

## STANDARD ADMINISTRATIVE PROCEDURE

### 34.01.01.M0.01 Bloodborne Pathogens Exposure Control

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#### Procedure Statement

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Texas A&M University is committed to providing a safe and healthy work and educational environment. In accordance with the Texas Health and Safety Code, Chapter 81, Subchapter H, and analogous to the OSHA Bloodborne Pathogens Standard, Texas A&M University and Texas A&M University at Galveston have each implemented a written Exposure Control Plan (ECP) that outlines procedures, engineering controls, personal protective equipment, work practices, and other methods to prevent, or minimize, the exposure of employees, students and others to bloodborne pathogens.

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#### Reason for SAP

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This SAP outlines the responsibilities of the Office of Biosafety, the Office of Health Compliance and Risk Management, the Office of Human Resources and Organizational Effectiveness, and Texas A&M Environmental Health and Safety (EHS), including Texas A&M Galveston EHS, to ensure compliance with the Exposure Control Plan. It also details the roles of employing departments, supervisors, and individuals in adhering to safety protocols, completing required training, and reporting exposure incidents.

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#### Definitions

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Bloodborne Pathogens: is defined in Texas Administrative Code, Title 25, Section 96.101(2). It includes pathogenic microorganisms found in human blood, and that can cause diseases in humans, including the hepatitis B virus, hepatitis C virus, and human immunodeficiency virus.

Bloodborne Pathogens Exposure Control Plan: Document that outlines procedures, engineering controls, personal protective equipment, work practices, and other methods to prevent, or minimize, the exposure of Texas A&M employees, students, and others to bloodborne pathogens. Texas A&M Galveston is responsible for and maintains its own Bloodborne Pathogens Exposure Control Plan for its employees, students, and visitors.

Clinical Personnel: Individuals whose responsibilities include providing direct patient care. These

individuals typically work in clinical settings such as hospitals, health clinics, dental offices. This group includes, but is not limited to, physicians, nurses, dentists, support staff, and students pursuing clinical degrees.

Contaminated Sharps Injury: is defined in Texas Administrative Code, Title 25, Section 96.101(5), as any injury caused by a sharp used or encountered in a health care setting that is contaminated with human blood or body fluids.

Exposure Incident: is defined in Texas Administrative Code, Title 25, Section 96.101(10) as eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious materials that results from the performance of an employee's duties.

Other Potentially Infectious Materials (OPIM): are defined in Texas Administrative Code, Title 25, Section 96.101(18). It includes

- 1) Human fluids such as:
  - Semen
  - Vaginal secretions
  - Menstrual blood
  - Vomit
  - Cerebrospinal fluid
  - Synovial fluid
  - Pleural fluid
  - Pericardial fluid
  - Peritoneal fluid
  - Amniotic fluid
  - Saliva in dental procedures
  - Any other body fluid visibly contaminated with blood
  - All body fluids in situations in which it is difficult or impossible to differentiate between body fluids.
- 2) Any unfixed tissue or organ (other than intact skin) derived from humans or non-human primates.
- 3) Cells, tissue cultures, organ cultures, and culture medium or other solutions containing human immunodeficiency virus, hepatitis B virus, or other bloodborne pathogens, as well as blood, organs, or other tissues from experimental animals infected with human immunodeficiency virus, hepatitis B virus or other bloodborne pathogens.

Research Personnel: This category includes individuals involved in conducting or supporting research activities under a Texas A&M University Institutional Biosafety Committee permit. These roles encompass principal investigators, co-investigators, research assistants, laboratory technicians, graduate students, and postdoctoral researchers.

Sharp: is defined in Texas Administrative Code, Title 25, Section 96.101(21), a sharp is an object used or encountered in a healthcare setting that can be reasonably anticipated to penetrate the skin or any other part of the body, and to result in an exposure incident. This includes needles, scalpels, lancets, broken glass, broken capillary tube, exposed ends of dental wire, and dental knives, drills, or burs.

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## Official Procedure/Responsibilities/Process

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### 1. Roles and Responsibilities

#### 1.1 The Office of Biosafety

- 1.1.1 Maintains and updates the Texas A&M Bloodborne Pathogens Exposure Control Plan to ensure ongoing compliance with applicable regulations and best practices.
- 1.1.2 Collaborates with the Offices of Health Compliance and Risk Management, Texas A&M Galveston Environmental Health and Safety, and Office of Human Resources and Organizational Effectiveness to ensure consistent implementation of the Exposure Control Plan by all applicable personnel.
- 1.1.3 Monitors completion of Bloodborne Pathogens training assigned to Research Personnel and other non-clinical employees and students.
- 1.1.4 Maintains records of hepatitis B immunization election for individuals who complete “Bloodborne Pathogens Training – BOHP”

#### 1.2 The Office of Health Compliance and Risk Management

- 1.2.1 Monitors the completion of Bloodborne Pathogens training assigned to Clinical Personnel.
- 1.2.2 Coordinates and assures the management of records indicating that Clinical Personnel have either received the complete hepatitis B vaccination series, have prior immunity, or have medical contraindications that prevent vaccination.
- 1.2.3 Maintains the Texas Department of State Health Services Contaminated Sharps Injury Log as required by state health regulations.

