
Point-of-Care/CLIA Webinar Prep Series

Getting Your Pharmacy Started!

OSHA-Compliance



Pennsylvania
Pharmacists
Association

Presenters

Lucas A. Berenbrok, PharmD, MS, BCACP

Assistant Professor of Pharmacy & Therapeutics

University of Pittsburgh School of Pharmacy

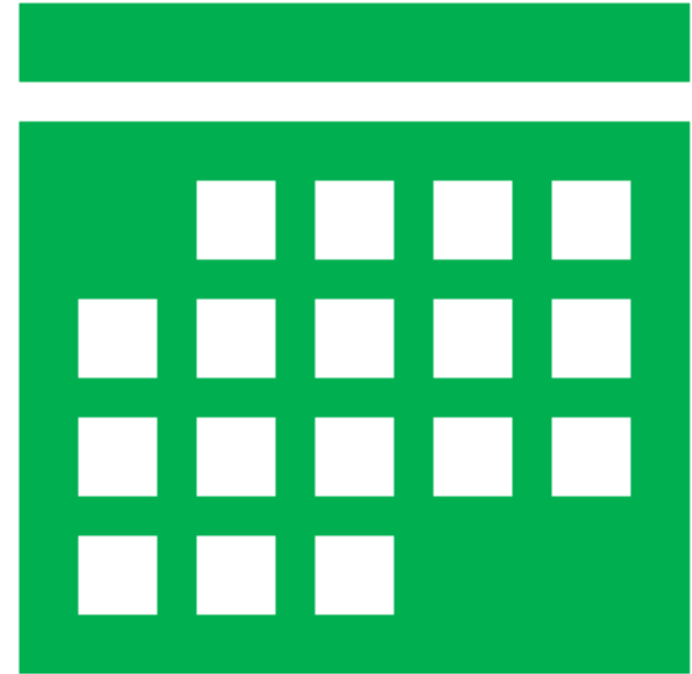
Objective

To help 20 pharmacists implement a point-of-care testing program in 2018-2019



Webinar Prep Series

1. Overview
2. CLIA Application
3. CLIA Waived Equipment
4. Laboratory Director & Staff
- 5. OSHA-Compliance**
6. Policies and Procedures/Wrap Up



Ready? Set? Test! Patient Testing is Important. Get the Right Results.

This booklet describes recommended practices for physicians, nurses, medical assistants, pharmacists, and others who perform patient testing under a CLIA Certificate of Waiver.



Occupational Safety and Health Act (OSHA)

Under the Occupational Safety and Health Act of 1970, employers are responsible for providing safe and healthful workplaces for their employees. OSHA's role is to ensure these conditions for America's working men and women by setting and enforcing standards, and providing training, education and assistance. For more information, visit www.osha.gov or call OSHA at [1-800-321-OSHA \(6742\)](tel:1-800-321-OSHA).

Needlestick Safety and Prevention Act

(Pub. L. 106-430)

Revised the Bloodborne Pathogens Standard in 2001

Requires employers to identify, evaluate, and implement safer medical devices

Clarifies what is meant by “engineering controls”

OSHA Bloodborne Pathogens Standard

(29 CFR 1910.1030)

To reduce the potential exposure of personnel to blood borne pathogens

All U.S. laboratories are required to comply at all times

All personnel who collect, handle, or test human specimens must comply

OSHA Bloodborne Pathogens Standard (29 CFR 1910.1030)

The requirements include

- A written plan for exposure control
- Use of universal precautions
- Use of safer, engineered needles and sharps
- Use of personal protective equipment (PPE)
- Provision of hepatitis B vaccination at no cost
- Safety training for handling blood, bloodborne pathogens, and other infection materials
- Equipment for the safe handling and disposal of biohazardous waste

Highlights

- Provide personal protective equipment (PPE)
- Make available hepatitis B vaccinations
- Make available post-exposure evaluation and follow-up
- Provide information and training to workers

FactSheet

OSHA's Bloodborne Pathogens Standard

Bloodborne pathogens are infectious microorganisms present in blood that can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV), hepatitis C virus (HCV), and human immunodeficiency virus (HIV), the virus that causes AIDS. Workers exposed to bloodborne pathogens are at risk for serious or life-threatening illnesses.

