



HEPATITIS POLICY

EFFECTIVE DATE:	July 22, 2025 (Revised)
RESPONSIBLE ADMINISTRATOR:	Associate Dean of Clinical Affairs and Outreach
APPLICABILITY:	Faculty and Staff at Risk of Bloodborne Pathogen Exposure

I. PURPOSE

In accordance with the US Department of Labor- [Occupational Safety and Health Administration \(OSHA\) standards \(Standard 29 CFR 1910.1030\)](#)¹, the purpose of this policy is to establish procedures and processes for HCOP employees who are at risk of occupational bloodborne pathogen exposure. This includes HCOP employees whose job involves providing direct patient care and / or collecting, handling, processing, and disposing of human blood, human blood products, or other potentially infectious materials (such as human biospecimens). This includes HCOP employees who are designated to provide first aid, clean up spills, and / or handle or dispose of biohazardous waste.

II. POLICY

- HCOP is committed to ensuring employees are protected from the hazards associated with occupational bloodborne pathogen exposure.
- HCOP will comply with [Auburn University's Exposure Control Plan](#)¹ which outlines occupational safety policies, procedures, and processes intended to protect our employees from the risk of bloodborne pathogen exposure and infection.
- In accordance with [AU's Exposure Control Plan](#)¹, HCOP supervisors will be responsible for identifying every full-time, part-time, and temporary (TES) employee (faculty, staff, graduate students, student workers, work-study students) under their supervision who could potentially be exposed to bloodborne pathogens while fulfilling their job responsibilities. This includes potential occupational exposure associated with clinical and research activities, as well as tasks associated with cleaning clinic and laboratory spaces and handling / disposing of human blood, human blood components, human blood products, and / or human biospecimens. ([See Appendix A and B of the AU Exposure Control Plan](#)).
- The principal investigator (PI) or laboratory supervisor for each research lab must compile a list of laboratory-specific lab or workplace procedures that pose a bloodborne pathogen exposure risk and outline the method that will be used to minimize the risk of occupational exposure. ([See Appendix C of the AU Exposure Control Plan](#)).
- Every employee who is identified at risk of bloodborne pathogen exposure must acknowledge that they have read [AU's Exposure Control Plan for Bloodborne Pathogens](#) and understand that their job responsibilities places them at risk of bloodborne pathogen exposure by completing and signing [Appendix E of the AU Exposure Control Plan](#).

- Every employee who is at risk can request a Hepatitis B vaccine series (which will be provided at no cost when services are provided through the Auburn University Pharmaceutical Care Center (AUPCC) or at an off-site pharmacy or clinic if pre-approved by the employee's supervisor (see procedures section).
- Every employee who is at risk must provide one of the following **BEFORE** their start date and **BEFORE** engaging in any clinical or laboratory activities that put them at risk of bloodborne pathogen exposure:
 - 1) Documentation of completion of the Hepatitis vaccine series (3 dose series) **OR**
 - 2) Hepatitis B Antibody Blood Titer laboratory results indicating a "reactive" hepatitis B surface antibody (anti-Hbs) consistent with Hepatitis B immunity **OR**
 - 3) A completely executed Hepatitis B Vaccine Waiver ([see Appendix E of the AU Exposure and Control Plan](#))
- Failure to provide this documentation within one (1) month of the employee's start date will result in the **REMOVAL** of the employee from all clinical and/ or laboratory job duties until proper documentation is provided to the employee's supervisor **AND** the employee's clinical practice site (if applicable). In addition, disciplinary action may be initiated against the employee (up to and including possible dismissal).
- This policy does not preclude an employee from choosing to receive either a vaccination series or Hepatitis B titer at a later date should they initially decline.
- HCOP employees who are at an exposure risk must complete **ANNUAL** training on safety precautions (universal precautions, bloodborne pathogens, and biohazardous waste disposal).
 - Training modules may be accessed either through the employee's departmental compliance training site (such as CANVAS), the principal investigator's laboratory Bioraft site, or other method outlined by the employee's supervisor.
 - The employee should discuss this with their supervisor to clarify how this annual compliance requirement must be accessed, completed, and documented.
 - Upon completion of this designated training, the HCOP faculty or staff member will follow departmental policies and procedures to report completion to their supervisor.

