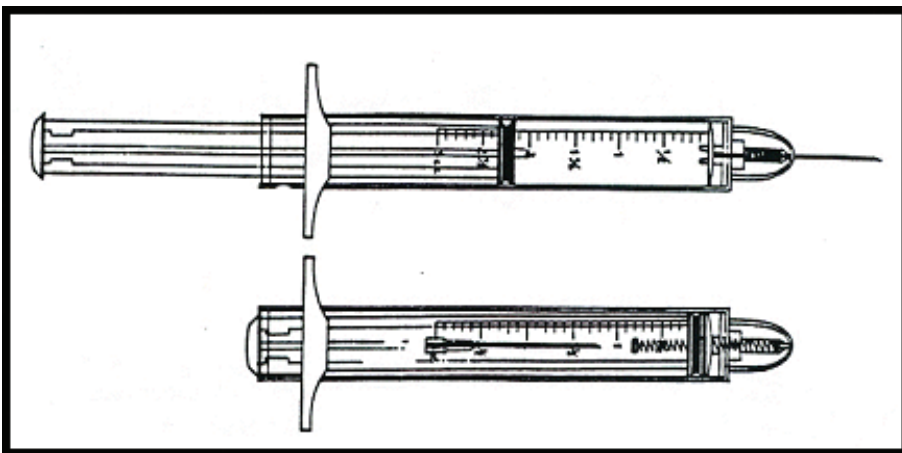

Bloodborne Pathogens

Exposure Control Plan



The Texas Department of Insurance,
Division of Workers' Compensation (TDI-DWC)

Provided by
Workplace Safety

HS96-089C (10/09)

Bloodborne Pathogens Exposure Control Plan Self-Audit Checklist

Yes No Date
 Corrected

Does the Exposure Control Plan identify in writing:

- | | | | |
|--------------------------|--------------------------|----------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • All employees who have a reasonable likelihood of occupational exposure during the performance of their assigned duties without regard to the use of personal protective equipment; |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • The schedule and procedures for implementing ALL the provisions of the Standard; |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • The method for evaluation of exposure incidents that allow appropriate corrective action to be taken? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Does management solicit input from non-managerial employees in the identification and selection of effective engineering and work practice controls? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Has a mechanism been established for annual review of the Exposure Control Plan? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Is the Exposure Control Plan accessible to all employees? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Do you have a written policy that adopts the use of “universal precautions” for the handling of blood and potentially infectious materials to reduce the risk of occupational exposure? |

Does the Exposure Control Plan identify the:

- | | | | |
|--------------------------|--------------------------|----------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Engineering controls that will be used to reduce occupational exposure; |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Schedule for regular inspection and replacement of engineering controls; |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Schedule and method for determining the need for replacement of sharps containers? |

Are there written policies (if applicable) that:

- | | | | |
|--------------------------|--------------------------|----------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Prohibit recapping of needles using a two-handed technique; |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Prohibit removal of needles from syringes by hand; |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Prohibit bending, shearing, or breaking of contaminated needles; |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Specify the situations where recapping is allowed and the safe practices or devices that are required to reduce the risk of injury; |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Specify the safe practices to be used when handling, or reprocessing reusable sharps; |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="text"/> | • Require the use of mechanical means (such as a brush and dust pan, or tongs) to clean up broken glassware? |

Yes No Date
Corrected

Are the containers used to store or transport contaminated reusable sharps:

- _____ • Puncture-resistant and leakproof;
- _____ • Red in color and labeled with the BIOHAZARD symbol?

Are containers used for disposal of contaminated sharps:

- _____ • Closeable, puncture-resistant, leakproof on sides and bottom;
- _____ • Red in color or labeled with the BIOHAZARD symbol;
- _____ • Located as close as possible to the immediate area of use;
- _____ • Located in areas where sharps may not normally be used, but can be reasonably anticipated to be found, such as the laundry;
- _____ • Replaced routinely and not allowed to overfill;
- _____ • Maintained in an upright position during transport?

Are handwashing facilities reasonably accessible to employees?

- _____ **If handwashing facilities with soap and running water are not accessible, are appropriate alternatives provided, such as antiseptic hand cleansers or towelettes?**

- _____ **Are employees instructed about not eating, drinking, smoking, applying cosmetics or lip balm, or handling contact lenses in contaminated work areas?**

- _____ **Are food and drink prohibited from storage in refrigerators, freezers, shelves, cabinets, or counter tops where blood and other potentially infectious materials are present?**

- _____ **Are employees who could be expected to perform procedures that may create splashing or spraying of blood or other potentially infectious materials trained to perform such procedures in a manner that reduces risk of exposure?**

Are employees (if applicable) trained:

- _____ **To recognize specimen containers as containing potentially infectious materials;**
- _____ **To use “universal precautions” when handling all specimens;**
- _____ **If not, are the containers red or labeled with the BIOHAZARD symbol?**
- _____ **Are containers that are used to transport medical specimens appropriately labeled?**
- _____ **Are employees instructed to place all specimen containers that may be contaminated or leak in a secondary container that is leak-resistant or, if necessary, puncture-resistant?**
- _____ **Is contaminated equipment decontaminated prior to servicing?**
- _____ **If unable to be decontaminated, is it labeled and does it specify which portions of the equipment remain contaminated?**

Yes No Date
Corrected

Are employees (if applicable) trained: (cont.)

