



Dedicated to the health and safety of healthcare workers

August 12, 2010

OSHA Docket Office
Docket No. OSHA-2007-0080
U.S. Department of Labor
Room N-2625
200 Constitution Avenue
Washington, DC 20210

To Whom It May Concern:

The Association of Occupational Health Professionals in Healthcare (AOHP) appreciates the opportunity to submit comments on the Regulatory Flexibility Act Review of the Bloodborne Pathogen Standard.

- AOHP supports the continued existence of the rule. The standard's requirement for Hepatitis B vaccine was especially important for small business with employees at risk of occupational exposure to Hepatitis B. Today, it is rare to find a healthcare worker at risk of exposure to Hepatitis B that has not been vaccinated.
- OSHA has identified a number of non-hospital settings where employees may be at risk of occupational exposure to blood/body fluids. Some additional settings include child care centers, schools, prisons, linen/laundry services and first responders in industrial settings. Other non-traditional settings include plumbers, sewer/sanitation workers, garbage collectors, housekeepers in hotels and non-skilled home care/home maker workers. There have been instances of private physician offices contacting hospital-based occupational health services requesting information on post-exposure follow-up, Hepatitis B vaccination information, sample policies and forms. Perhaps educational materials could be developed for the small business and/or non-healthcare sector that would address some of these questions.
- Recent technological advances have decreased sharps injuries. However, sharps injuries occur even with safety devices. A common reason for injuries with safety devices is failure to activate the safety mechanism. Manufacturers need to continue to develop products that do not require the individual to activate the safety feature and have these products be as cost effective as older devices.
- Needlestick prevention programs have been effective in raising awareness of the hazard of significant exposures. Even with the requirement for safer sharp devices sharps injuries continue across the country. In addition to failure to activate safety features, co-workers contribute to needlesticks/sharp injuries by improper disposal of used sharps. Orientation of new staff to the types of safety devices that are available and how they work is essential in the reduction of sharps injuries. Post injury investigation is also important in the future prevention of injuries.
- AOHP is not aware of any new, emerging health risks for bloodborne pathogens.
- Consideration should be given to changing the annual review of exposure control plan to every other year. This change would allow employers to devote more time to prevention and education strategies rather than revising a plan that may have minimal changes on an annual basis.

AOHP is a national organization with approximately 1000 occupational health professionals who work in healthcare settings, primarily hospitals. AOHP's vision is to be the defining resource and leading advocate for occupational health and safety in healthcare. Our mission is dedicated to promoting the health and safety of workers in healthcare. This is accomplished through:

- Advocating for employee health and safety
- Occupational health education and networking opportunities
- Health and safety advancement through best practice and research
- Partnering with employers, regulatory agencies and related associations.

Again, thank you for the opportunity to provide comments on this document. Please contact MaryAnn Gruden, our Association Community Liaison, if additional information or questions arise. She can be reached at 412/578-6792 or by email at magaohp@yahoo.com.

Sincerely,

Sandra Domeracki, RN, FNP, COHN-S
AOHP Executive President