III. PROCEDURES

A. HCOP CLINICAL AFFAIRS AND OUTREACH (CAO):

- All employees working within CAO settings are required to complete a Hepatitis B form upon hire ([See Appendix E of the Auburn University Exposure Control Plan](#)).
Responsible party: Executive Director of Clinical Health Services
- HCOP CAO employees who wish to receive either a Hepatitis B vaccine series, or a Hepatitis titer, will receive these services at **NO COST** to the employee through the Auburn University Pharmaceutical Care Center (AUPCC) [Auburn Main Campus, Auburn, AL] or the State Wellness Center (SWC) [Montgomery, AL].
- HCOP CAO employees may also independently obtain these at an outside facility and provide documentation of vaccination or laboratory results to the AUPCC. However, services provided at non-HCOP facilities **WILL NOT** be reimbursed by the HCOP.

B. DEPARTMENT OF PHARMACY PRACTICE:

- All Pharmacy Practice employees who work in clinical practice sites (or have other occupational risk of bloodborne pathogen exposure) are required to complete a Hepatitis B form upon hire ([See Appendix E of the Auburn University Exposure Control Plan](#)). Responsible party: Department Head of Pharmacy Practice
- Auburn-based pharmacy practice faculty and staff who wish to receive either a Hepatitis B vaccine series or a Hepatitis B titer will receive these at **NO COST** to the employee through the Auburn University Pharmaceutical Care Center (AUPCC) (2155 Walker Building, Auburn University, AL | aupcc4u@auburn.edu | Phone: (334) 844-4099 | FAX: (334) 844-4019).
 - Documentation of these clinical services and laboratory results will be maintained in the AUPCC's secure electronic medical record (EMR).
 - The employee's supervisor can contact the AUPCC to obtain confirmation that the employee is compliant.
- Pharmacy practice faculty assigned to other regions can independently obtain these at an outside facility with prior approval from the Department Head of Pharmacy Practice.
 - The employee must provide documentation showing completion of the hepatitis B vaccine series **OR** laboratory results showing a "reactive" hepatitis B surface antibody (anti-Hbs) consistent with immunity to the Auburn University Pharmaceutical Care Center (AUPCC) (2155 Walker Building, Auburn University, AL | aupcc4u@auburn.edu | Phone: (334) 844-4099 | FAX: (334) 844-4019).
 - The AUPCC will store these documents in the clinic's secure electronic medical record (EMR) to safeguard the employee's protected health information (PHI).
 - The employee's supervisor can contact the AUPCC to obtain confirmation that the employee is compliant.
 - Costs associated with pre-approved clinical services provided by external facilities will be reimbursed by the Department of Pharmacy Practice.

C. RESEARCH FACULTY, STAFF, AND GRADUATE STUDENTS:

- All HCOP research employees who are at risk of bloodborne pathogen exposure are required to complete a Hepatitis B form upon hire ([See Appendix E of the Auburn University Exposure Control Plan](#)).
Responsible party: Research Laboratory Principal Investigator and Department Head
- HCOP research employees who wish to receive either a Hepatitis B vaccine series or a Hepatitis B titer will receive these at **NO COST** to the employee through the Auburn University Pharmaceutical Care Center (AUPCC) (2155 Walker Building, Auburn University, AL | aupcc4u@auburn.edu | Phone: (334) 844-4099 | FAX: (334) 844-4019).
 - Documentation of these clinical services and laboratory results will be maintained in the AUPCC's secure electronic medical record (EMR).
 - The employee's supervisor can contact the AUPCC to obtain confirmation that the employee is compliant.

