

Safety Device Plan

Identifying and Selecting Appropriate and Currently Available Engineering Control Devices

Our policy is to select appropriate and effective engineering controls to prevent or minimize exposure incidents. Engineering controls means controls (e.g., sharps disposal containers, needleless systems and sharps with engineered sharps injury protection) that isolate or remove the bloodborne pathogens hazard from the workplace.

_____ (Director/Manager/Supervisor) first evaluate products that eliminate the use of sharps (e.g., needleless systems), if available. If these devices are not selected, we then evaluate devices equipped with engineered sharps injury protection (ESIP). ESIP means either (1) a physical attribute built into a needle device used for withdrawing body fluids, accessing a vein or artery, or administering medications or other fluids, which effectively reduces the risk of an exposure incident by a mechanism such as barrier creation, blunting, encapsulation, withdrawal, or other effective mechanisms; or (2) a physical attribute built into any other type of needle device or into a non-needle sharp, which effectively reduces the risk of an exposure incident.

_____ (Director/Manager/Supervisor) establish and maintain procedures for identifying and selecting appropriate and effective engineering controls, which may include the following steps:

1. Set up a Process
2. Define Needs
3. Gather Information
4. Test and Select Products
5. Use New Products
6. Conduct Follow-up

_____ (Director/Manager/Supervisor) modify the steps outlined above to fit the requirements as follows:

1. Set up a Process

_____ (Director/Manager/Supervisor) use a systematic process to identify and select appropriate and effective engineering controls. The process may include committees, subcommittees, working groups, a lead person, or other responsible employees. The same groups or individuals are responsible for all the steps in the process of identifying and selecting engineering controls. In our organization the setup is:

_____ (Director/Manager/Supervisor) actively involve managers and employees from departments, units, or floors where engineering controls are (or will be) used.

_____ (Director/Manager/Supervisor) choose individuals with expertise and experience in particular professions or specialties to evaluate new products that will be used in

their area(s) of practice. Individuals involved in our process include: staff, nurse manager, and medical assistant.

2. Define Needs

_____ (Director/Manager/Supervisor/PI) address each potential exposure of the tasks and procedures performed in various departments, units, floors, or dental operatories. We solicit input from frontline employees, supervisors, and managers. We also collect occupational exposure and injury data. We then identify our needs and establish our priorities on the basis of an analysis of all the available information.

Priority Potential Exposures to Be Addressed Work Area

- (1) Needle stick- safe needle use is in place.

3. Gather Information

_____ (Director/Manager/Supervisor/PI) gather information on currently available engineering controls that are designed to reduce occupational exposure to blood or OPIM. Because new technology is continually entering the marketplace, we also periodically search for information on new products.

4. Test and Select Products

Each potential exposure is addressed by applying screening criteria to the engineering controls under consideration. When available, multiple devices are screened for each potential exposure being addressed.

This helps ensure that more than one product is selected for testing for a given task or procedure. Screening criteria are applied to products in order to eliminate those with readily identifiable problems (e.g., ineffective devices, safety issues, visual obstructions). Only devices meeting an acceptable number of screening criteria are then tested in actual patient or product trials. For each exposure being addressed, _____ (Director/Manager/Supervisor/PI) document the new products that meet an acceptable number of screening criteria and will be included in the testing.

Testing Products

Testing can help evaluate whether products are actually effective at reducing or eliminating workplace exposure incidents. Frontline employees who perform the tasks and procedures associated with the exposures being addressed are involved in the testing. If available, multiple products from a single category of devices are tested for each potential exposure being addressed. The testing of new products is suspended immediately if there is any evidence that a device is causing injuries to employees or patients.

To help ensure that devices are handled safely and evaluations are objective, _____ (Director/Manager/Supervisor/PI) provide training on the safe and proper use of devices before testing begins. This training is given to the groups or individuals responsible for product selection, all participants involved in the testing, and their supervisors. Participants in the testing are also given the opportunity to practice using the new devices. These practice sessions simulate, as closely as possible, the tasks and procedures involved under “real-life” conditions. Representatives of manufacturers and distributors are requested to demonstrate the intended use of their products, answer questions, and train employees in the safe operation of each device.

“Tools”

Checklists, evaluation forms, or other types of standardized “tools” are used in the testing of new products. The tools are tailored to the specific category of product under consideration. To provide a standard basis for comparison among products, we use the same checklist or evaluation form when testing multiple products within a given type or category of device.

Protocols

_____ (Director/Manager/Supervisor/PI) may use protocols in our testing process to make the evaluation of new products more systematic. Protocols also help us document the details of each item involved in our testing process.

Selecting Products

After the testing is completed, all the information, including checklists and evaluation forms, is reviewed. Input from frontline employees involved in the testing is documented and considered when it is time to select products for purchase. Based on the analysis of all the available information, consensual decisions are made regarding whether to purchase particular products. If two or more products are found to be satisfactory in a given category, we consider purchasing them. _____ (Director/Manager/Supervisor/PI) document how devices ranked and which products we have decided to purchase. _____ (Director/Manager/Supervisor/PI) provide feedback to employees on the ranking and selection of products.

5. Use New Products

_____ (Director/Manager/Supervisor/PI) may introduce new products on a limited basis in a pilot implementation or trial phase. During this trial period, issues associated with the day-to-day use of the new products may arise. Employees may need time to develop new skills, establish new work practices, and break old habits. Employees are strongly encouraged to report any problems to their supervisors during the trial period. If problems appear to be serious or widespread, they are reported to the decision makers. Problems with new products are addressed as they arise and are resolved before the new product is used throughout our organization.

All staff members (and supervisors) using the new products or devices are thoroughly trained. This training is a mix of the knowledge and skills needed to work safely. For each new device, representatives of manufacturers and distributors are requested to:

- Demonstrate its proper use and application
- Answer questions
- Provide training on its safe operation
- Provide follow-up

Training also includes practice sessions to simulate the tasks and procedures that individuals will be performing with the new devices. Multiple devices may have been selected for a given task or procedure. If this is the case, individuals are trained on all the selected devices.

6. Conduct Follow-up

Follow-up helps ensure that new products are effective and appropriate and are replaced over time by newer, more effective technology. As newer products become available, they are screened, tested, and selected according to the process described previously.

Our follow-up process systematically reevaluates devices and incorporates the input of frontline employees who have been using the products. Decisions on the appropriateness and effectiveness of new devices are not made until employees have had enough time to adjust to using the products.

Follow-up evaluations of products and the associated work practices are conducted six months after the implementation and quarterly, semiannually, or annually thereafter. Findings are used to improve product selection and training.

Staff members receive periodic feedback on how new products are working and what other products have become available. Follow-up training is provided if problems are discovered with work practices or currently used devices. If newer devices are selected to replace those currently being used, all individuals (and their supervisors) using the newer devices are thoroughly trained.

