

Bloodborne Pathogens Exposure Control Plan

MedSpaBinder

Clinic _____ Plan administrator _____ Effective date _____

Template only. Complete it for your clinic, review it at least yearly, and keep it where every employee can read it.

1. Plan administrator and access

Plan administrator (name, title) _____ Phone / email _____

Where the plan is kept _____ Employees can get a copy from _____

2a. Exposure determination: job titles where ALL employees have occupational exposure

Job title	Department / location

2b. Job titles where SOME employees have exposure, and the tasks that cause it

Job title	Tasks and procedures with possible exposure

Exposure is decided as if no protective equipment were worn (OSHA requires this). Common exposures in a med spa: injections, microneedling, PRP, IV therapy, laser and other procedures that can draw blood, handling sharps, and cleaning contaminated equipment.

3. Methods of compliance: how we control exposure here

Control	What we do, where, and who is responsible
Universal precautions	
Handwashing facilities	
Sharps containers (where, when replaced)	
Safer sharps devices in use	
Work practices (no recapping, no food in work areas)	
Personal protective equipment provided	
Cleaning and disinfection schedule	
Regulated waste (company, pickup)	
Contaminated laundry	
Labels and biohazard signs	

Bloodborne Pathogens Exposure Control Plan (continued)

4. Hepatitis B vaccination

The hepatitis B vaccine is offered at no cost to every employee with occupational exposure, after bloodborne pathogens training and within 10 working days of starting the job. Employees who decline sign the OSHA declination statement (Appendix A). An employee who declines can accept later, still at no cost.

Vaccine provided by (clinic or provider)

Phone

5. Post-exposure evaluation and follow-up

After a needlestick, cut, or splash to the eyes, nose, mouth or broken skin: wash the area right away, report it immediately to the person named below, and go for a confidential medical evaluation, which the employer provides at no cost.

The employer documents the route and circumstances of the exposure, identifies and (with consent, where the law allows) tests the source individual, and gives the evaluating healthcare professional a copy of the standard, the employee's duties, the exposure details, source test results and the employee's vaccination records. The employee gets a copy of the healthcare professional's written opinion within 15 days of the evaluation.

Report exposures to (name, phone)

Post-exposure provider (name, address, phone)

After hours

6. Reviewing each exposure incident: we look at

☐ Engineering controls in use at the time

☐ Device in use (type and brand)

☐ Location and procedure

☐ Work practices followed

☐ Protective equipment worn

☐ Training of the employee

7. Training and communication of hazards

Trainer (name and qualifications)

Training method (in person, video + Q&A)

Initial training: before first exposure

Refresher: at least every 12 months

8. Recordkeeping

Medical records (vaccination status, exposure evaluations, written opinions) are kept confidential and for the length of employment plus 30 years. Training records (dates, content summary, trainer's name and qualifications, attendees' names and job titles) are kept for 3 years. Employers required to keep OSHA injury and illness records also keep a sharps injury log.

9. Annual review, including safer devices and input from front-line staff

Review date	Reviewed by	Safer devices considered	Employees consulted (non-managerial)	Changes made

Approved by: _____ Title: _____ Date: _____