

Address deficiencies in bloodborne pathogens exposure management

By Dionne Williams, MPH

The Occupational Safety and Health Administration's (OSHA's) inspection history for a particular industry aids in gaining insight into the industry's performance in managing safety and health. In clinical laboratories, looking at the most-cited OSHA violations teaches some important lessons. Safety managers can reduce the risk of needle sticks and bloodborne pathogens exposure to their workers by strengthening areas identified as weak points at other clinical laboratories inspected by OSHA.

OSHA inspection history

During the last two fiscal years, Federal OSHA inspections in clinical laboratories have uncovered more violations of the agency's bloodborne pathogens (BBP) standard than for all other OSHA standards combined.* While clinical laboratories received citations for compliance deficiencies with other OSHA standards, more than 80% of the violations cited by Federal OSHA was related to laboratories failing to adhere to provisions of the BBP standard, 29 CFR 1910.1030.

Among the bloodborne-related deficiencies most commonly encountered by OSHA, clinical laboratories often failed to:

- update the facility's Exposure Control Plan (ECP) at least annually [29 CFR 1910.1030(c)(1)(iv)];

OSHA compliance assistance options

OSHA offers tools employers can use to improve safety and health management. OSHA booklet: Model Plans and Programs for the OSHA Bloodborne Pathogens and Hazard Communications Standards (OSHA 3186 - 2003) provides employers with a sample written ECP from which the facility can model its own site-specific written ECP. The publication can be located on OSHA's site at https://www.osha.gov/pls/publications/publication.search_results?pSearch=bloodborne.

Other bloodborne pathogens-related information can be accessed on OSHA's bloodborne safety and health topics page at www.osha.gov/SLTC/bloodbornepathogens/index.html.

Additionally, OSHA has a healthcare quickstart webpage that can be used to guide facilities in putting together the components of a safety and health management program: https://www.osha.gov/dcsp/compliance_assistance/quickstarts/health_care/index_hc.html.



OSHA standards require labs to provide all necessary personal protective equipment, engineering controls (e.g., sharps containers), labels, and red bags to eliminate or minimize occupational exposure to bloodborne pathogens.

- outline a detailed written plan for compliance with the BBP standard [29 CFR 1910.1030(c)(1)(ii)(B)];
- affix warning labels to regulated waste containers, refrigerators, freezers, or other containers of blood or other potentially infectious materials [29 CFR 1910.1030(g)(1)(i)(A)];
- ensure that all employees with occupational exposure participate in a training program at no cost to the employee [29 CFR 1910.1030(g)(2)(i)]; and
- solicit input in the identification, evaluation, and selection of effective engineering and work practice controls from non-managerial employees who are potentially exposed to injuries from contaminated sharps [29 CFR 1910.1030(c)(1)(v)].

The management of bloodborne pathogens exposure requires a team effort.

Other deficiencies encountered were in the facilities' written ECP and in the implementation and use of sharps with engineered sharps safety devices, or SESIPs.

These commonly identified shortcomings can increase the chances that employees will experience needle sticks or other sharps injuries that could expose them to bloodborne pathogens. Managers can use this information when reviewing areas within their own facilities that may be in need of improvement.

What can managers do?

The management of bloodborne pathogens exposure requires a team effort. Using a team approach to bloodborne exposure management can help facilities avoid some of the major defi-

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iciencies detected during OSHA inspections of clinical laboratories. As a first step to employee safety in any laboratory, managers and facility administrators must recognize that achieving this goal requires active, ongoing involvement on their part as well as on the part of employees.

Employee compliance is essential to employee protection.

The two most frequently violated sections of the BBP standard concern inadequacies in establishing and maintaining the facility's ECP. OSHA requires employers to perform a workplace exposure determination and to list in the facility's ECP all job classifications, tasks, and procedures through which their employees would have occupational exposure to blood or other potentially infectious materials. It is a key component of the overall safety program needed to keep laboratory employees safe; but without



the required annual updates, lab managers run the risk not only of receiving OSHA citations upon inspection but also of leaving critical gaps in employee protection.

