Stanford University - Bloodborne Pathogens Local Exposure Control Plan

i. Purpose, Regulatory Driver and Scope

The California Occupational Safety and Health Administration (Cal-OSHA) Bloodborne Pathogens Standard (8 CCR • 5193) requires employers to establish an Exposure Control Plan (ECP), which provides methods and procedures to eliminate or minimize potential exposures of employees to human blood/bloodborne pathogens (BBP), or other potentially infectious materials (OPIM) or blood. Principal Investigators (PIs) and supervisors should refer to the Stanford University Institutional Exposure Control Plan as a resource for exposure control background, issues and regulatory procedures.

Stanford University Local Bloodborne Pathogen Exposure Control Plan:

The Stanford University Bloodborne Pathogens Local Exposure Control Plan supplements the Stanford University Institutional Exposure Control Plan for areas overseen by a PI/Supervisor, who is responsible for the health and safety of their supervised personnel. The Local ECP addresses health and safety issues specific to the materials and procedures being used by research personnel and constitutes a Tier III training for these topics.

PIs/supervisors with employees who may be exposed to human Bloodborne Pathogens (BBPs)/Other Potentially Infectious Materials (OPIM)/Blood must ensure personnel complete a Local ECP. Working with employees, use this document to:

- Guide identification of procedures and materials in the laboratory that have the possibility of exposing personnel to BBPs/OPIM
- Review methods of compliance to ensure a safe work environment
- Determine appropriate engineering and work practice controls
- Review requirements for reporting and documenting sharps injuries
- Ensure participation in the Stanford University Medical Surveillance Program

The Local ECP shall be completed and reviewed by the PI/Supervisor and personnel annually and/or as needed by job changes. The completed Local ECP shall be located in the laboratory (as a hard copy or on computer) for reference and documentation of compliance.

Elements of the Local ECP to be completed by the PI/Supervisor in collaboration with employees include:

1. PI/Supervisor to review ECP fundamentals with employees using the material presented in the Local ECP as a guide.

2. Laboratory Specific Information
   a. Exposure Determination – identification of materials, job categories, tasks and procedures (Appendix A, provided at the end of Local ECP)
   b. Methods of Compliance – training documentation, local ECP completion and reviews (Appendix B, provided at the end of Local ECP)

3. Reporting and Documentation of Injuries
   a. Documentation of use of non-compliant sharps (Appendix C, provided at the end of Local ECP)
   b. Incident reporting of sharps accidents

4. Medical Surveillance Program
   a. Hepatitis B Declaration
   b. Incident reporting of potential exposures