

# Bloodborne Pathogens Exposure Control Plan — Bright Smile Dental Group

Compliance Document

Generated: March 1, 2026

DRAFT DOCUMENT — SAMPLE DOCUMENT — This is a sample document generated with fictional business information to demonstrate the quality and structure of CompliDoc output. Actual generated documents will be customized based on your specific business details, state requirements, and regulatory obligations. Documents are AI-generated drafts and should be reviewed by qualified professionals before implementation.

# 1. Purpose and Scope

---

## BLOODBORNE PATHOGENS EXPOSURE CONTROL PLAN

Bright Smile Dental Group  
4500 Professional Parkway, Suite 110  
Austin, TX 78759

Effective Date: [EFFECTIVE DATE]

This Exposure Control Plan (ECP) has been developed in accordance with the OSHA Bloodborne Pathogens Standard, 29 CFR 1910.1030, to eliminate or minimize employee exposure to blood and Other Potentially Infectious Materials (OPIM).

This plan applies to all employees of Bright Smile Dental Group who may reasonably anticipate contact with blood or OPIM as a result of performing their job duties. This includes dentists, dental hygienists, dental assistants, and janitorial staff who clean treatment areas.

The Exposure Control Plan is reviewed and updated at least annually and whenever new or modified tasks and procedures affect occupational exposure. A copy of this plan is accessible to all employees and is available upon request.

## 2. Exposure Determination

---

The following exposure determination has been made without regard to the use of personal protective equipment (PPE). Employees in the following job classifications have occupational exposure to blood or OPIM:

Job Classifications with Occupational Exposure:

- Dentists: All clinical procedures including examinations, restorations, extractions, periodontal treatment, and surgical procedures. Contact with blood, saliva, and contaminated instruments.
- Dental Hygienists: Prophylaxis, scaling and root planing, periodontal assessments, and radiographic procedures. Contact with blood, saliva, and contaminated instruments.
- Dental Assistants: Chairside assistance during all clinical procedures, instrument processing and sterilization, operatory cleanup, and impression taking. Contact with blood, saliva, contaminated instruments, and surfaces.
- Front Desk / Administrative Staff (Limited): No routine occupational exposure. May have incidental exposure when assisting patients in distress or handling contaminated items brought to the front desk.

Tasks and procedures in which occupational exposure occurs include: patient examinations, surgical and restorative procedures, instrument reprocessing and sterilization, operatory turnover and disinfection, handling of contaminated laundry, and disposal of regulated waste.

### 3. Methods of Compliance

---

Bright Smile Dental Group implements the following methods of compliance to eliminate or minimize employee exposure to bloodborne pathogens:

**Universal Precautions:** All employees shall observe Universal Precautions. All blood and OPIM shall be treated as if known to be infectious for HIV, HBV, HCV, and other bloodborne pathogens. In circumstances where differentiation between body fluid types is difficult or impossible, all body fluids shall be considered potentially infectious materials.

**Engineering Controls:** The practice utilizes the following engineering controls to minimize exposure: self-sheathing anesthetic needles, needleless IV systems where applicable, sharps containers in every operatory mounted at accessible locations, ultrasonic cleaners for instrument reprocessing, autoclave sterilization with biological monitoring, hands-free trash receptacles, and eyewash stations.

**Work Practice Controls:** Contaminated needles and sharps shall not be bent, recapped by hand, or removed from disposable syringes. If recapping is required, a one-handed scoop technique or recapping device must be used. Eating, drinking, smoking, applying cosmetics, and handling contact lenses is prohibited in treatment areas and instrument processing areas. Food and beverages shall not be stored in refrigerators, freezers, or cabinets where blood or OPIM are stored. All procedures involving blood or OPIM shall be performed to minimize splashing, spraying, and generation of droplets.

## 4. Hepatitis B Vaccination Program

---

Bright Smile Dental Group makes the Hepatitis B vaccination series available to all employees with occupational exposure, at no cost to the employee, within 10 working days of initial assignment to a position with occupational exposure.

Vaccination is offered after the employee has received required bloodborne pathogens training. Employees who decline the Hepatitis B vaccination must sign the OSHA-required Declination Statement (Appendix A of 29 CFR 1910.1030). Employees who initially decline may later opt to receive the vaccination at no cost.

The practice maintains vaccination records for each employee, including the dates of vaccination and any medical records relative to the employee's ability to receive vaccination. These records are maintained as confidential medical records in accordance with 29 CFR 1910.1020.

Post-vaccination testing (anti-HBs) is offered 1-2 months after the completion of the three-dose series to confirm immunity. Employees who do not develop adequate antibody response are counseled regarding their status and appropriate follow-up.