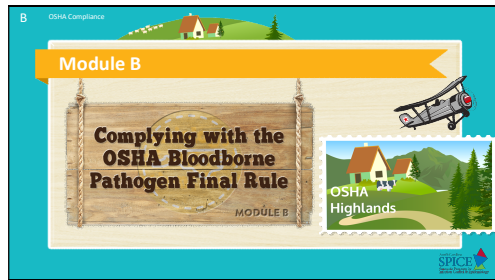




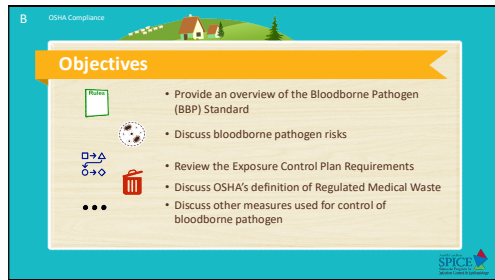
Infection Prevention Training for Outpatient Healthcare Settings

Module B- Complying with the OSHA Bloodborne Pathogen Final Rule HANDOUT

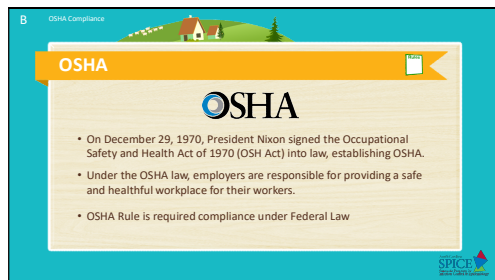
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B OSHA Compliance

OSHA and OSHA-NC

1970 
• Occupational Safety and Health Act (OSHA) General Duty Clause
"requires that employers provide every employee with a safe and healthful workplace"

1973 
• Occupational Safety and Health Act of North Carolina (OSHANC)




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B OSHA Compliance

OSHA's Federal Regulations: Bloodborne Pathogens

• December 6th, 1991 – Standard 1910.1030, Final Rule on Occupational Exposure to Bloodborne Pathogens
• January 18th, 2001 - Occupational Exposure to Bloodborne Pathogens; Needlestick and Other Sharps Injuries, Final Rule.
• Additions to the exposure control plan
• Sharps injury log required




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B OSHA Compliance

OSHA's Definition - "Occupational Exposure"

Includes

- Healthcare employees whose duties involve "reasonably anticipated contact" with blood or other potentially infectious material
 - Contaminated sharps
 - Non-intact skin
 - Medical waste
 - Plumbing
 - Human bites that break the skin




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B OSHA Compliance

OSHA's Definition - "Occupational Exposure"

Does not include

- Healthcare employees whose duties do not involve "reasonably anticipated contact"
- Good Samaritan acts, encourages voluntarily providing follow-up
- Receptionist/Business Managers



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B OSHA Compliance


BBP Standard Scope & Application


Applies to:


- All private sector employees
- All public sector employees
- Students receiving compensation (teaching/graduate assistants, internships)

Does not include:

- Self-employed persons (sole practitioners/partners)
- Students not receiving compensation
- Workplace hazards regulated by another federal agency (Department of Energy for example)

Employee 

Self-employed 




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B OSHA Compliance

Contract Provided Services

Employer Paying for Contract Services (Host)	Employer Providing for Contract Services (Contractor)
<ul style="list-style-type: none">• Site or department specific bloodborne pathogen training• Providing department specific personal protective equipment (PPE) and training on use• Primary responsibility for control of potential exposure conditions	<ul style="list-style-type: none">• General bloodborne pathogen training at time of hire and annually thereafter• Offer HBV vaccination• Follow up on occupational exposure



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B OSHA Compliance

Knowledge Check

True or False?
OSHA's rules apply to:

- All private sector employees
- Students receiving compensation
- Self employed persons

True False


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B OSHA Compliance

Types Of Occupational Exposures To Bloodborne Pathogens

- Percutaneous injury (PI)
- Mucous membrane
- Non-intact skin



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B OSHA Compliance


Body Fluids Linked to Transmission of HBV, HCV and/or HIV

Other Potentially Infectious Material (OPIM) includes:

- semen
- vaginal secretions
- cerebrospinal fluid
- synovial fluid
- pleural fluid
- 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

- pericardial fluid
- peritoneal fluid
- amniotic fluid
- saliva in dental procedures

Blood



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B OSHA Compliance

Bloodborne Pathogens 1910.1030(b)

Pathogenic organisms that are present in human blood
and
Can cause disease in humans

Includes but is not limited to:

- Hepatitis B virus (HBV)
- Hepatitis C virus (HCV)
- Human immunodeficiency virus (HIV)

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B OSHA Compliance

Knowledge Check

True or False:
Bloodborne pathogens include any pathogenic organism that is found in the human blood and is capable of causing disease in humans.

