

Managing the Regulatory Environment

ADA's Guidelines for Practice Success™ (GPS™)

ADA Tip Sheet on Exposure Control Plans

Your dental practice's exposure control plan should be a written program that outlines the protective measures taken in your practice to eliminate or minimize employee exposure to blood and other potentially infectious materials (OPIM). This Tip Sheet, developed by the American Dental Association (ADA), is sourced from the Occupational Safety and Health Administration's (OSHA) [Most Frequently Asked Questions Concerning the Bloodborne Pathogens Standard](#). Practices are advised to consult that resource for complete information on this topic.

Another helpful resource is the [ADA Sample Exposure Control Checklist](#), provided courtesy of the [ADA Practical Guide to OSHA Compliance Manual](#). That resource appears in the Occupational Safety and Health Administration (OSHA) section of this module.

Make sure:

- Your written exposure control plan includes all required documentation and meets these minimum requirements:
 - ✓ identifies job classifications with occupational exposure
 - ✓ identifies tasks and procedures where occupational exposure is possible
 - ✓ details the procedures for evaluating the circumstances surrounding exposure incidents
 - ✓ outlines a schedule of how other provisions of the standard are implemented, including:
 - methods of compliance such as
 - universal precautions
 - engineering and work practice controls, e.g., safer medical devices, sharps disposal containers, hand hygiene
 - personal protective equipment (PPE)
 - CDC's [Q&A on PPE](#) provides easy to access information regarding the purpose of PPE, when to wear surgical masks, protective eyewear, protective clothing and/or gloves and more.
 - housekeeping practices, including decontamination procedures and removal of regulated waste
 - Hepatitis B vaccinations and post-exposure evaluations and follow-ups
 - communication of hazards to employees
 - recordkeeping
- To review the exposure control plan annually or any time there are changes in tasks, procedures, or employee positions that may impact, or create, new opportunities for occupational exposure.
- The plan is accessible to employees and representatives of OSHA and the National Institute for Occupational Safety and Health (NIOSH) upon request.
- Any evaluation of an exposure incident should document at least the following:
 - ✓ the route(s) of exposure
 - ✓ the circumstances under which the exposure incident occurred
 - sufficient detail about the incident, such as:
 - engineering controls in use at the time and work practices followed
 - descriptions of any devices and/or protective equipment used
 - descriptions of any protective clothing worn
 - where the incident occurred
 - what was being done when the incident occurred

- the employee's training history
 - the source individual, unless the employer can establish that identification is infeasible or prohibited by state or local law
- ✓ An evaluation of policies at the time of the exposure incident and an evaluation of how the accident occurred to determine whether corrective action is needed to prevent similar occurrences in the future
- Employees are aware of the proper reporting procedures so all first-aid incidents involving the presence of blood or OPIM are reported to the employer immediately with documentation being submitted before the end of the work shift during which the incident occurs. Those reports must include:
 - ✓ a description of the circumstances of the accident, including the date and time
 - ✓ a determination of whether an exposure incident, as defined in the standard, occurred
 - ✓ the names of all first-aid providers who rendered assistance
 - ✓ documentation confirming that first-aid providers received training under the Bloodborne Pathogens standard that's relevant to the situation
 - ✓ confirmation that any first-aid providers who provided assistance in a situation involving the presence of blood or OPIM were offered a vaccine as soon as possible and no later than 24 hours after the exposure incident
 - If an exposure incident as defined in the standard has taken place, other post-exposure follow-up procedures must be initiated immediately, as per the requirements of the standard
 - ✓ access to a report that lists all first-aid incidents for review by any employees or OSHA upon request

Resources:

OSHA's [Most Frequently Asked Questions Concerning the Bloodborne Pathogens Standard](#)
 ADA [Sample Exposure Control Checklist](#)
 ADA [Practical Guide to OSHA Compliance Manual](#)
 CDC's [Q&A on PPE](#)

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