



Responsible Department: Environmental Health and Safety

Recommended By: Senior Vice Chancellor for Business and Financial Affairs, Director of Environmental Risk Management, Associate Vice Chancellor for Facilities Management & Planning

Approved By: Chancellor

Policy Number
EHS 16.10.020

Effective Date
05/31/2022

I. INTRODUCTION

- A. The University is committed to providing a safe and healthy work environment for students, staff, faculty, and visitors.
- B. Bloodborne pathogens are pathogenic microorganisms that are present in human blood and can cause disease in humans. The pathogens include, but are not limited to: Hepatitis Viruses and Human Immunodeficiency Virus (HIV).
- C. The standards and guidelines set forth in Title 29 Code of Federal Regulations, Part 1910.1030, Occupational Exposure to Bloodborne Pathogens; Needlesticks and Other Sharps Injuries; Final Rule, and the Needlestick Safety and Prevention Act, HR 5178 apply to work performed on University Premises, as well as work being performed by University employees off-campus.

II. POLICY OVERVIEW

- A. The Department of Environmental Health & Safety (EHS) will establish a Bloodborne Pathogen Exposure Control Plan (ECP) and make it available to all employees on the EHS [website](#).
- B. The ECP will identify minimum guidelines and procedures at the University for the appropriate training, methods, and processes to eliminate or minimize occupational exposures to bloodborne pathogens (BBP) and other potentially infectious materials (OPIM), in accordance with the OSHA Bloodborne Pathogens Standard, 29 CFR 1930.1030.
- C. The ECP applies to all personnel and activities at the University, and specifically to all tasks, activities, jobs, or positions that have a potential for exposure to bloodborne pathogens and the employees who perform those tasks and activities or occupy those jobs and positions. The ECP does not apply to the University

Health Counseling Center (UHCC), which has a UHCC-specific ECP.

III. PROCESS OVERVIEW

- A. EHS is responsible for the implementation of the ECP in collaboration with departmental management from all affected departments.
- B. Bloodborne Pathogens training is required annually for all faculty, staff, and students who work with bloodborne pathogens or human source material in a laboratory or clinical setting. Training will address bloodborne diseases, risk assessment, recommended work practices, engineering controls and personal protection as well as an update of waste disposal and emergency procedures.
- C. Each responsible department head, manager, and/or supervisor, in collaboration with EHS, will maintain and provide all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard and will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.
- D. It is the responsibility of each employee who is determined to have occupational exposure to blood or other potentially infectious materials (OPIM) to comply with the procedures and work practices outlined in the ECP.
- E. EHS is responsible for reviewing and updating the ECP annually to reflect any new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

IV. DEFINITIONS

- A. **“Bloodborne Pathogens”** means microorganisms present in blood that can cause human disease; including, but not limited to HBV, HCV and HIV.
- B. **“Hepatitis B Virus (HBV)”** means the virus that causes Hepatitis B disease in humans.
- C. **“Hepatitis C Virus (HCV)”** means the virus that causes Hepatitis C disease in humans.
- D. **“Human Immunodeficiency Virus (HIV)”** means the virus that causes Acquired Immunodeficiency Syndrome (AIDS) in humans.
- E. **“Occupational Exposure”** means actual or reasonably anticipated skin, eye, mouth, mucous membrane or parenteral contact with blood or other potentially infectious material as a result of performance of employee's duties.

F. "Other Potentially Infectious Materials (OPIM)" means:

1. Human body fluids: blood, semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pericardial fluid, pleural fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids.
2. Any unfixed tissue or organ (other than intact skin) from a human (living or dead).
3. HIV or HBV-containing cell or tissue cultures, organ cultures, and HIV or HBV-containing culture medium or other solutions; and blood, organs, or other tissues from experimental animals infected with HIV or HBV. (Bloodborne pathogens as they relate to the use of animal blood may also be covered by the policies of the University's research animal care facilities).

G. "University Premises" includes, but is not limited to, all indoor and outdoor common and educational areas, all University owned, leased, or operated facilities, University owned or operated housing (including but not limited to University property leased to University-recognized fraternities and sororities), campus sidewalks, campus parking lots, recreational areas, outdoor stadiums, and University owned or leased vehicles (regardless of location). University Premises does not include municipal property that goes through or is adjacent to campus, such as sidewalks or alleys.

V. RESOURCES

- A. [University of Denver Exposure Control Plan](#).
- B. Section 1910.1030 of Title 29 of the Code of Federal Regulations: Occupational Exposure to Bloodborne Pathogens.
- B. Needlestick Safety and Prevention Act, HR 5178.
- C. OSHA instruction CPL 2-2.44C: Enforcement Procedures for the Occupational Exposure to Bloodborne Pathogens Standard, 29 CFR 1910.1030.

Revision Effective Date	Purpose