REGULATION CHECKLIST FOR MEDICAL AND DENTAL CLINICS

I. Bloodborne Pathogens (1910.1030) - Overview

___ 1. Written Exposure Control Plan Describing:
   a. Who has “occupational exposure”
   b. Clinic’s methods of compliance
      i. Universal Precautions policy for clinic
      ii. Engineering and work practice controls for worksite
      iii. Personal protective equipment, manner of use
      iv. Medical provisions - HBV vaccinations and post-exposure evaluation/follow-up
      v. Communication of hazards - training and labeling
      vi. Recordkeeping
   c. Annually updated and available to employee.
   d. Documented annually consideration of commercially available devices
   e. Name of non-management employees who have direct patient care and their solicited comments.

___ 2. Engineering Controls and Safe Work Practices
   a. Engineering - example: Sharps containers, cleaning devices, self-sheathing needles, etc.
   b. Work Practice - OSHA required and site/practice-specific
   c. Handwashing policies and facilities, eyewash recommended
   d. Contaminated sharps - Minimal handling, disposable where feasible
   e. Food/drink/cosmetics - Prohibited where any exposure may occur
   f. Specimens securely containerized
   g. Serviceable equipment - Decontaminate or label as Biohazard

___ 3. Personal Protective Equipment (PPE)
   a. Gloves, gowns, aprons, goggles, shields, masks, head/foot covers
   b. Employer laundering, disposal — remove before leaving work
   c. Decontaminate utility gloving

___ 4. Housekeeping Practices
   a. Written schedule - Describe decontamination areas, process
   b. Appropriate disinfectants for contaminated surfaces
   c. Protective coverings
   d. Broken glass cleanup procedures
   e. Procedures for reusable sharps

___ 5. Regulated Waste and Contaminated Laundry
   a. Approved containers for sharps and other regulated waste
   b. Disposal in accordance with local, state regulations
   c. Laundry procedures - PPE, containerization, minimal handling
   a. HBV vaccinations within 10 days after assignment to duties involving
      occupational exposure to blood or OPIM
   b. Post-exposure follow-up
      i. Evaluation of exposure incidents
      ii. Determination of serological status of source
      iii. Medical follow up
   c. Confidential medical files - Duration of employment + 30 years

7. Biohazard Communication
   a. Biohazard labeling
   b. Information and training upon initial assignment
   c. Training records - 3 years
   d. Sharps injury log (if applicable)

II. Chemical Hazard Communication (1910.1200) - Overview

1. Written Program describing:
   a. How employer determines which materials are hazardous
   b. In a list form, what hazardous chemicals are in facility
   c. How hazards of non-routine tasks are communicated
   d. Hazards in unlabeled pipes
   e. Information provided to outside contractors
   f. Description of labeling system used
   g. How Material Safety Data Sheets (MSDS) are obtained, maintained
   h. Training program for employees
   i. Hazard Communication Standard

2. Material Safety Data Sheets (MSDS) Required for Hazardous Substances
   a. Exempted are drugs as defined by FDA in pill or tablet form and consumer
      items if use is consistent with normal consumer use

3. Hazard Labeling - Unless already labeled by some other regulatory agency.

4. Employee Training and Information

III. Tuberculosis (TB) - Proposed OSHA Standard (1910.1035)

1. Covered High Risk Employers - Hospitals, nursing homes, correctional centers,
   hospices, homeless shelters, drug abuse centers, labs, workers in high risk
   settings (example: AFB isolation), EMS services, home health or hospice care
2. Limited compliance if no TB cases in past 12 months, no services to suspect or confirmed infectious persons, and low rate of TB in the community (as described in proposed standard)

2. Covered employers must have:
   a. Exposure Control Plan
   b. Work Practice and Engineering Controls
   c. Respiratory Protection (see also 1910.139)
   d. Medical Surveillance
   e. Hazard Communication and Training
   f. Recordkeeping

IV.  ____ Personal Protective Equipment (1910.132 to .138) - Certified written assessment of workplace hazards which require PPE, including training

V.  ____ Comprehensive Chemical Standards - Formaldehyde, Ethylene Oxide, Asbestos (example: building materials), etc.

VI.  ____ Laboratory Standard (1910.1450)

VII.  ____ Air Contaminants (1910.1000) - Mercury, nitrous oxide, gluteraldehyde, etc.

VIII.  ____ Radiation Safety (1910.1096) - Monitoring exposed workers (x-ray), compliance with state requirements

IX.  ____ Employee Access to Medical Records (1910.1020)

X  ____ Emergency Action Plan (1910.38)

XI.  ____ Emergency Exit Signs (1910.37)

XII.  ____ Emergency Lighting

XIII.  ____ Electrical Components Properly Grounded (1910.301 to .309)

XIV.  ____ Abrasive Wheel Guarding (1910.215) - Bench Grinders

XV.  ____ Fire Extinguishers and Employee Training (1910.157)

XVI.  ____ OSHA Illness and Injury Log (1904.2) - Eleven or more employees

XVII.  ____ OSHA Poster (1903.2)

XVIII.  ____ General Duty Clause [5(a)(1)]

NOTE : Other regulations may apply, depending on the type of work performed in facility.