Protections Provided by OSHA's Bloodborne Pathogens Standard

All of the requirements of OSHA's Bloodborne Pathogens standard can be found in Title 29 of the Code of Federal Regulations at 29 CFR 1910.1030. The standard's requirements state what employers must do to protect workers who are occupationally exposed to blood or other potentially infectious materials (OPIM), as defined in the standard. That is, the standard protects workers who can reasonably be anticipated to come into contact with blood or OPIM as a result of doing their job duties.

In general, the standard requires employers to:

- **Establish an exposure control plan.** This is a written plan to eliminate or minimize occupational exposures. The employer must prepare an exposure determination that contains a list of job classifications in which all workers have occupational exposure and a list of job classifications in which some workers have occupational exposure, along with a list of the tasks and procedures performed by those workers that result in their exposure.
- **Employers must update the plan annually** to reflect changes in tasks, procedures, and positions that affect occupational exposure, and also technological changes that eliminate or reduce occupational exposure. In addition, employers must annually document in the plan that they have considered and begun using appropriate, commercially-available effective safer medical devices designed to eliminate or minimize occupational exposure. Employers must also document that they have solicited input from frontline workers in identifying, evaluating, and selecting effective engineering and work practice controls.
- **Implement the use of universal precautions** (treating all human blood and OPIM as if known to be infectious for bloodborne pathogens).
- **Identify and use engineering controls.** These are devices that isolate or remove the bloodborne pathogens hazard from the workplace. They include sharps disposal containers, self-sheathing needles, and safer medical devices, such as sharps with engineered sharps-injury protection and needleless systems.
- **Identify and ensure the use of work practice controls.** These are practices that reduce the possibility of exposure by changing the way a task is performed, such as appropriate practices for handling and disposing of contaminated sharps, handling specimens, handling laundry, and cleaning contaminated surfaces and items.
- **Provide personal protective equipment (PPE), such as gloves, gowns, eye protection, and masks.** Employers must clean, repair, and replace this equipment as needed. Provision, maintenance, repair and replacement are at no cost to the worker.
- **Make available hepatitis B vaccinations to all workers with occupational exposure.** This vaccination must be offered after the worker has received the required bloodborne pathogens training and within 10 days of initial assignment to a job with occupational exposure.
- **Make available post-exposure evaluation and follow-up to any occupationally exposed worker who experiences an exposure incident.** An exposure incident is a specific eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood or OPIM. This evaluation and follow-up must be at no cost to the worker and includes documenting the route(s) of exposure and the circumstances

Complying with the Standard

Information for Employers


Complying with OSHA's Bloodborne Pathogens Standard

The Bloodborne Pathogens Standard applies to employees who have **occupational exposure** (reasonably anticipated job-related contact with blood or other potentially infectious materials).

The three most common bloodborne pathogens (BBPs) are human immunodeficiency virus (HIV), hepatitis B virus (HBV), and hepatitis C virus (HCV).

Centers for Disease Control and Prevention
National Institute for Occupational Safety and Health
1600 Clifton Road, NE
Atlanta, GA 30333
Phone: 1-800-CDC-INFO (1-800-232-4636)
TTY: 1-888-232-6348
Email: cdcinfo@cdc.gov
Visit the NIOSH Web site at www.cdc.gov/niosh.
For a monthly update on news at NIOSH, subscribe to NIOSH eNews by visiting www.cdc.gov/niosh/eNews.
NIOSH (NIOSH) Publication No. 2009-111
March 2009

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NIOSH
CDC
OSHA

This flyer is being sent to employers as an aid to understand the Occupational Safety and Health Administration (OSHA) Bloodborne Pathogens Standard, which seeks to prevent serious occupational infections.

OSHA
Bloodborne Pathogens and Needlestick Prevention
www.osha.gov/SLTC/bloodbornepathogens/index.html

OSHA Federal and State Plans Offices
www.osha.gov/html/oshdir.html
www.osha.gov/dcspp/osp/index.html

CDC
NIOSH Bloodborne Pathogens Topic Page
www.cdc.gov/niosh/topics/bbp

Protecting Healthcare Workers from Bloodborne Pathogens
www.cdc.gov/ncidod/dhqp/wrkrProtect_bp.html

Publications/Web Documents
Sharps Safety Workbook (2004)
www.cdc.gov/sharpsafety

Model Plans and Programs for the OSHA Bloodborne Pathogens and Hazard Communications Standards (2003)
OSHA Publication No. 3186
www.osha.gov/Publications/osh3186.pdf