#### 1.3 Texas A&M Galveston Environmental Health and Safety

- 1.3.1 Maintains and updates the Texas A&M University Galveston Bloodborne Pathogens Exposure Control Plan to ensure ongoing compliance with applicable regulations and best practices.
- 1.3.2 Monitors the completion of TAMUS Bloodborne Pathogens training assigned to Texas A&M Galveston Personnel.
- 1.3.3 Maintains records of hepatitis B immunization election for individuals who complete TAMUS Bloodborne Pathogens Training.

#### 1.4 The Office of Human Resources and Organizational Effectiveness

- 1.4.1 Administers Workers’ Compensation claims through the Department of Employee Relations (TAMU & TAMUG). This involves reporting incidents through the Origami Portal, providing necessary information and documents, and ensuring compliance with related policies such as FMLA.
- 1.4.2 Coordinates with the relevant department to review and update Exposure Risk

Training Job Classifications in Workday, as necessary, to ensure individuals are automatically assigned appropriate Bloodborne Pathogens awareness training.

- 1.4.3 In the event of an exposure incident, maintains appropriate records as required and in accordance with the System's records retention schedule.

#### 1.5 Employing Departments/Supervisors

- 1.5.1 Ensure all employees comply with the provisions of the Bloodborne Pathogens Exposure Control Plan to minimize exposure risks.
  - 1.5.2 Ensure adequate resources (e.g., personal protective equipment (PPE), soap, disinfectants, commercially constructed sharps containers, biohazard waste disposal, labeling materials, etc.) are readily available in accordance with the Bloodborne Pathogens Exposure Control Plan.
  - 1.5.3 Ensure that all employees complete annual Bloodborne Pathogens awareness training in accordance with the Bloodborne Pathogens Exposure Control Plan. This requires the supervisor to do the following:
    - Assess the job duties of new positions and new employees to identify the potential for risk of exposure to blood or OPIM.
    - Regularly assess job duties to identify individuals at risk of exposure to blood or OPIM.
    - Assign and ensure completion of annual Bloodborne Pathogens awareness training for designated individuals.
    - Notify the departmental HR Personnel whenever an individual's job duties change, requiring an update to their Exposure Risk Training Job Classification in Workday.
    - Document and report all incidents involving occupational exposure to blood or OPIM in Origami, as required.
  - 1.5.4 Follow up on trends involving exposure to bloodborne pathogens and investigate their underlying causes to identify ways to prevent future incidents.
- #### 1.6 Employees at Risk of Occupational Exposure to Blood or OPIM
- 1.6.1 Complete Bloodborne Pathogens Training within 10 days of training assignment and annually thereafter.
  - 1.6.2 Adhere to universal precautions to prevent exposure to bloodborne pathogens, including:
    - Use appropriate personal protective equipment.
    - Practice good hand hygiene.
    - Conduct thorough cleaning and disinfection of surfaces and equipment.
    - Implement the use of appropriate engineering controls like sharps disposal containers and safety needles.
  - 1.6.3 Report Exposure incidents as required in this SAP and the relevant Bloodborne Pathogens Exposure Control Plans.

## 2. Incident Reporting

2.1 Employees must immediately report any occupational exposure to blood or OPIM to their supervisor and complete the Employers First Report of Injury or Illness Form (DWC-1) via the [Texas A&M Origami System](#).

2.1.1 If a contaminated sharps injury occurs in a healthcare setting, the facility supervisor must complete and submit the Contaminated Sharps Injury Reporting Form to the local health authority within 30 days. This is in addition to the reporting requirements outlined in this SAP and the relevant Bloodborne Exposure Control Plan.

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### Related Statutes, Policies, or Requirements

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[System Policy 34.01, Environment, Safety and Security](#)

[System Regulation 34.01.01, Health and Safety Programs](#)

[OSHA Bloodborne Pathogen Standard](#)

[Texas Health and Safety Code, Chapter 81](#)

[Texas Administrative Code Title 25, Part 1, Chapter 96](#)

[Texas A&M University Bloodborne Pathogen Exposure Control Plan](#)

[Texas A&M University Galveston Bloodborne Pathogen Exposure Control Plan](#)

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### Contact Office

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