

Bloodborne Pathogen Program

You may follow this template/outline, however it is provided as an example only.

You must tailor the template to your actual business operations and the potential hazards that may be encountered by your employees.

If you are using the electronic version, please read through the document and add and/or delete information as needed to make it job site specific. You also have the option of pressing the “F11” key to scroll through the document and enter information into certain fields that need to be customized to your specific business and/or location.

This program must be implemented in order to be effective in practice. It also needs to be updated as changes occur in your business (new equipment, new processes, etc.).

Exposure Determination

Although there is not a large risk of exposure in the roofing industry, [company name] has tried to identify exposure situations that employees may encounter.

The following page lists all employees with any reasonable potential for exposure, their titles and the reasons they may find themselves in an exposure situation. For example, all supervisors who are trained in first aid and may have an occupational exposure in the event of an accident are listed.

The initial list was compiled on or before _____.
(Date)

_____ will work with department managers and supervisors to
revise and
(Employee Name)
update these lists as our tasks, procedures and classifications change.

Work Activities Involving Potential Exposure to Bloodborne Pathogens

Listed below are the names, titles and job responsibilities that may bring these individuals into contact with human blood or other potentially infectious materials, which may result in exposure to bloodborne pathogens:

Name	Title	Job Responsibilities
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Bloodborne Pathogens Compliance Program

[Company name] understands that there are a number of areas that must be addressed to effectively eliminate or minimize exposure to bloodborne pathogens in any business, and although not all need to be fully addressed, each will be discussed to ensure that all areas are considered. The first four areas addressed in our plan are:

- use of “universal precautions”
- establishment of appropriate engineering controls and work practice controls
- use of necessary personal protective equipment (PPE)
- implementation of appropriate housekeeping

Each of these areas is reviewed with employees during their bloodborne pathogens training. By rigorously following the requirements of the Occupational Safety and Health Administration (OSHA’s) Bloodborne Pathogens Standard in these four areas, [company name] not only comply with OSHA’s standard but also eliminate or minimize its employees’ occupational exposure to bloodborne pathogens as much as possible.

A. Universal Precautions

In the business, which includes all off-site work locations, as well as the shop, [company name] has begun the practice of “universal precautions.” As a result, all human blood and bodily fluids are treated as though they are known to be infected with Hepatitis B Virus (HBV), Human Immunodeficiency Virus (HIV) and other bloodborne pathogens.

In circumstances where it is difficult or impossible to differentiate between body fluid types, it is assumed that all body fluids are potentially infectious. _____ is responsible for overseeing the Universal Precautions Program. (Employee Name)

B. Engineering and Work Practice Controls

Engineering controls are controls that isolate or remove bloodborne pathogens hazards from the workplace. Work practice controls reduce the likelihood of exposure by altering the manner in which a task is performed.

In the construction industry, blood or other bodily fluids are not worked with in an occupational manner; any exposure to these potentially hazardous substances by anyone other than the cleaning staff is almost always the result of an accident. There is continual work to create safer working conditions for employees so that accidents will not occur, and all aspects of the safety program constitute work practice controls. Additional controls take the form of personal protective equipment (PPE), hand washing and other controls that occur immediately during and after an accident on a job site.

Listed below are potential exposure situations and the engineering or work precautions taken to minimize risks.

_____ is responsible for the Engineering and Work Practice Controls program. (Employee Name)

POTENTIAL EXPOSURES

PRECAUTION

_____	_____
_____	_____
_____	_____
_____	_____

This list is re-examined during an annual exposure control plan review, and opportunities for new or improved controls are identified. Any existing equipment is checked for proper function and needed repair or replacement every _____ months by the supervisor of the crew or job site.

C. Personal Protective Equipment

Personal protective equipment is employees' line of defense against bloodborne pathogens. Because of this, [company name] provides (at no cost to the employees) the PPE they need to protect themselves against exposures.

PPE at the office and work sites include:

_____ is responsible for ensuring that all work sites have appropriate

(Employee Name)

PPE available for employees.

Employees are trained regarding the need for appropriate PPE for their job responsibilities. Additional training is provided when necessary, for example, if an employee takes a new position or if new job functions are added to his current position.

To ensure that PPE is not contaminated and is in the appropriate condition to protect employees from potential exposure, our [company name] adheres to the following practices:

- All PPE is inspected periodically and repaired or replaced, as needed, to maintain effectiveness.
- Single-use PPE is disposed of immediately after use.

To make sure that this equipment is used as effectively as possible, employees adhere to the following practices when using their PPE:

- Any garments penetrated by blood or other body fluids are removed as soon as feasible.
- All potentially affected PPE is removed prior to leaving the work area.
- Gloves are worn whenever an employee anticipates handling or touching contaminated items or surfaces.

- Disposable gloves are replaced as soon as practical after contamination or when they are torn, punctured or otherwise lose their ability to function as an exposure barrier.