- _____ Is there a mechanism for repairing, replacing, reprocessing protective barriers and clothing?
- _____ Are barrier devices provided for use in emergency CPR?
- _____ Are employees trained in the proper selection, indications, mandated use, and proper procedures for disposal or reprocessing of personal protective equipment?
- _____ Have employee job duties with occupational exposure been reviewed to determine what protective clothing must be provided?

Is appropriate personal protective clothing for the tasks performed provided to employees:

- _____ • At no cost;
- _____ • In appropriate sizes;
- _____ • In accessible locations;
- _____ • Effective in preventing the penetration of blood and other potentially infectious materials?
- _____ Is a mechanism in place for cleaning, laundering, or disposing, of employees' protective clothing?
- _____ Is there a mechanism for replacement or washing of an employee-owned uniform or clothing if it becomes contaminated?

Does employee training include:

- _____ • Indications for selection, proper use, replacement, and disposal of protective clothing;
- _____ • The need to remove protective clothing prior to leaving the work area and when it becomes penetrated by blood and other potentially infectious materials?

Are gloves made available to employees:

- _____ • In accessible locations;
- _____ • Suitable for the tasks being performed?

Are gloves required to be worn:

- _____ • When there is reasonable likelihood of contact with blood and other potentially infectious materials;
- _____ • During all vascular access procedures;
- _____ • When there is contact with mucous membranes and non-intact skin;
- _____ • When contaminated items or surfaces are handled?
- _____ • Are alternative gloves available to employees who are allergic to those normally provided?

Yes No

Date
Corrected

Are gloves required to be worn: (cont.)

_____ Are face and eye protection provided when, for instance, following an accident there is a potential for splashing, spraying, or splattering of blood or potentially infectious materials?

_____ If glasses are used as protective eyewear, do they have shields?

Is there a written procedure for cleaning and decontamination of:

_____ • Environmental surfaces, e.g., floors;

_____ • Work surfaces;

_____ • Equipment?

Has a written procedure been established for reusable trash receptacles that hold contaminated items, including:

_____ • A regular schedule for inspection and decontamination of containers;

_____ • Procedures for cleaning and decontamination when visibly contaminated?

Are there written procedures for bagging, handling, and transporting of contaminated laundry that:

_____ • Prohibit the sorting or rinsing in guest areas;

_____ • Specify the types of bags or containers that will be used to prevent leakage;

_____ • Specify the alternative labeling when "universal precautions" are used for handling all contaminated laundry?

_____ Does your employee training cover all procedures for identifying, bagging, handling, and transporting of contaminated laundry?

Are the containers for regulated waste:

_____ • Closeable;

_____ • Able to prevent leakage of fluids;

_____ • Labeled with the BIOHAZARD symbol or colored red?

_____ Are employees instructed to close all regulated waste containers prior to removal to prevent spillage during handling, transporting, or shipping?

_____ Do policies and procedures identify the responsibility of department heads, managers and employees in complying with the recommended practices?

Do these policies and procedures include:

_____ • The responsibility of the employee;

_____ • Recommended practices;

_____ • How compliance monitoring will be done;

_____ • How noncompliance will be reported and documented;

_____ • How follow-up will be conducted;

Yes No

Date
Corrected

Do these policies and procedures include: (cont.)

_____ • The action to be taken for noncompliance; e.g., disciplinary action, if necessary?

_____ Has a determination been made of which employees have potential occupational exposure and are eligible for Hepatitis B vaccination?

Is the Hepatitis B vaccine provided to all employees with potential occupational exposure:

_____ • Free of charge;

_____ • At a reasonable time and place convenient to the employee;

_____ • In accordance with U.S. Public Health Service recommendations?

Has a mechanism been established to offer the vaccine to:

_____ • Current employees;

_____ • New employees within ten days of their initial assignment?

Is specific training provided prior to vaccination that includes information on:

_____ • The Hepatitis B vaccine;

_____ • Its safety, efficacy, and methods of administration;

_____ • The benefits of being vaccinated;

_____ • The right to decline vaccination and have it still be provided upon request at a later date?

_____ Do employees who decline vaccination sign a declination statement?

_____ Has a mechanism been established to obtain a written opinion from the evaluating health care professional on the vaccination status of each employee?

