

Managing the Regulatory Environment

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

ADA Checklist for OSHA's Bloodborne Pathogens Standard

Dental practices must comply with the Occupational Health and Safety Administration's (OSHA) Bloodborne Pathogens Standard and all regulations regarding infection control. An exposure control checklist can make compliance easier and may reduce the likelihood of any incident that might put an employee at risk for injury or illness. Take a look at the [OSHA Fact Sheet on OSHA's Bloodborne Pathogens Standard](#) for basic information about what the Standard requires.

The following checklist is designed to help you complying with the OSHA standard; it has not been approved or endorsed by the agency and completion of all of the activities detailed here cannot guarantee compliance with all OSHA requirements. Its primary purpose is to serve as a resource for assessing your progress in complying with the relevant regulations.

- Read the OSHA Standard
 - ✓ Make sure you understand all of the standard's provisions.
 - ✓ Be aware of your responsibilities and obligations as an employer.
- Develop a written exposure control plan based on the Standards' requirements.
 - ✓ The American Dental Association (ADA) offers a variety of helpful resources including:
 - [The ADA Practical Guide to Effective Infection Control](#)
 - [The ADA Practical Guide to OSHA Training: Compliance for Dental Professionals](#)
 - [The ADA Practical Guide to OSHA Compliance Manual and CD-ROM with Update Service](#)
 - ✓ The plan should specify the schedule and method of implementation for each of the requirements of the Bloodborne Pathogens Standard.
 - Review and update the exposure control plan annually and as necessary to ensure that it takes into account any significant changes in tasks or procedures.
 - Make sure that this exposure control plan is available for review by employees.
- Perform the exposure determination.
 - ✓ Conduct that analysis without regard to the use of personal protective equipment.
 - ✓ Identify and document positions in which all employees have occupational exposure.
 - ✓ Identify and document positions in which some employees have occupational exposure.
 - Identify the tasks and procedures for employees in positions in which only some of the employees have the potential for exposure.
- Make sure the exposure control program includes each of the activities detailed below:
 - ✓ Standard precautions
 - ✓ Engineering and work practice controls, including annual consideration of safer needle devices, using employee input
 - ✓ Handwashing
 - ✓ Personal protective equipment
 - ✓ Housekeeping procedures
 - ✓ Cleaning and methods of decontamination
 - ✓ Regulated waste containment in the office
 - ✓ Laundry procedures for personal protective equipment
 - ✓ HBV vaccination of all employees at risk
 - ✓ Post-exposure evaluation and follow-up
 - ✓ Labeling procedures
 - ✓ Information and training

- Institute a staff training and education program
- ✓ Provide all employees with the potential for occupational exposure interactive training and education that includes information on:
 - the Standard
 - the practice's exposure control plan
 - the epidemiology, modes of transmission, and symptoms of HIV, HBV and HCV and ways to prevent transmission
 - the location and proper use of personal protective equipment
 - engineering controls, proper work practices and standard precautions
 - the meaning of color-codes, the biohazard symbol, and precautions to use when handling contaminated articles or infectious waste
 - procedures to be followed if a needle stick or other exposure incident occurs
- ✓ Training should be conducted annually.
- Maintain the appropriate records.
 - ✓ Establish training records for each employee and document the dates of all training sessions and the contents of each training program.
 - ✓ Establish a medical record for each employee and include pertinent information regarding HBV vaccination and post exposure evaluation and follow-up.
 - If applicable, have any clinical employee who refuses the HBV vaccine complete a Hepatitis B vaccine declination form.
 - Document any exposure incident in the employee's medical record.
 - ✓ Document your annual efforts to consider safer needle devices and to include employee input.

Resources: [OSHA Fact Sheet on OSHA's Bloodborne Pathogens Standard](#)
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