D. Housekeeping

Maintaining its shop, office and work sites in clean and sanitary condition is an important part of [company name's] exposure control plan. Employees are trained to promptly dispose of or clean any surface that comes into contact with bodily fluids, in keeping with the other sections of this program. There is no reason to anticipate regular exposure to bodily fluids by employees, other than the janitorial staff, so there is no routine schedule for decontamination at work sites.

The janitorial staff employs the following practices:

- All equipment and surfaces are cleaned and decontaminated after contact with blood or other potentially infectious material.
- Protective coverings (such as plastic trash bags) are removed and replaced at the end of the work shift if they have been contaminated during the shift.
- All trash containers, pails and bins are routinely cleaned and decontaminated as soon as possible after contaminated.

_____ is responsible for overseeing the cleaning and decontamination
(Employee Name)
process and making sure that it is carried out regularly.

[Company name] is very careful in its facility and on its work sites when handling regulated waste (including used bandages, tissues, feminine hygiene products and any other potentially infectious materials).

- They are discarded or bagged in containers that are:
 - closeable
 - puncture-resistant
 - leak-proof (if the materials have the potential to leak)
 - -red in color or labeled with the appropriate biohazard warning label
- Containers used for these purposes are placed in appropriate locations within easy access of employees and as close as possible to the sources of the waste.
- Waste containers are maintained upright and not allowed to overfill.
- Whenever employees move containers of regulated waste from one area to another, the containers are immediately closed and placed inside a secondary container, if leakage is possible from the first container.

_____ is responsible for the collection and handling of the facility's contaminated waste.
(Employee Name)

Hepatitis B Vaccination Employee List

For the purposes of compliance with the Occupational Safety and Health Administration's General Duty Clause, [company name] has prepared a written exposure control plan and implemented a training program on bloodborne pathogens. The majority of employees are not exposed to bloodborne pathogens, and any exposure would be the result of an on-the-job accident only. For this reason, Hepatitis B vaccinations are not offered, except to those employees required by the company to be certified in first aid and any members of the janitorial staff employed by this business. If a janitorial company contracts with [company name], vaccination will not be offered to those employees.

Employees who have been offered the Hepatitis B vaccination include the following:

Declination

In the event that any employees who are offered the Hepatitis B vaccination series decide to decline the series, they must read and sign the mandatory Hepatitis B Vaccine Declination form on the next page.

Hepatitis B Vaccine Declination Form

I understand that because of my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring the Hepatitis B Virus (HBV). I have been given the opportunity to be vaccinated with the Hepatitis B vaccine at no charge to me. At this time, however, I decline the Hepatitis B vaccination. I understand that by declining this vaccine, I continue to be at risk for acquiring Hepatitis B, a serious disease. If in the future I want to be vaccinated with the Hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Employee: _____

Date: _____

Supervisor: _____

Post-Exposure Evaluation and Follow-Up

If employees are involved in an incident where exposure to bloodborne pathogens may have occurred, there are two efforts on which to immediately focus:

1. investigating the circumstances surrounding the exposure incident
2. making sure that employees receive medical consultation and treatment (if required) as expediently as possible

_____ investigates every exposure incident that occurs in the
(Employee Name)
company facilities or on work sites. This investigation is initiated within 24 hours of the incident and involves gathering the following information:

- date and time when the incident occurred
- where the incident occurred
- what potentially infectious materials were involved in the incident
- source of the material
- under what circumstances the incident occurred
- how the incident was caused
- personal protective equipment in use at the time of exposure
- actions taken as a result of the exposure (decontamination, clean-up, notifications)

After this information is gathered, it is evaluated and a written summary of the incident and its cause is prepared. Recommendations are then made for avoiding similar incidents in the future (see the Incident Investigation Form at the end of this section).

To make sure employees receive the best and most timely treatment when an exposure to bloodborne pathogens occurs, an evaluation and follow-up process has been set up. The checklist at the end of this section will be used to verify that all the steps in the process have been taken correctly. This process is overseen by

(Employee Name)

Much of the information involved in this process must remain confidential, and everything possible will be done to protect the privacy of the people involved.

As the first step in this process, an exposed employee will be provided with the following confidential information:

- documentation of the routes of exposure and circumstances under which the exposure incident occurred
- identification of the source individual (unless protected by law)

(As previously stated, most exposure to bodily fluids will be the result of a workplace accident, and this information will be known.)

Next, if possible, the source individual's blood will be tested to determine whether the Hepatitis B Virus (HBV) and the Human Immunodeficiency Virus (HIV) is present. This information will be made available to the exposed employee, if it is obtained. At that time, the employee will be made aware of any applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual.

Finally, the blood of the exposed employee is collected and tested for HIV and HBV, if needed.

Once these procedures have been completed, an appointment is arranged for the exposed employee with a qualified health care professional to discuss the employee's medical status. This includes an evaluation of any reported illnesses, as well as any recommended treatment.