Managers must also be vigilant about ensuring that employees are trained and fully informed of all BBP program aspects established for their protection. Ensuring that proper warning labels are affixed to refrigerators, freezers, and other containers is one way of informing employees and preparing them to do their part in taking appropriate precautions to protect themselves from exposure incidents.

Employee training

Formal and informal employee training should also be developed and be performed frequently. As the OSHA inspection history indicates, many facilities fall short in this area as well. Initial employee training goes a long way in garnering employee adherence to established safe practices and procedures. It is important to also keep in mind that employee training requires ongoing and active updates. The OSHA standard requires that employee training be repeated at least annually, but employers must also conduct more frequent updates whenever new procedures or devices are introduced to staff.

Employee buy in

Employee involvement is an essential element of the team effort needed to prevent bloodborne pathogens exposure incidents. The OSHA BBP standard calls for managers to solicit input from non-managerial employees covered by the standard when identifying, evaluating, and selecting effective engineering and work practice controls. There are clear benefits to having employees buy in on the devices and work practices they must use prior to implementing them.

One benefit is that employees are more familiar with the day-to-day operations and may offer valuable suggestions on how their tasks can be performed more safely and efficiently. Another benefit is that employees might be more likely to follow the procedures and use devices that they help select. Employee compliance is essential to employee protection.

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* Fiscal years range from 10/1/07-9/30/08 and 10/1/08-5/31/09.



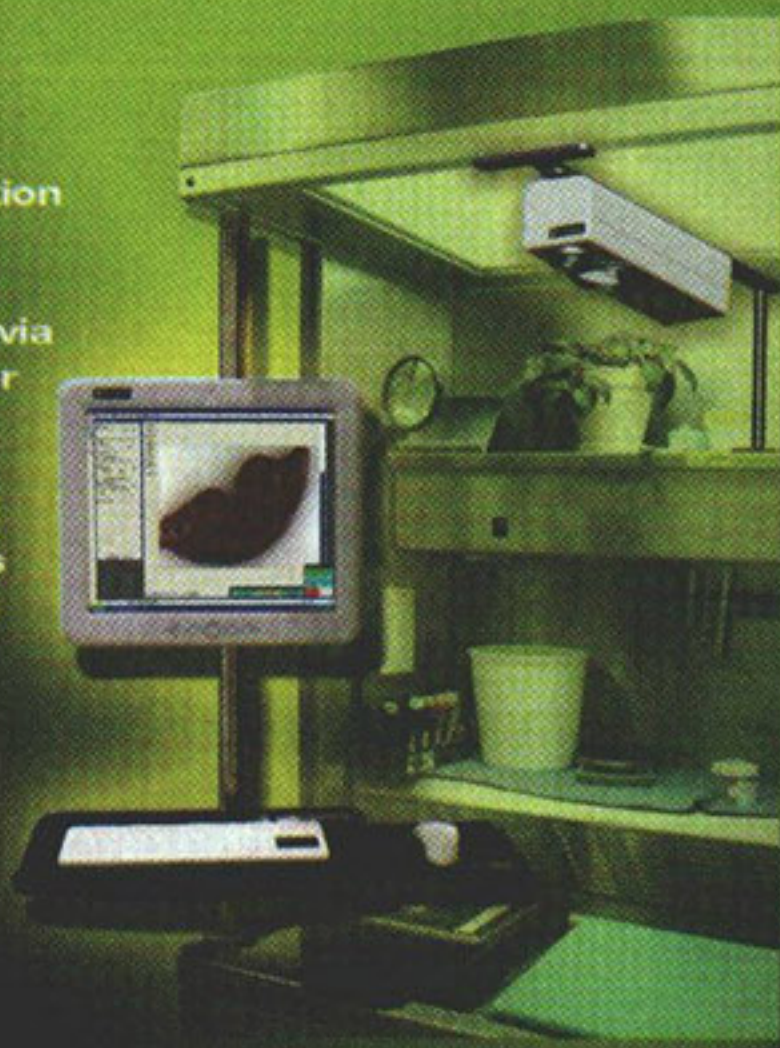
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