A. Purpose
Where potential “occupational exposure” exists, the OSHA Bloodborne Pathogen (BBP) Standard requires that employers prepare and maintain a Bloodborne Pathogens Exposure Control Plan (ECP) (http://ehs.columbia.edu/ExposureControlPlan.pdf). The purpose of this policy is to establish Columbia University’s position that occupational exposure to bloodborne pathogens shall be minimized in accordance with the ECP. This document outlines the applicability of and responsibilities under the ECP, and refers to the ECP’s contents related to protective measures designed to eliminate or minimize employee exposure to blood and other potentially infectious material (OPIM) to reduce the risk of infection. Such measures include, but are not limited to, engineering and work practice controls, personal protective equipment, Hepatitis B virus (HBV) vaccination, annual training, housekeeping and disinfection procedures, medical evaluations, hazard communication, and recordkeeping.

B. Applicability/scope
The OSHA BBP Standard 29 CFR 1910.1030 applies to all occupational exposures to blood or other potentially infectious materials. Columbia employees who work with bloodborne pathogens are subject to the Standard’s requirements. The ECP is one component of the Columbia University Bloodborne Pathogen Program (“the Program”). The program has been developed to ensure protection from the risk of exposure to bloodborne pathogens, such as the Human Immunodeficiency Virus (HIV) and the Hepatitis B Virus. Another component of the program is the Columbia University Bloodborne Pathogens Exposure Control Policy (“the Policy”) which has been developed to be in agreement with the regulations set forth in the OSHA Bloodborne Pathogens Standard. Whereas the Standard is applicable to University employees, the Policy is applicable to all employees, students and researchers who could be "reasonably anticipated", as the result of performing their job duties, to come in contact with blood and OPIM.

C. Responsibilities
Columbia University (employer):
   o Having an employee(s) with occupational exposure, as defined by the Standard, shall establish a written ECP designed to eliminate or minimize employee exposure.

Environmental Health and Safety (EH&S)
   o Develops and implements the Columbia University Blood Borne Pathogens Program.
   o Develops written Blood Borne Pathogens policy and amend as necessary.
   o Responsible for updates of the ECP and providing laboratories with the most recent copy through electronic distribution.
   o Performs risk assessments. Identifies, in conjunction with employee supervisors, those employees, students, and researchers, who as the result of performing their job duties could be “reasonably anticipated” to come in contact with blood and other potentially infectious materials (OPIM).
   o Provides Bloodborne Pathogens Awareness training, documents attendance
   o Recommends personal protective equipment (PPE) if necessary.
   o Assists in locating suppliers of “safe needles” and other products that may reduce exposure.
   o Conducts investigations of exposure incidents and recommend work practice changes, if necessary.
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- Conducts inspections to ensure implementation of the ECP and compliance with the Standard.
- Responsible for all biological safety program information, and addressing ad hoc biological safety issues.

Department Heads/Employee Supervisors/Principal Investigators (PIs)
- Identify those employees who, as the result of performing their job duties, may be "reasonably anticipated" to come in contact with blood and other potentially infectious materials.
- Ensure employees have received Bloodborne Pathogens training.
- Ensure that task- and laboratory-specific training is provided to laboratory personnel in addition to the training provided by EH&S.
- Ensure an adequate supply of PPE is available.

D. Definitions
- Occupational Safety and Health Administration (OSHA) – United States federal agency responsible for employee safety
- Exposure Control Plan (ECP) – A written plan to eliminate or minimize occupational exposure to bloodborne pathogens
- Bloodborne Pathogens (BBP) are pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV) and human immunodeficiency virus (HIV).

E. Procedures
- Refer to BBP-ECP.

F. Emergency contacts
- Refer to BBP-ECP.

G. Medical Surveillance
- Refer to BBP-ECP.

H. Recordkeeping
- Columbia University Environmental Health & Safety (EH&S) will review the ECP and update it on an annual basis, unless changes in the workplace occur. In that case, the Plan will be assessed and updated immediately to accommodate workplace changes. Copies of the ECP will be available on the EH&S website (http://ehs.columbia.edu/ExposureControlPlan.pdf) to all employees. This ECP is also maintained as a hard copy by EH&S to ensure access to officials from other regulatory bodies with jurisdiction over compliance.

I. Appendices
- Bloodborne Pathogens Exposure Control Plan – Full text

J. Forms
- None

K. References
- OSHA Clinicians web page http://www.osha.gov/dts/oom/clinicians/index.html