



UCDHSC Administrative Policy Statement

Title: Bloodborne Pathogens Exposure Control & Hepatitis B Vaccination Policy
Source: Department of Environmental Health and Safety
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Director, Dept. of Environmental Health and Safety
Effective Date: June 22, 2007
Replaces: March 2000 (UCHSC); June 1994 (UCHSC)
Applies: All UCDHSC

A. Introduction

Per the [NIH Grants Policy Statement](#) and the [Centers for Medicare and Medicaid Service \(CMS\) regulations](#), the Occupational Safety and Health Administration (OSHA) [Bloodborne Pathogens Standard 29 CFR 1910.1030](#) must be followed when developing and implementing health and safety procedures and practices for both personnel and facilities.

Grantee institutions and those accepting federal CMS reimbursements for patient care are responsible for meeting Federal, State, and local health and safety standards; and for establishing and implementing necessary measures to minimize their employees' risk of injury or illness with respect to potential occupational exposure to bloodborne pathogens (BBP) or other potentially infectious materials (OPIM)

B. Policy Statement

1. It is the intent of the University of Colorado at Denver and Health Sciences Center to assure that the applicable standards, training and exposure control plans have been created and implemented to provide for the effective and efficient administration of the OSHA Bloodborne Pathogens Standard.
2. The Department of Environmental Health and Safety, under the auspices of the Office of the Assistant Vice Chancellor for Regulatory Compliance, will create and implement the appropriate training and an overall Bloodborne Pathogens Exposure Control Plan for Downtown Denver and Health Sciences Center work units.
3. All Downtown Denver and Health Sciences Center units (schools, departments, centers, etc) will comply with this policy and the University [Exposure Control Plan](#).

4. All personnel with potential occupational exposure to human blood, bodily fluids, tissues and organs, and other potentially infectious materials will comply with the training and exposure control plans for the University.

5. Hepatitis B is a vaccine-preventable bloodborne pathogen, transmissible by contact with infected human blood, bodily fluids, and tissues. All personnel with potential occupational exposure to human blood, bodily fluids, tissues and organs, and other potentially infectious materials will be offered the appropriate Hepatitis B immunizations, at no cost to the employee. Departmental F&A funds, clinical and general operating funds have been determined to be acceptable sources for funding employee immunizations.

C. Procedures

1. All UCDHSC units (schools, departments, centers, etc) will assess the potential for exposure for each employee and student under their administrative control. The UCDHSC [Exposure Control Manual](#) provides further guidance on the exposure analysis and documentation. Questions may be addressed to the [Biosafety Officer](#), Dept. of Environmental Health & Safety.

2. All employee job description/classification documents (PDQs, etc) will be reviewed to determine if there is a potential occupational exposure to BBP and to determine the tasks and procedures which create the occupational exposure. Those positions having potential occupational exposure will be reflected in the PeopleSoft HRMS.

3. Each UCDHSC unit shall offer all employees having potential occupational exposure the Hepatitis B immunizations at no cost to the employee(s). Any employee who chooses to decline the Hepatitis B immunizations will complete a "[Letter of Declination](#)" available on the University web or from the Biosafety Office. A copy of that signed letter must be kept in the employee occupational health files.

4. Each UCDHSC academic unit should establish policies to assure the pre-matriculation immunization status of all students with potential exposures prior to their enrollment. Appropriate guidelines are available from the [American College Health Association](#) or from the [U. S. Centers for Disease Control and Prevention, Advisory Committee on Immunization Practices](#). Each UCDHSC program in the health professions (to include the Schools of Medicine, Dentistry, Nursing and Pharmacy and Graduate Medical Education) will be responsible for establishing criteria for pre-matriculation immunization against Hepatitis B for their student populations in training for health care professions.

5. All employees and students with potential exposure will participate in the mandatory initial and annual refresher training offered by the UCDHSC Department of Environmental Health and Safety, or its equivalent.