

# Bloodborne Pathogens Training – Academic Programs

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## OSHA STANDARD SCOPE

The **OSHA Bloodborne Pathogens Standard** applies to all employees who have occupational exposure to blood or other potentially infectious materials (OPIM).

- **Occupational exposure** is defined as 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.
- **Blood** is defined as human blood, human blood components, and products made from human blood.
- **Other potentially infectious materials (OPIM)** is defined as the following: saliva in dental procedures; semen; vaginal secretions; cerebrospinal, synovial, pleural, pericardial, peritoneal, and amniotic fluids; body fluids visibly contaminated with blood; along with all body fluids in situations where it is difficult or impossible to differentiate between body fluids; unfixed human tissues or organs (other than intact skin); HIV-containing cell or tissue cultures, organ cultures, and HIV- or HBV-containing culture media or other solutions; and blood, organs, or other tissues from experimental animals infected with HIV or HBV.

**Volunteers** are not covered by the standard. **Students** are covered if they are compensated.

The University has some **academic programs** that place students in work environments where the student may have an occupational exposure to bloodborne pathogens. For example, the nursing program may place nursing students in hospitals located in other areas to gain valuable clinical experience. OSHA considers the University, who sends their own employees (or students if they are compensated) to work at other facilities, to be employers whose employees may be exposed to hazards. Because the University maintains a continuing relationship with its employees, but another employer (the client or hospital accepting the students) creates and controls the hazard, there is a shared responsibility for assuring that these employees are protected from workplace hazards. The client employer has the primary responsibility for such protection, but the "lessor employer" likewise has a responsibility under the Occupational Safety and Health Act. In the context of OSHA's standard on Bloodborne Pathogens, 29 CFR 1910.1030, the University would be required, for example, to provide the general training outlined in the standard; ensure that employees or compensated students are provided with the required vaccinations; and provide proper follow-up evaluations following an exposure incident. Your clients (or institution accepting the students) would be responsible, for example, for providing site-specific training and personal protective equipment, and would have the primary responsibility regarding the control of potential exposure conditions. The client, of course, may specify what qualifications are required for supplied personnel, including vaccination status. It is certainly in the interest of the lessor employer (the University) to ensure that all steps required under the standard have been taken by the client employer to ensure a safe and healthful workplace for the leased employees. Toward that end, contracts with your clients (or institutions where students are placed) should clearly describe the responsibilities of both parties in order to ensure that all requirements of the standard are met.

## EMPLOYEE TRAINING

All employees who have occupational exposure to bloodborne pathogens receive **initial and annual training**.

- The Biological Safety Officer is responsible for providing training for **research lab personnel** handling human-derived research samples. The Employee Safety Manager is responsible for providing training to personnel in **non-laboratory work areas** with occupational exposure to blood or OPIM. **Academic programs** that place students in work environments where the student may have an occupational exposure to bloodborne pathogens are responsible for providing training to these students. The **supervisor** is responsible for ensuring all personnel with occupational exposure that work under their supervision have completed required training.
- OSHA interprets “annual training” to mean that employees must be provided re-training at least once every 12 months (i.e., within a time period not exceeding 365 days.) This annual training need not be performed on the exact anniversary date of the preceding training, but should be provided on a date reasonably close to the anniversary date taking into consideration the University's and the employees' convenience in scheduling.

In addition, training must be provided **when changes** (e.g., modified/new tasks or procedures) affect a worker's occupational exposure. Part-time and temporary employees are covered and are also to be trained on University time.

All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

- a copy and explanation of the OSHA bloodborne pathogen standard
- an explanation of our ECP and how to obtain a copy
- an explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
- an explanation of the use and limitations of engineering controls, work practices, and PPE
- an explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE
- an explanation of the basis for PPE selection
- information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine will be offered free of charge
- information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM
- 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
- information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
- an explanation of the signs and labels and/or color coding required by the standard and used at this facility
- an opportunity for interactive questions and answers with the person conducting the training session.

## RECORDKEEPING

**Training records** are completed for each employee upon completion of training. The campus, department, operation or laboratory is responsible for training records. These documents will be kept for **at least three years**. The training records include:

- the dates of the training sessions
- the contents or a summary of the training sessions
- the names and qualifications of persons conducting the training
- the names and job titles of all persons attending the training sessions Employee training records are provided upon request to the employee or the employee's authorized representative **within 15 working days**.

## TRAINING GUIDANCE FOR ACADEMIC PROGRAMS

**Academic programs** that place students in work environments where the student may have an occupational exposure to bloodborne pathogens are responsible for providing training to these students. This guide includes a summary of the minimum elements that must be included in the training program. Some elements of training must be customized to apply to the workplace the training will address (e.g. how to obtain a copy of the ECP, tasks that may involve exposure, types and location of PPE). This guide also includes compliance considerations for students working in other non-University facilities. The OSHA Bloodborne Pathogens Standard applies to **students** if they are compensated. The academic program must maintain training records for students required to complete initial and annual training.

The person conducting the training is required to be **knowledgeable** in the subject matter covered by the elements in the training program and be **familiar** with how the course topics apply to the workplace that the training will address. The trainer must demonstrate **expertise** in the area of occupational hazards of bloodborne pathogens. Possible trainers include a variety of healthcare professionals such as infection control practitioners, nurse practitioners, registered nurses, occupational health professionals, physician's assistants, and emergency medical technicians. Non-healthcare professionals, such as but not limited to, industrial hygienists, epidemiologists, or professional trainers, may conduct the training provided they are knowledgeable in the subject matter covered by the elements contained in the training program as it relates to the workplace. One way, but not the only way, knowledge can be demonstrated is the fact that the person received specialized training.

Academic programs can contact EHS with questions regarding bloodborne pathogens compliance. OSHA's Directorate of Training and Education maintains an [online library of training materials](#). OSHA's [Bloodborne Pathogens and Needlestick Prevention Topics Page](#) provides resources that can be used for training. Other sources of information include local, area and regional OSHA offices. In addition, each regional office has a Bloodborne Pathogens Coordinator who answers compliance and related questions.

Students with BBP training questions should contact their department training coordinator.