- HCOP research employees can independently obtain these clinical services at an outside facility with prior approval from their direct supervisor and/or department head.
 - The employee must provide documentation showing completion of the hepatitis B vaccine series **OR** laboratory results showing a “reactive” hepatitis B surface antibody (anti-HBs) consistent with immunity to the Auburn University Pharmaceutical Care Center (AUPCC) (2155 Walker Building, Auburn University, AL | aupcc4u@auburn.edu | Phone: (334) 844-4099 | FAX: (334) 844-4019).
 - The AUPCC will store these documents in the clinic’s secure electronic medical record (EMR) to safeguard the employee’s protected health information (PHI).
 - The employee’s supervisor can contact the AUPCC to obtain confirmation that the employee is compliant.
 - Costs associated with pre-approved clinical services provided by external facilities will be reimbursed by the PI of the Research Lab or the Department Head.

IV. POLICY MANAGEMENT

This policy will be reviewed by HCOP’s Clinical Services Advisory Committee (CSAC) and the Associate Dean of Clinical Affairs and Outreach (ADCAO) at a minimum of every three (3) years, or more frequently if there is a substantive change to clinical guidelines / best practices; AU Risk Management policies, procedures, or processes; or HCOP policies, procedures, or processes that necessitate earlier review and revision.

V. DEFINITIONS

Blood:	<u>Human blood and human blood components, including, but not limited to:</u>	
	<ul style="list-style-type: none"> • Whole Blood • Red Blood Cells • White Blood Cells • Platelets • Plasma • Fresh Frozen Plasma 	<ul style="list-style-type: none"> • Serum • Human Platelet Lysate • Cryodepleted Plasma • Granulocytes • Cryoprecipitate
Blood Products:	<u>Products manufactured from human blood plasma, including, but not limited to:</u>	
	<ul style="list-style-type: none"> • Albumin • Coagulation Factor Concentrates 	<ul style="list-style-type: none"> • Immunoglobulins
Bloodborne Pathogen:	Any pathogenic microorganism that may be present in human blood, blood components, or blood products that may cause human disease. These include, but are not limited to:	
	<ul style="list-style-type: none"> • Human Immunodeficiency Virus (HIV) • Hepatitis A • Hepatitis B • Hepatitis C 	<ul style="list-style-type: none"> • Malaria • Syphilis • Babesiosis • Brucellosis • Leptospirosis
Occupational Exposure:	Any reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that results from an employee performing their assigned job duties / functions.	

Auburn University Pharmaceutical Care Center (AUPCC):	<p>A free-standing pharmaceutical care clinic that is located on Auburn University's main campus at 2155 Walker Building. For more information, visit AUPCC's website.</p> <ul style="list-style-type: none"> • Phone: (334) 844-4099 • FAX: (334) 844-4019 • Aupcc4u@auburn.edu
Clinical Services Advisory Committee (CSAC):	<p>A standing HCOP committee composed of faculty, staff, and students who provide guidance for HCOP's clinical initiatives, oversight of clinical and regulatory compliance, input on HCOP's clinical outreach, and recommendations for pharmacy advancement and transformation.</p>

VI. EXCLUSIONS

HCOP faculty and staff whose HCOP job responsibilities pose **NO RISK** of bloodborne pathogen exposure.

VII. EFFECTIVE DATE

- Original October 23, 2019
- Revised November 11, 2021
- Revised August 13, 2023
- Revised May 27, 2025
- Revised July 22, 2025

VIII. SANCTIONS

Failure to comply with this policy may result in suspension and progressive discipline of the employee (up to and including possible dismissal).

IX. INTERPRETATION

- Associate Dean of Clinical Affairs and Outreach
- Executive Director of Clinical Health Services
- Department Heads

X. REFERENCES / RESOURCES

1. Occupational Safety and Health Administration (OSHA) Standard Number 1910.1030- Bloodborne Pathogens. United States Department of Labor- Occupational Safety and Health (OSHA). May 14, 2019. Accessed July 21, 2025. <https://pharmacy.auburn.edu/about/policies.php>
2. Auburn University Exposure Control Plan. Auburn University Risk Management and Safety. January 1, 2006. Accessed July 21, 2025. <https://cws.auburn.edu/shared/content/files/1382/exposurecontrolplan.pdf>