

September, 2019

## **Bloodborne Pathogens and First Aid Responders**

Because injuries happen at work, OSHA requires employers to make first aid and medical services available to their employees." The primary requirement addressed by these standards is that an employer must ensure prompt first aid treatment for injured employees, either by providing for the availability of a trained first aid provider at the worksite, or by ensuring that emergency treatment services are within near proximity of the worksite. The basic purpose of these standards is to assure that adequate first aid is available in the critical minutes between the occurrence of an injury and the availability of physician or hospital care for the injured employee.

### **What is Near Proximity?**

OSHA takes the position that "near proximity" in cases of serious hazards and injuries — such as falls, suffocation, electrocution, or amputation, and stopped breathing, cardiac arrest, or uncontrolled breathing — means a 4 minute response time of a trained emergency service provider, such as fire department paramedics or EMS responders or reasonable proximity (4 minutes) of an infirmary, clinic or hospital. For employers in lower-hazard settings, such as offices, OSHA has stated that up to a 15 minute response time could be acceptable.

### **What if My Location is not in Near Proximity?**

For employers who have determined that they are not in near proximity, you are required to have at least one trained employee per shift and work assignment who has been trained by a recognized authority in first aid and CPR.

The Bloodborne Pathogens Standard applies to employees who have been designated and trained to perform first aid. Its purpose is to minimize or eliminate occupational exposure to bloodborne pathogens by means of engineering controls, personal protective equipment, training, medical surveillance, and vaccination.

To which employees does this Rule apply?

This standard impacts employees who are specifically designated as responsible for rendering first aid or medical assistance as part of their job duties. Note: employees who perform "Good Samaritan" acts are not covered by this standard, although it is customary to offer follow-up procedures to an employee who experiences an exposure incident as the result of performing a "Good Samaritan" act. The key to this issue is not whether employees have been trained in first aid, but whether they are also designated as responsible for rendering medical assistance.

While housekeeping staff in non-health care facilities is not generally considered to have occupational exposure, it is the employer's responsibility to determine which job classifications or specific tasks and procedures involve occupational exposure keeping in mind the definition.

### **What is required of the employer?**

- Identify positions, classifications, work assignments and tasks that are subject to occupational exposure
- Annually train identified employees according to 1910.1030(g)(2)(vii)
- Offer identified employees the hepatitis B vaccine and vaccination series.
- If employees decline the offer of vaccination, require them to sign the hepatitis B vaccine declination statement in Appendix A.\*
- If a covered employee declines because they already received the vaccination, include medical documentation of the vaccination in the employee's medical file

\*Note: an employee could initially decline the vaccination, but later change his or her mind and request it. If the employee's duties still involve occupational exposure, the employer must make the vaccination available.

### **Record Keeping**

In addition to the records mentioned above, establish and maintain a secure and confidential record of the following:

- A copy of the employee's hepatitis B vaccination status, vaccine administration dates and any related medical records
- A copy of training records
- A copy of all results of examinations, medical testing and follow-up procedures
- The employer's version of the health care professional's written opinion
- A copy of documents provided to the health care professional after the employee was exposed