Medical & Dental Offices: A Guide to Compliance with OSHA Standards (2003)
OSHA Publication No. 3187
www.osha.gov/Publications/osh3187.pdf

NIOSH Alert: Preventing Needlestick Injuries in Health Care Settings (1999)
DHHS (NIOSH) Publication No. 2000-108
www.cdc.gov/niosh/2000-108.html

<https://www.cdc.gov/niosh/docs/2009-111/pdfs/2009-111.pdf?id=10.26616/NIOSH PUB2009111%20>

Safety Issues

Follow OSHA safety guidelines

Wear appropriate personal protective equipment (PPE)

Clean hands and change gloves between patients

Follow work practices that reduce risk of exposure

Biohazardous Waste

Biohazard bags; sharps containers

Regulated waste is

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

Blood/Body Fluid Exposure

Use universal precautions

Report exposures to those managing exposures

Follow exposure control plan, post-exposure evaluation, and follow-up

Model Exposure Control Plan

APPENDIX D MODEL EXPOSURE CONTROL PLAN

The Model Exposure Control Plan is intended to serve employers as an example exposure control plan which is required by the Bloodborne Pathogens Standard. A central component of the requirements of the standard is the development of an exposure control plan (ECP).

The intent of this model is to provide small employers with an easy-to-use format for developing a written exposure control plan. Each employer will need to adjust or adapt the model for their specific use.

The information contained in this publication is not considered a substitute for the OSH Act or any provisions of OSHA standards. It provides general guidance on a particular standard-related topic but should not be considered a definitive interpretation for compliance with OSHA requirements. The reader should consult the OSHA standard in its entirety for specific compliance requirements.

POLICY

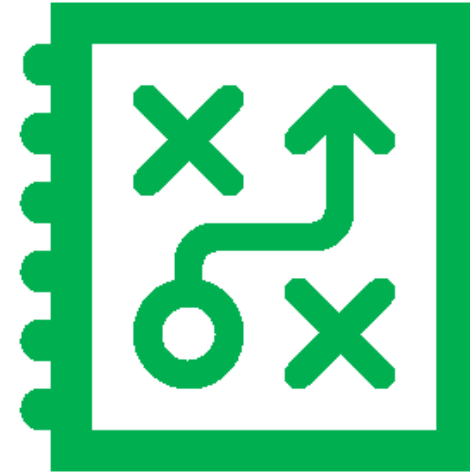
The *(Facility Name)* is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this endeavor, the following exposure control plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with OSHA standard 29 CFR 1910.1030, "Occupational Exposure to Bloodborne Pathogens."

The ECP is a key document to assist our firm in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP includes:

- * Determination of employee exposure
- * Implementation of various methods of exposure control, including:
 - Universal precautions
 - Engineering and work practice controls
 - Personal protective equipment
 - Housekeeping
- * Hepatitis B vaccination
- * Post-exposure evaluation and follow-up
- * Communication of hazards to employees and training
- * Recordkeeping
- * Procedures for evaluating circumstances surrounding an exposure incident

OSHA Resources

Compliance Assistance Quick Start
Health Care Industry
8 Steps with resources



https://www.osha.gov/dcsp/compliance_assistance/quickstarts/health_care/index.html

Resources from the Centers for Disease Control and Prevention (CDC)

Healthcare-associated Infections

Preventing Healthcare-associated Infections

Protecting Healthcare Personnel

Donning and Removing Personal Protective Equipment

Exposure to Blood

Pennsylvania OSHA Area Offices

OSHA Area Offices

Allentown

Erie

Harrisburg

Philadelphia

Pittsburgh

Wilkes-Barre



PA OSHA Consultation Program

The program is designed to assist private-sector employers in the commonwealth in understanding and voluntarily complying with applicable safety/health regulations enforced by the federal Occupational Safety and Health Administration.

CALL, EMAIL, or VISIT WEBSITE

Indiana University of Pennsylvania
Indiana, Pennsylvania

<https://www.iup.edu/pa-oshconsultation/>

Next Session

Thursday, December 20, 8:30-9:30a

Topic: Policies and Procedures/Wrap Up

Presenter: Suzanne Higginbotham

Register Now!

<https://bit.ly/2KRGIZ6>