



[OSHA Home](#)

[← Directives - Table of Contents](#)

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● Title:	Enforcement Procedures for the Occupational Exposure to Bloodborne Pathogens
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BLOODBORNE PATHOGENS TRAINING

Paragraph (g)(2). All employees with occupational exposure must receive initial and annual training on the hazards associated with blood and OPIM, and the protective measures to be taken to minimize the risk of occupational exposure.

The Compliance Officer should verify that the training is provided at the time of initial employment and at least annually thereafter. "At the time of initial assignment to tasks where occupational exposure may take place" means that employees must be trained prior to being placed in positions where occupational exposure may occur. The annual retraining for these employees must be provided within one year of their original training. Such training must be provided at no cost to the employee and during working hours.

Part-time and temporary employees, and healthcare employees, known as "per diem" employees, are covered and are also to be trained on company time.

The Compliance Officer should interview a representative number of employees from different work areas to determine that the training was presented in a manner that was appropriate.

Paragraph (g)(2)(vii)(N). This paragraph requires that there be an opportunity for interactive questions and answers with the person conducting the training session

Training the employees solely by means of a film or video without the opportunity for a discussion period would constitute a violation of this paragraph. Similarly, a generic computer program, even an interactive one, is not considered appropriate unless the employer supplements such training with the site-specific information required (e.g., the location of the exposure control plan and the procedures to be followed if an exposure incident occurs) and a person is accessible for interaction.

Trainees must have direct access to a qualified trainer during training. OSHA's requirement can be met if trainees have direct access to a trainer in person or by way of a telephone hot line. The use of an electronic mail system to answer employee questions is not considered direct access to a qualified trainer, unless the trainer is available to answer e-mailed questions at the time the questions arise.

Paragraph (g)(2)(viii). The person conducting the training is required to be knowledgeable in the subject matter covered by the elements contained in the training program as it relates to the workplace that the training will address. In addition to demonstrating expertise in the area of the occupational hazard of bloodborne pathogens, the trainer must be familiar with the manner in which the elements in the training program relate to the particular workplace.

The Compliance Officer should verify the competency of the trainer based on the completion of specialized courses, degree programs, or work experience, if he/she determines that deficiencies in training exist.

Paragraph (h)(2) requires accurate recordkeeping of training sessions, including titles of the employees who attend. The records are necessary to assist the employer and OSHA in determining whether the training program adequately addresses the risks involved in each job.

FAQs

Question: Is it possible to satisfy the requirements for annual training solely through an on-line course or prepackaged type course?

Answer: In OSHA's view, self-paced, interactive computer-based training can serve as a valuable training tool. However, use of computer-based training by itself would not be sufficient to meet the intent of the standard's various training requirements. OSHA urges employers to be wary of relying solely on generic "packaged" training programs in meeting their training requirements.

In summary, OSHA believes that computer-based and prepackaged training programs can be used as part of an effective safety and health training program to satisfy OSHA training requirements, provided that the program is supplemented by the opportunity for trainees to ask questions of a qualified trainer.

Question: What does it take to be a "qualified trainer"?

Answer: A "qualified trainer" is an individual whose training and experience adequately prepares the individual to train others. An example of a qualified trainer would be a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience has demonstrated the ability to train others.