True False

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B OSHA Compliance

Written Exposure Control Plan (ECP)

Bloodborne Pathogen Exposure Plan MUST:

- Be reviewed/updated annually
- Be updated when procedures or equipment change
- Be made accessible to all staff
- Contain all components of BBP rule



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B OSHA Compliance

Exposure Control Plan

Contains:

- Exposure determination
- Methods of Compliance
- Hepatitis B Vaccination and Post-Exposure Evaluation and Follow-up
- Communication of Hazards to Employees
- Recordkeeping requirements
- Procedure for evaluating circumstances surrounding exposure incidents.



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B OSHA Compliance

Exposure Determination



Physicians and surgeons
Housekeeping workers
Dentists and dental workers
Nurses
Clinical/diagnostic laboratory workers
Medical technologists

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B OSHA Compliance

Methods of Compliance (MOC)

ID → OSHA → Requires implementation of specific measures
OSHA → Specifies order of measures

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B OSHA Compliance

Methods of Compliance (MOC)

Required Controls

Engineering
Work Practice
PPE
Administrative

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B OSHA Compliance

Engineering Controls

- Remove the hazard from the employee
- Should be used in preference to other controls
- Employer must:
 - Review annually
 - Train employee on use
 - Document in ECP

Required by OSHA

Safety needles
Safety sharps
Sharps containers
Needless devices

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B OSHA Compliance

Needlestick Safety and Prevention Act (2001)

2001 → Act → Revised BBP standard

Directs OSHA to revise BBP standard to clarify requirement for employers to evaluate safer needles and involve employees in identifying and choosing devices. Requires documentation of frontline provider (non-managerial) participation in the evaluation of safety devices and decision making in product purchasing.

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B OSHA Compliance

OSHA Enforcement Revision – Action List

- Collect data on device-related injuries including:
 - How exposure occurred
 - Type and brand of device
 - Circumstances of injury
 - Job category
- Use information on injuries to guide the selection and implementation of safety devices

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B OSHA Compliance

(MOC): Work Practice Controls

Alterations in the manner in which a task is performed to reduce likelihood of exposure


- Perform hand hygiene as soon as possible after glove removal or contact with body fluids
- All PPE removed as soon as possible after leaving work area and placed in designated container for storage, decontamination, or disposal
- Used needles and sharps shall not be sheared, bent, broken, recapped or resheathed by hand.

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B OSHA Compliance

(MOC): Work Practice Controls



Eating, drinking, smoking, applying cosmetics or lip balm and handling contact lenses are prohibited in work areas where there is a reasonable likelihood of occupational exposure.

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B OSHA Compliance

(MOC): Personal Protective Equipment (PPE)



Employers must provide and assure use


- Gloves, masks, protective eyewear
- Puncture-resistant gloves and thimbles
- Ventilation Devices

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B OSHA Compliance

Personal Protective Equipment: *The Rules*



- Mechanism must be in place for cleaning, laundering or disposing of employees' protective clothing.
- Must be provided by the employer at no cost, in appropriate sizes and housed in accessible locations for the employee.
- Mechanism must be in place for replacement or washing of an employee-owned uniform or clothing if it becomes contaminated.
(OSHA required)

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B OSHA Compliance

(MOC): HBV Vaccination

- HBV vaccination has to be:
 - Offered at no cost
 - Offered after training
 - Within 10 days assignment
- Vaccinations given according to recommendations for standard medical practice.

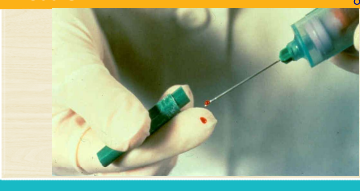
A declination form must be signed by employee who refuses the HBV vaccination (including those who do not complete the recommended series).



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B OSHA Compliance

Module B




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B OSHA Compliance

Post - Exposure Evaluation and Follow Up

Following a report of an exposure incident, the employer shall make:

- Immediately available to the employee a confidential medical evaluation and follow-up including the following:
 - Document the route of exposure
 - Document the HIV, HBV and HCV status of source person, if known
 - Notify the source person an exposure has occurred
- Test the source person for HIV, HBV and HCV (unless status known)
- Offer baseline testing to employee
- Offer counselling and post exposure prophylaxis, if indicated




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B OSHA Compliance

Post Exposure and Follow Up

The employer must also obtain and provide the exposed employee with a copy of the evaluating healthcare professional's written opinion within 15 days of the completion of the evaluation.



