

## Bloodborne Pathogen/Medical Sharps Exposure Control Plan Suggested Step-by-Step Implementation Process for Counties

1. A person should be designated to coordinate and/or be responsible to implement the BBP/Med Sharps Program for the County.

The following person is assigned as the contact person for the [name of county] County Bloodborne Pathogens Exposure Control Plan.

Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Phone: \_\_\_\_\_

2. List all county-owned facilities and basic occupant and contact person information. (Form provided below).

NOTE\*\* - It may be necessary to contact the County Auditor or whoever may be knowledgeable about facilities belonging to the County.

3. Review each facility and determine if occupational exposure to bloodborne pathogens exists for any of the jobs (including contracted work) conducted at the facility. (Include County-owned facility leased/operated by other parties, and any non-owned facilities in which county employees work.)

*Occupational Exposure* – “A reasonably anticipated skin, eye, mucous membrane, or parenteral (piercing mucous membranes or the skin barrier) contact with blood or other potentially infectious materials that may result from the performance of an employee’s duties.”

County-Owned Facility	Address	Contact Person	“Occupational Exposure” Exists	Operated by
Courthouse	1234 Main Anytown, TX	Joe Manyhats	No	Tejas County
County Hospital	#3 Injury St. Anytown, TX	Dr. Dracula	Yes	If-Care, Inc.
County Jail	45 Felon Way Anytown, TX	Chief Deputy Howie Bustem	Yes	Tejas County

4. Use the above information to include facilities operated by someone other than the County. The contract for operation at these facilities should be reviewed to clarify who will be responsible for the requirements of the mandated Bloodborne Pathogen & Medical Sharps Program.

In the absence of a clearly written contractual agreement, the County may be responsible for the plan, including cost of vaccinations and or medical follow up to exposures.

This is due to the definition of “Employee” stated in the law and corresponding TDH rules, which reads:

“Employee” - an individual who works for a governmental unit or on premises owned or operated by a governmental unit, whether or not he or she is directly compensated by the governmental unit.

5. For each "facility" you should develop:
- i) a list of specific job classifications in which all employees in that job classification have occupational exposure to BBP in connection with medical sharps, and
  - ii) a list of specific job classifications in which some employees have occupational exposure to BBP in connection with medical sharps.

This may require the assistance of a contact person at each facility. It is probably necessary for the coordinator to meet with someone at that facility to conduct a proper determination of exposure.

Another method would be to assign this responsibility to someone at each facility, as long as they have appropriate information and training to make a successful exposure determination for the various job classifications.

NOTE\*\* Although the regulations apply to bloodborne pathogen exposures in connection with medical sharps, it is advisable that the County not rule out job classifications with other reasonable occupational exposures to bloodborne pathogens in order to better protect County employees and resources.

6. After the types and nature of bloodborne pathogen exposures are identified for each facility, the coordinator and someone from that facility should draft a site specific Exposure Control Plan (including someone at that site to be responsible for carry out the plan). Facilities where no exposures to bloodborne pathogen are identified should remain on the list for subsequent annual review, but no exposure control plan need be developed.
7. Once all the site-specific plans have been developed, they should be compiled together, along with a county-wide policy on Bloodborne Pathogens and submitted to Commissioners Court for approval to proceed with the plan. It is encouraged that all elected officials adopt the policy by signature, as well.
8. Once these plans are adopted, send basic information to all employees regarding bloodborne pathogen hazards and controls in the work setting.
9. Notification should go out to employees that the new law requires the County to develop an exposure control plan for those jobs that have “occupational exposure” to Bloodborne Pathogens related to the use of “medical sharps”. Be sure to define these terms and include a contact person and a method for employees to inquire and/or request to be included the program. The County may want to develop a special review process for these requests to appropriately determine if they actually have occupational exposures.
10. See attached samples of:
  - Brochure Regarding Bloodborne Pathogens
  - Letter to employees
  - Self-Evaluation Worksheet for Employees
11. Compile a complete listing of employees to be covered by the Bloodborne Pathogens program from each facility.