_____ Is a copy of this written opinion provided to the employee?

_____ Are all other employee health records containing medical findings and diagnoses kept confidential?

_____ Are records maintained of the vaccination status of all employees who have a potential occupational exposure?

_____ Have exposure incidents been defined?

Has a mechanism been established to:

_____ • Document the route(s) of exposure and circumstances under which all exposure incidents occur;

_____ • Evaluate exposure incidents that allow corrective action to be taken?

Yes No Date Corrected

Is a confidential medical evaluation and follow-up provided immediately following exposure incidents, including:

- _____ • Evaluation of the exposure incident;
- _____ • Collection and testing of the source individual's blood for HBV and HIV serological status, if not already known;
- _____ • Post-exposure prophylaxis when medically indicated, as recommended by the U.S. Public Health Service at the time of the exposure;
- _____ • Counseling;
- _____ • Evaluation of any reported illnesses related to the exposure incident?
- _____ Is information on the results of the source individual's blood testing provided to the employee?
- _____ Are there procedures that specify what should be done if consent cannot be obtained from the source individual?
- _____ **Are baseline blood samples from exposed employees who initially decline HIV testing held for 90 days?**
- _____ • Is there a policy that provides for testing these samples from the source individual?

Is the evaluating health care professional provided with:

- _____ • A copy of the Standard;
- _____ • A description of the exposed employee's duties as they relate to the exposure incident;
- _____ • Documentation of the route(s) of exposure and circumstances under which the exposure occurred;
- _____ • Results of the source individual's blood testing, if available;
- _____ • All medical records relevant to treatment of the employee including vaccination status?

Is the employer provided with a copy of the evaluating health care professional's written opinion, which includes information that the employee has been informed about:

- _____ • The results of the medical evaluation;
- _____ • Any medical conditions that may arise from exposure that may require further treatment?
- _____ Are needlestick injuries and other exposure incidents that result in medical treatment or seroconversion recorded on the OSHA-U.S.A. 300 Log and/or local summary of occupational injuries or illnesses?
- _____ Is identifying information related to bloodborne pathogens removed prior to granting access to the records?

Yes No Date
Corrected

Is the employer provided with a copy of the evaluating health care professional's written opinion, which includes information that the employee has been informed about: (cont.)

- _____ Does employee training include information on the actions to be taken following an exposure incident, including the reporting methods, and the availability of medical follow-up?
- _____ When indicated, is the universal BIOHAZARD symbol always used in conjunction with the word "BIOHAZARD"?

Are there written procedures that outline the specific labeling required for:

- _____ • Specimens if universal precautions are not observed for handling all specimens;
- _____ • Laundry bags if "universal precautions" are not observed for handling all laundry;
- _____ • Refrigerators and freezers that contain blood or other potentially infectious materials;
- _____ • Containers used to store, transport, or ship regulated waste, blood, other potentially infectious materials;
- _____ Sharps disposal containers;
- _____ • Contaminated equipment that is sent for servicing or repair?

Is a mechanism in place to provide training:

- _____ • To all current employees as soon as possible;
- _____ • To new employees at the time of initial employment?

Is training provided to all employees with potential occupational exposure as defined in the Exposure Control Plan:

- _____ • At no cost to the employee;
- _____ • During working hours;
- _____ • At a reasonable location;
- _____ • Training records are maintained for 3 years from the date of the training;
- _____ • By an individual who is knowledgeable in the subject matter?

Does the training include:

- _____ • An accessible copy of the regulatory text of the Standard;
- _____ • A general explanation of the epidemiology and symptoms of bloodborne diseases;
- _____ • An explanation of the modes of transmission of bloodborne pathogens;

Yes No Date
 Corrected

Does the training include: (cont.)

- | | | | |
|--------------------------|--------------------------|-------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • An explanation of the employer’s Exposure Control Plan and the means by which the employee can obtain a copy of the written plan; |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • An explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials; |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • An explanation of the use and limitations of methods that will prevent or reduce exposure, including appropriate engineering controls, work practices, and personal protective equipment; |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • Information on the types, proper use, location, removal, handling, decontamination, and disposal of personal protective equipment; |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • An explanation of the basis for selection of personal protective equipment; |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • Information on the Hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine and vaccination will be offered free of charge; |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • Information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials; |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available; |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • Information on the post-exposure evaluation and follow-up required to be provided to an employee following any exposure incident; |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • An explanation of the signs and labels and/or color coding used to identify hazards; |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • An opportunity for interactive questions and answers with the person conducting the training? |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | Is the training appropriate in content, language, and vocabulary to the educational, literacy, and language background of the employee? |

Are written training records kept for three years which include:

- | | | | |
|--------------------------|--------------------------|-------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • The dates of the training sessions; |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | • The contents or a summary of the training? |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | Is there a mechanism to ensure that medical records are kept confidential? |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ | Do employees have access to their medical records? |