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B OSHA Compliance

Record Keeping Requirements Medical Records

Record keeping requirements
Must maintain and keep confidential an accurate record for each employee with occupational exposure

- Name and SS #
- HBV status
- Copy of results of post-exposure follow up
- Copy of the healthcare professional's written opinion

Must maintain for at least the duration of employment plus 30 years






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B OSHA Compliance

Revisions to Osha's Recordkeeping Rule, 2002, Requires a Record of All Sharps Injuries



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B OSHA Compliance

Knowledge Check

The written exposure control plan must include:

- A. A list of jobs in which employees have anticipated occupational exposure to blood
- B. A description of the existing engineering controls
- C. Procedures for follow-up if an exposure occurs
- D. A description of work practice controls
- E. All of the above

Select the correct response

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B OSHA Compliance

Definition of Regulated Medical Waste: OSHA

OSHA regulates identification and labeling of medical waste



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B OSHA Compliance

Definition of Regulated Medical Waste: OSHA

Regulated Waste means:

- Liquid or semi-liquid blood or other potentially infectious materials
- Contaminated items that would release blood or other potentially infectious materials in a liquid or semi-liquid state if compressed
- Items that are caked with dried blood or other potentially infectious materials and are capable of releasing these materials during handling
- Contaminated sharps
- Pathological and microbiological wastes containing blood or other potentially infectious materials

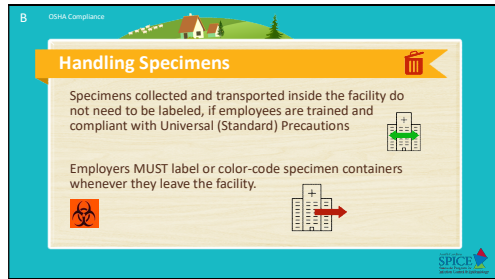


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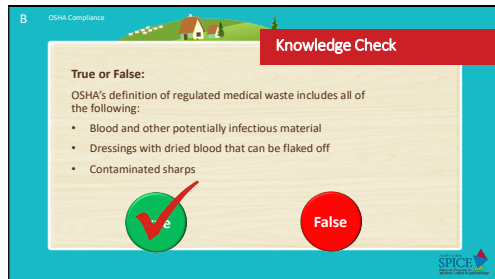
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B OSHA Compliance

Housekeeping Practices

- Employer shall assure that the worksite is maintained in a clean and sanitary condition.
- Employer shall determine and implement an appropriate cleaning schedule for rooms at risk for BBP contamination, depending on the site, type of surfaces, and amount of soil present.
- Employer shall ensure that staff wear appropriate PPE including general purpose utility gloves during all cleaning of BBP and decontamination procedures.





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B OSHA Compliance

Laundry Practices

- Use of appropriate PPE during handling and sorting of contaminated linen
- Contaminated laundry bagged at point of use
- Use standard precautions when handling all contaminated laundry





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B OSHA Compliance

Education and Training

Employers must train at-risk employees:

- At no cost and on paid time
- At time of initial assignment and
- At least annually thereafter
- If new occupational exposure is recognized from the literature
- Or new procedure or use of a new type of equipment is introduced



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B OSHA Compliance

Employee Training

Training requirements:

- Be conducted by someone knowledgeable in the subject matter covered and how it relates to the workplace
- Provide an opportunity for interactive questions and answers with the individual conducting the session.

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B OSHA Compliance

13 topics

- Explanation of epidemiology and symptoms of BBP
- Accessible copy of regulatory text
- Information on types, proper use, donning, removal, handling and disposal of PPE
- Explanation of modes of transmission
- Information on how to recognize risk that may involve exposure
- Explanation of procedure for post exposure follow up
- Information on post exposure evaluation
- Explanation of appropriate use of engineering controls, work practice and PPE
- Information on Hepatitis B vaccine
- Explanation of the basis for PPE selection
- Explanation of the signs and labels and/or color coding required
- Information on how to control and prevent exposure to the respiratory agent

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B OSHA Compliance

Recordkeeping

The employer must keep training records with the following information:

- The dates of the training session
- The contents or a summary of the training session
- The names and qualifications of the persons conducting the training
- The names and job titles of all persons attending the training sessions

Employers must keep these records for 3 years from the date of the training session

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B OSHA Compliance



OSHA: North Carolina

Deputy Commissioner - (919) 707-7800

Consultative Services - (919) 707-7846

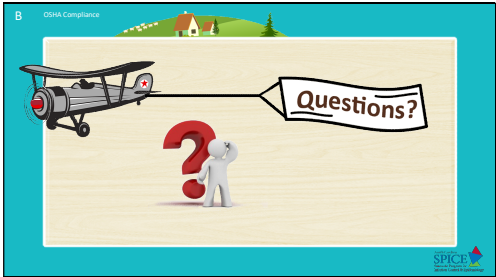
ASK OSH - (919) 707-7876

NC Department of Labor – 800-NCLABOR

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B OSHA Compliance



Questions?

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