of engineering and other work practice controls when and where controls are feasible.



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11. The project supervisor shall assure that all employees whose work may involve potential exposure to infectious materials are made aware of this exposure control plan, and copies made available.

## **6.0 CONTAMINATED EQUIPMENT**

Equipment which has become contaminated with blood or other potentially infectious materials shall be examined prior to servicing or shipping and shall be cleaned as necessary.

## **7.0 PERSONAL PROTECTIVE EQUIPMENT**

Personal protective equipment (PPE) procedures include:

1. All PPE shall be provided, disposed of, repaired or replaced at no cost to employees.
2. It will be the responsibility of the PPP project supervisor to provide appropriate PPE for all activities where exposure to blood or other potentially infectious materials may occur.
3. Gloves shall be worn where it is reasonably anticipated that employees will have hand contact with blood, other potentially infectious materials, non-intact skin and mucous membrane.
4. Gloves will be provided to all first aid/CPR responders and/or tradesmen who may have contact with potentially infectious material, as well as available in all first aid kits in all facilities.
5. Disposable gloves are not to be washed or decontaminated for reuse and are to be replaced as soon as practical when they become contaminated and as soon as feasible if they are torn, punctured or when their ability to function as a barrier is compromised.
6. In combination with eye protection devices, such as goggles or glasses with solid side shields, face masks are required to be worn whenever splashes, spray, splatter or droplets of blood or other potentially infectious materials may be generated and eye, nose or mouth contamination can reasonably be anticipated.



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7. Appropriate protective clothing, such as disposable gowns, aprons or similar outer garments are to be used when potentially infectious materials may splash, spray, splatter or cause droplets in the air.
8. All garments which are penetrated by blood shall be removed immediately or as soon as feasible. All PPE shall be removed prior to leaving the work area. All contaminated equipment and materials used are to be placed in biohazard bags and closed prior to making an incident report.
9. All contaminated work surfaces will be decontaminated after completion of procedures, immediately or as soon as feasible after any spill of blood or other potentially infectious materials and at the end of the work shift if the surface may have become contaminated since the last cleaning.
10. Decontamination shall be accomplished by utilizing a 1:10 bleach water solution to clean all contaminated work areas and tools.

## **8.0 HEPATITIS B VACCINATION**

PPP shall assure that all employees will receive appropriate counseling with regard to medical risks and benefits before undergoing any evaluations, procedures, vaccinations or post exposure prophylaxes.

Within 10 working days of the time of initial assignment and after the employee has received the required training, PPP shall provide each *Category A* employee, at no cost to the employee, Hepatitis B Virus (HBV) antibody testing for employees who desire such testing before deciding whether or not to receive HBV vaccination, and/or HBV vaccination series. The HBV vaccination series does not have to be provided:

1. If an employee has previously received the complete HBV vaccination series;
2. If an employee is found to be immune to HBV by virtue of adequate antibody titer; or
3. The vaccine is contraindicated for medical reasons.



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Employees who decline to be vaccinated must sign a PPP Form S.HBVD.1 – Hepatitis B Vaccination Declination. An employee that declines may receive the vaccination in the future if he/she chooses, at no cost to the employee.

## **9.0 POST EXPOSURE EVALUATION AND FOLLOW-UP**

The PPP safety director shall be responsible for assuring that Post Exposure Evaluations and Follow-up are effectively performed and the appropriate records are maintained.

Post Exposure Evaluation and Follow-up procedures include:

1. When an exposure incident occurs it should be immediately reported to the PPP project supervisor who will complete an Exposure Incident Investigation Form and notify the safety director.
2. Following a report of an exposure incident, the PPP safety director shall make immediately available to the exposed employee, through PPP's medical provider, a confidential medical evaluation and follow-up that shall include:
  - a. Counseling on risk reduction and the risks and benefits of Human Immunodeficiency Virus (HIV) testing in accordance with state law;
  - b. Documentation of the route of exposure and the circumstances under which the exposure incident occurred; and
  - c. Identification of the source individual, unless prohibited by law.
3. The source individual's blood shall be tested for hepatitis B virus (HBV) and human immunodeficiency virus (HIV) infection. Results shall be made available to the exposed employee. The employee will be made aware of any applicable laws and regulations concerning disclosure of the identity and infectious status of a source individual.
4. The exposed employee's blood should be tested for HBV and HIV status.