12. Prepare training materials appropriate to the type of bloodborne pathogen exposures for those employees identified. See the Sample Exposure Control Plan for details on training specifics.
13. Schedule and complete training for all affected employees and their supervisors.
14. Develop a module of training for newly hired employees who will have occupational exposure to bloodborne pathogens.
15. Within 10 days of the training, offer vaccinations for the Hepatitis B Virus (HBV) to employees who have "occupational exposure". The offer should explain to employees that the vaccine will be given at no cost to them - even if they decline now and choose to receive the vaccination later. Those declining should sign a statement to show they are aware of their occupational exposure and that they have been offered the vaccination.
16. Schedule the HBV vaccinations. The County should have budget provision to pay for these vaccinations directly and at no cost to the employee. HBV vaccination serum is available for purchase on State contract prices. See your local health department for information regarding vaccination.
17. The coordinator should develop a recordkeeping system in accordance with the Exposure Control Plan and rules of the Texas Department of Health, including a reporting system for incidents involving medical sharps. The appropriate forms developed by the Texas Department of Health should be used. A sharps injury log should be kept as well.
18. The coordinator should choose a time for annual review of the program, as well as who will be conducting the review. That review should be site-specific, as well.

## MEMORANDUM

To: All County Employees

From: County Loss Control Coordinator

Date: August 20, 2001

Subject: County Bloodborne Pathogen Exposure Control Plan

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As a concern for your health and to meet requirements of new laws, the County is in the process of developing an exposure control plan to protect county employees from the potential health hazards of contact with bloodborne pathogens and medical sharps.

In order to best implement this plan, the County must identify jobs within the County where there is potential for occupational exposure to bloodborne pathogens and infections.

Please review the attached brochure that outlines the hazards and precautions you should be aware of regarding bloodborne pathogens.

If you feel that you have an occupational exposure to such hazards, please fill out the attached form (*Occupational Exposure to Bloodborne Pathogen - Self Evaluation Worksheet*) and return it as soon as possible. The County may review your job in more detail to determine if your job duties would cause you to be affected by this new program. This review for current jobs is scheduled for completion in the next 45 days, so please respond as quickly as possible.

There will be a process for ongoing reviews should your job duties change in a way which could expose you to bloodborne pathogens.

Employees having jobs with occupational exposures to bloodborne pathogens/medical sharps will be required to attend special training and follow special safety procedures to minimize their risks.

If you have questions regarding the program, feel free to contact your supervisor, or contact me at [phone number].

Thanks for your cooperation in making our County a safer place to work!

## Occupational Exposure to Bloodborne Pathogen Self Evaluation Worksheet

Name: \_\_\_\_\_  
 Job Classification or Title \_\_\_\_\_  
 Dept. or Office \_\_\_\_\_  
 County Facility or Bldg. \_\_\_\_\_

**Instructions**

Please answer the following questions to assist in determining if your job duties could expose you to potential bloodborne diseases. Refer to the definitions on the back of this form to assist you with your answers.

Brief Description of Duties: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Please place a check the appropriate box on the right side of the table regarding the duties of your job.

Does your job require you to do any of the following?

Question	Yes	No	Not Sure
1. Perform any task dealing with medical sharps such as hypodermic needles?			
2. Perform any task dealing with glass equipment, instruments, or tools that could come in contact with blood or other potentially infected materials?			
3. Handle garbage, waste, or refuse that is known to contain materials contaminated with blood or other potentially infectious materials?			
4. Handle garbage, waste, or refuse that possibly contains blood, materials contaminated with blood, or other potentially infectious materials?			
5. Handle laundry that possibly contains blood, materials contaminated with blood, or other potentially infectious materials?			
6. Work with people in a setting or situation where there is a reasonable expectation that you could come in contact with their blood and/or other potentially infectious materials.			
7. Administer job-related first aid?			
8. Clean, disinfect, or decontaminate equipment, vehicles, tools, or work areas which have may come in contact with blood or other potentially infectious materials?			

If you need assistance in determining the appropriate answers, please consult with your supervisor or you may call on the coordinator of this safety effort. Please return your form to:

Name of Coordinator: \_\_\_\_\_  
 Phone \_\_\_\_\_  
 Mail address \_\_\_\_\_  
 e-mail: \_\_\_\_\_

## ***Glossary of terms***

**Blood** means human blood, human blood components, and products made from human blood.

**Contaminated** means the presence or the reasonably anticipated presence of blood or other potentially infectious materials on an item or surface.

**Other Potentially Infectious Materials** means the following human body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, 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

**Contaminated Sharps** means any contaminated object that can penetrate the skin including, but not limited to, needles, scalpels, broken glass, broken capillary tubes, and exposed ends of dental wires.

**Decontamination** means the use of physical or chemical means to remove, inactivate, or destroy

**Occupational Exposure** means reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties.