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OSHA Most Frequently Cites ASCs for Bloodborne Pathogen Violations
Updated Exposure Control Plans, Better Documentation and Safety Training Can Boost Compliance

Denver, Colo. November 1, 2011 – Although more than half of the surgeries in the U.S. are performed in ambulatory care centers, ambulatory surgery center (ASC) resources and safety oversight may lag significantly behind those of their hospital counterparts. In the past four years, the Occupational Safety and Health Administration (OSHA) has increased medical facility inspections. As a result, agents are citing more ASCs and physician offices for Bloodborne Pathogen Standard violations. In fact, such violations make up the majority of OSHA medical facility citations in recent years.

According to a two-part series of articles published in October and November editions of the *AORN Journal*, the most frequent causes of bloodborne pathogen violations were outdated or nonexistent exposure control plans, poor documentation, the failure to use safety devices and the lack of free training during working hours. The violations that merited the largest fines dealt with failure to immediately remove personal protective equipment (PPE) penetrated with body fluids; failure to use safety devices; and the failure to provide workers with a free Hepatitis B vaccination and follow up.

“Compliance with the Bloodborne Pathogen Standard may seem complex; however, it is the key to providing a safe workplace for both the health care employee and patient,” writes Pamela Dembski Hart, BS, MT(ASCP), CHSP, principal of Healthcare Accreditation Resources of Boston, in the two-part series, “*Complying With the Bloodborne Pathogen Standard: Protecting Health Care Workers and Patients*,” and “*Compliance: the Key to Bloodborne Pathogen Safety*.”

OSHA adopted the mandatory Bloodborne Pathogen Standard approximately 20 years ago in order to protect health care workers from exposure to blood, body fluids and infectious material. These infectious liquids and materials may contain bloodborne pathogens, particularly Hepatitis C Virus (HCV), Hepatitis B Virus (HBV) and HIV. While protecting workers from disease, safe practices also guard against patient violations. In fact, in the last decade, more than 130,000 U.S. patients served at ASCs were notified of potential exposure to HBV, HCV and HIV due to unsafe injection practices and lapses in infection control.

Hart describes how health care facilities can avoid frequent and costly OSHA violations. Facilities should develop and exposure control plans that determine safety risks and describe-work practice controls. Facility managers should also solicit input from all employees to prevent needle sticks and sharps contamination and identify employees' exposure risks. Issues related to mandatory vaccinations are also discussed.

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The *AORN Journal* is peer reviewed and provides registered nurses in the operating room and related services with information based on scientific evidence and principle. Articles cover the nurse's roles before, during, and after surgery and include patient teaching and preparation, use and care of surgical instruments and supplies, asepsis, sterilization, anesthesia, and related topics.

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