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5. The exposed employee shall be given appropriate counseling concerning precautions to take, what potential illnesses to be alert for, and to report any related experiences to designated personnel.

## **10.0 THE ROLE OF THE HEALTHCARE PROFESSIONAL**

The role of the healthcare professional includes:

1. Performing a confidential post exposure evaluation.
2. Providing the PPP safety director with a written opinion evaluating the exposed employee's situation, a copy of which is provided to the exposed employee.
3. In keeping with the emphasis on confidentiality, the written opinion will contain only the following information;
  - a. Whether hepatitis B vaccination is indicated for the employee.
  - b. Whether the employee has received the hepatitis B vaccination.
  - c. Confirmation that the employee has been informed of the results of the evaluation.
  - d. Confirmation that the employee has been told about any medical conditions resulting from the exposure incident that require further evaluation or treatment.
4. All other findings or diagnosis will remain confidential and will not be included in the written report.
5. Treatment after blood tests are obtained depends on the HIV/HBV status of the exposure source. The medical provider will determine the best protocol for management of HIV and HBV.

## **11.0 TRAINING**



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It shall be the responsibility of the PPP project supervisor to assure that PPP employees with job classifications listed in *category A* of the *exposure determination* have been appropriately trained prior to being assigned work in those job classifications. Training procedures shall include:

1. The PPP safety director shall coordinate employee training to assure appropriate instructor qualifications, subject matter and documentation of training.
2. Training for all employees whose work assignments may put them at risk of coming into contact with potentially infectious materials, or who volunteer for first aid/CPR responsibilities, will be conducted prior to initial assignment to tasks where occupational exposure may occur and annually thereafter.
3. Training sessions shall afford employees ample opportunity for discussion and the answering of questions by a knowledgeable trainer. The person or persons who conduct training shall be knowledgeable in all of the following areas:
  - The information presented in the training session;
  - PPP's exposure control plan; and
  - Conditions of the work environment that affect the implementation of the exposure control plan.
4. Training shall focus on proper work practice controls and the use of appropriate PPE, and its limitations, to prevent exposure to bloodborne pathogens.
5. Training shall include:
  - a. Review of this exposure control plan.
  - b. A presentation of MCAA Training Video, "Precautions Pay: Protect Yourself Against Bloodborne Pathogens".
  - c. Review of "29 CFR Part 1910.1030" or "MIOSHA OH Part 554.
  - d. Review of task-specific standard operating procedures (SOP's) in the form of JSA's, as described in Item 1. under subtitle 5.0 of this section.





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- e. Opportunities for supervised practice with PPE and other equipment which is designed to reduce the likelihood for exposure and which will be used in the employee's work.
6. To assure that the training has produced meaningful results all employees will be required to pass a written test which will be administered at the time of training, before training is considered completed.

## **12.0 RECORDKEEPING**

Recordkeeping procedures shall include:

1. Recordkeeping, with respect to this exposure control plan, shall be coordinated by the PPP safety director, and records maintained under the supervision of the PPP controller.
2. Employee medical records with respect to this exposure control plan shall be maintained for the duration of employment of the individual plus 30 years.
3. Medical records are not to be disclosed or reported to any person within or outside the workplace without the employee's written consent, except as required by law.
4. Training records with respect to this exposure control plan shall be maintained for a minimum of 3 years from the date of training.
5. Training records shall be made available to all employees and their representatives, as well as regulatory compliance officers, for examination and copying.

## **13.0 RELATED FORMS**

Please find attached related forms:

- [S.BPED.1 – PPP Bloodborne Pathogen Exposure Determination](#)
- [S.HBVD.1 – PPP Hepatitis B Vaccination Declination](#)
- [S.EIIR.1 – PPP Exposure Incident Investigation](#)



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