Information Provided to Health-Care Professionals

To assist health-care professionals, [company name] forwards a number of documents to them, including the following:

- a description of the exposure incident
- the exposed employee's relevant medical records
- any other pertinent information

The Health-Care Professionals' Written Opinion

After the consultation, health-care professionals will provide [company name] with a written opinion evaluating the exposed employee's situation. In turn, a copy of this opinion will be furnished to the exposed employee.

In keeping with this process's emphasis on confidentiality, the written opinion will contain only the following information:

- whether the Hepatitis B vaccination is indicated for the employee
- whether the employee has received the Hepatitis B vaccination
- confirmation that the employee has been informed of the results of the evaluation
- confirmation that the employee has been told about any medical conditions resulting from the exposure incident that require further evaluation or treatment

All other findings or diagnoses will remain confidential and will not be included in the written report.

Medical Record Keeping

To ensure that as much medical information as possible is available to the participating health-care professionals, comprehensive medical records will be kept on employees.

_____ is responsible for setting up and maintaining these records, which include _____ (Employee Name) the following information:

- name of employee
- social security number of employee
- copies of the results of the examinations, medical testing and follow-up procedures that took place because of an employee's exposure to bloodborne pathogens
- a copy of the information provided to the consulting health-care professional

As with all personal information, it is important that all medical records be kept confidential. They will not be disclosed or reported to anyone without an employee's written consent (except as required by law).

Exposure Incident Investigation Form

Date of Incident: _____ Time of Incident: _____

Location: _____

Potentially Infectious Materials Involved:

Type: _____ Source: _____

Circumstances (work being performed, etc.): _____

How Incident Was Caused (accident, equipment malfunction, etc.): _____

Personal Protective Equipment Being Used: _____

Actions Taken (decontamination, clean-up, reporting, etc.): _____

Recommendations for Avoiding Repetition: _____

Report Prepared by: _____ Date: _____

Supervisor: _____ Date: _____

Post-Exposure Evaluation and Follow-Up Checklist

The following steps must be taken and information transmitted in the case of an employee's exposure to bloodborne pathogens:

Employee's Name: _____

ACTIVITY	DATE
Employee furnished with documentation regarding exposure incident.	_____
Source individual identified: _____ Yes _____ No	_____
Source individual's blood collected and tested and results given to exposed employee.	_____
_____ Consent from source individual could not be obtained.	
Exposed employee's blood collected and tested.	_____
Appointment arranged for employee with health-care professional.	_____
Documentation forwarded to health-care professional.	_____
_____ Description of exposed employee's duties	
_____ Description of exposure incident, including routes of exposure	
_____ Result of source individual's blood testing	
_____ Employee's medical records	

Information and Training

Having well-informed and trained employees is extremely important when attempting to eliminate or minimize employees' exposure to bloodborne pathogens. For this reason, all employees who have the potential for exposure to bloodborne pathogens are put through a comprehensive training program and furnished with as much information as possible on this issue.

Employees will be retrained at least annually to keep their knowledge current. Additionally, all new employees, as well as employees changing jobs or job functions, will be given any additional training their new position require at the time of their new job assignment.

_____ is responsible for seeing that all employees who have the possibility

(Employee Name)

of being exposed to bloodborne pathogens receive this training.

A. Training Topics

The topics to be covered in our training program include, but are not limited to, the following:

- the Occupational Safety and Health Administration's (OSHA's) Bloodborne Pathogens Standard

- the epidemiology and symptoms of bloodborne diseases
- the modes of transmission of bloodborne pathogens
- [Company name] exposure control plan (and where employees can obtain a copy)
- appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious material
- a review of the use and limitations of methods that will prevent or reduce exposure, including:
 - engineering and work practice controls
 - personal protective equipment
- selection and use of personal protective equipment, including:
 - types available
 - proper use
 - location
 - removal
 - handling
 - decontamination
 - disposal
 - actions to take and people to contact in an emergency involving blood or other potentially infectious materials
 - the procedures to follow if an exposure occurs, including the incident reporting
 - information on the facility-provided post-exposure evaluation and follow-up, including medical consultation.

B. Training Methods

[Company name's] training presentations make use of several training techniques including, but not limited to, those checked below:

_____ classroom-type atmosphere with personal instruction

_____ videotape programs

_____ training manuals and employee handouts

_____ employee review sessions

_____ other

Because we feel employees need an opportunity to ask questions and interact with their instructors, time is set aside specifically for these activities in each training session.

C. Record Keeping

To facilitate the training of employees, as well as to document the training process, training records containing the following information are maintained:

- dates of all training sessions
- contents/summary of the training sessions
- names and qualifications of instructors

- names and job titles of employees attending the training sessions

These training records are available for examination and copying to employees and their representatives, as well as OSHA and its representatives.

