

OSHA Bloodborne Pathogen Exposure Plan

Occupational Safety and Health Administration (OSHA) requires employers to follow the bloodborne pathogen standard.

The Bloodborne Pathogen Standard requires employers to:

- Establish an exposure control plan
- Implement the use of universal precautions
- Identify and use engineering and work practice controls
- Provide personal protective equipment
- Communicate hazards
- Make hepatitis B vaccinations available, free of charge
- Maintain a sharps injury log
- Provide post-exposure care, including prophylaxis, at no cost to the employee
- Provide training (MDH provides) and maintain records of completed training

Source: [OSHA: Bloodborne Pathogens and Needlestick Prevention \(https://www.osha.gov/bloodborne-pathogens/hazards\)](https://www.osha.gov/bloodborne-pathogens/hazards)

Every employer whose workers face potential contact with human blood or other potentially infectious materials (OPIM) must maintain a written Exposure Control Plan under OSHA's Bloodborne Pathogens Standard, found at 29 CFR 1910.1030. That plan spells out how the employer will protect staff from diseases like Hepatitis B, Hepatitis C, and HIV.

Sample elements in a Bloodborne Pathogen Exposure Control Plan

- **Exposure determination**
 - Identify job classifications, tasks, and procedures where employees may have occupational exposure to blood or other potentially infectious materials (OPIM).
 - Document the basis for determining exposure risk.
- **Methods of compliance**
 - Engineering controls: Safety-engineered devices, sharps containers, ventilation, barriers, etc.
 - Work practice controls: Standard precautions, safe handling, decontamination, and safe injection practices
 - Personal protective equipment (PPE): Gloves, gowns, masks, face shields, and other required PPE
 - Housekeeping: Proper disposal of sharps, cleaning of work areas, and waste management

- **Hepatitis B vaccination**
 - Offer the hepatitis B vaccine series free of charge to all employees at risk of exposure
- **Post-exposure evaluation and follow-up**
 - Procedures for confidential medical evaluation, testing, and follow-up after an exposure incident
- **Hazard communication**
 - Use labels, signs, and training to communicate biohazard risks to employees
- **Employee training**
 - Provide initial and periodic training on the ECP, hazard communication, and safe work practices
- **Recordkeeping**
 - Maintain logs for hepatitis B vaccinations, sharps injury incidents, and post-exposure follow-up
- **Review and update**
 - Review the ECP at least annually and whenever there are changes in tasks, procedures, or positions that affect exposure risk
- **Involvement of at-risk employees**
 - Solicit input from non-managerial employees responsible for direct client care in identifying, evaluating, and selecting effective controls

Resources

- [Model Exposure Control Plan](https://mn.gov/admin/assets/bloodb_pathogens_model_exposure_control_plan_tcm36-205861.doc)
(https://mn.gov/admin/assets/bloodb_pathogens_model_exposure_control_plan_tcm36-205861.doc)
- [Bloodborne Pathogen Exposure Control Plan: What OSHA 1910.1030 Requires and How to Write One](https://safetyregulatory.com/guides/bloodborne-pathogen-exposure-plan/)
(<https://safetyregulatory.com/guides/bloodborne-pathogen-exposure-plan/>)

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