



**Campus Administrative Policy**

**Policy Title: Bloodborne Pathogens, Exposure Control & Hepatitis B  
Vaccination Policy**

Policy Number: 6003      Functional Area: Research

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Effective: September 12, 2014  
Date Last Amended/Reviewed: September 12, 2014  
Date Scheduled for Review: July 1, 2021  
Supersedes: Bloodborne Pathogens, Exposure Control  
& Hepatitis B Vaccination Policy  
December 2009, June 2007, March 2000,  
June 1994

Approved by: Richard J. Traystman  
Vice Chancellor for Research

Prepared by: Biosafety Office  
Reviewing Office: Vice Chancellor for Research  
Responsible Officer: Vice Chancellor for Research

Applies to: CU Anschutz  
CU Denver  
CU South Denver Location

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**A. Introduction**

Per the [NIH Grants Policy Statement](#) and the [Centers for Medicare and Medicaid Service \(CMS\) regulations](#), the Occupational Safety and Health Administration (OSHA) [Bloodborne Pathogens Standard 29 CFR 1910.1030](#) must be followed when developing and implementing health and safety procedures and practices for both personnel and facilities.

Grantee institutions and those accepting federal CMS reimbursements for patient care are responsible for meeting Federal, State, and local

health and safety standards; and for establishing and implementing necessary measures to minimize their employees' risk of injury or illness with respect to potential occupational exposure to bloodborne pathogens (BBP) or other potentially infectious materials (OPIM).

## **B. Policy Statement**

1. It is the intent of CU Denver and CU Anschutz to assure that the applicable standards, training and exposure control plans have been created and implemented to provide for the effective and efficient administration of the OSHA BBP Standard.
2. The Department of Environmental Health and Safety, under the auspices of the Office of Regulatory Compliance, will create and implement the appropriate training and an overall BBP/Exposure Control Plan for the CU Denver Campus and CU Anschutz Medical Campus units.
3. All CU Denver Campus and CU Anschutz Medical Campus units (schools, colleges, departments, centers, etc.) will comply with this policy and the University [Exposure Control Plan](#).
4. All personnel with potential occupational exposure to human blood, bodily fluids, tissues, cells and organs, and other potentially infectious materials will comply with the training and exposure control plans for the University. All personnel with potential occupational exposure to human blood, bodily fluids, tissues, cells and organs, and other potentially infectious materials will be offered the appropriate Hepatitis B immunizations, at no cost to the employee.

Departmental F&A funds, clinical and general operating funds have been determined to be acceptable sources for funding employee immunizations.

Immunizations for employees are available through the Occupational Health Program, Department of Environmental Health and Safety, at the CU Anschutz Medical Campus.

## C. Procedures

1. All CU Denver Campus and CU Anschutz Medical Campus units (schools, colleges, departments, centers, etc.) will assess the potential for exposure for each employee under their administrative control. The CU Denver Campus and CU Anschutz Medical Campus [Exposure Control Manual](#) provides further guidance on the exposure analysis and documentation. Questions on potential occupational exposures may be addressed to the [Biosafety Officer, Department of Environmental Health & Safety](#).
2. All employee job description/classification documents (PDQs, etc.) will be reviewed to determine if there is a potential occupational exposure to BBP and to determine the tasks and procedures which create the occupational exposure. Those positions having potential occupational exposure shall have that information reflected in the PeopleSoft HRMS.
3. Each University unit shall offer all employees having potential occupational exposure the Hepatitis B immunizations at no cost to the employee(s). Any employee who chooses to decline the Hepatitis B immunizations will complete a "[Letter of Declination](#)" available on the University web or from the Biosafety Office. A copy of that signed letter must be kept in the employee occupational health files.
4. Each CU Denver Campus and CU Anschutz Medical Campus academic unit should establish policies to assure the pre-matriculation immunization status of all students with potential exposures prior to their enrollment. Appropriate guidelines are available from the [American College Health Association](#) or from the [U.S. Centers for Disease Control and Prevention, Advisory Committee on Immunization Practices](#). Each CU Denver Campus and CU Anschutz Medical Campus program in the health professions (to include the Schools of Medicine and Graduate Medical Education, Dental Medicine, Pharmacy, and the College of nursing) will be responsible for establishing criteria for pre-matriculation immunization against Hepatitis B for their student populations in training for health care professions.

5. All employees and students with potential exposure will participate in the mandatory initial and annual refresher training offered by the CU Denver Campus and CU Anschutz Medical Campus Department of Environmental Health and Safety, or its equivalent.

## Notes

1. Dates of official enactment and amendments:  
June 1994: Approved  
March 2000: Reviewed  
June 2007: Reviewed  
December 2009: Reviewed  
September 12, 2014: Adopted by the Vice Chancellor for Research  
March 27, 2019: Modified
2. History:  
March 27, 2019: Modified to reflect a Campus-wide effort to recast and revitalize various Campus policy sites into a standardized and more coherent set of chaptered policy statements organized around the several operational divisions of the university. University branding and hyperlinks verified.
3. Initial Policy Effective Date: June 1994
4. Cross References/Appendix:  
NIH Grants Policy Statement
  - Centers for Medicare and Medicaid Service Regulations
  - Occupational Safety and Health Administration Bloodborne Pathogens Standard 29 CFR 1910.1030
  - University of Colorado Denver Exposure Control Plan
  - American College Health Association
  - U.S. Centers for Disease Control and Prevention, Advisory Committee on Immunization Practices.
  - Letter of Declination