TEAM HUDDLE: Understanding the Responsibility of Infection Prevention and Control: The Importance of Written Documents

Dental infection prevention and control is a system of policies and procedures designed to ensure the use of best practices to enhance safety and reduce the risk of transmitting potentially dangerous microbes from the treatment environment and support areas. An effective infection control program hinges on the understanding of the WHAT, the WHY, and the HOW of the preventive policies and procedures as well as techniques that enhance compliance.

LEARNING OBJECTIVES

After reading this publication, the reader should be able to:

• describe the importance of an Exposure Control Plan and Standard Operating Procedures.
• give examples of infection control and safety documents and records that need to be present in dental facilities.
Dr. Poe was about to accept several new patients from a dentist classmate who was retiring. So, Dr. P wanted to activate his previously unused second operatory and hire a new dental assistant. Just as he was ready to make the changes, Dr. P’s only dental assistant (Mona) informed him that she had to immediately move out of state to take care of her ailing parents.

Dr. P was fortunate to find and hire a very experienced replacement (Tristen) from the recently closed practice, and she was to identify and train a new second assistant. Tristen asked Dr. P if she could see the office’s Exposure Control Plan (ECP) and Standard Operating Procedures (SOPs) to help train the new assistant.

Dr. P said that he left a lot of the “behind the scenes” infection control procedures up to Mona, and he didn’t think she ever wrote them down.

Tristen said she could figure out many procedures used by seeing the products and equipment on hand, but there were several questions she had that Dr. P couldn’t answer. For example:

- How long do you ultrasonically clean each batch of instruments?
- What is done if some of the instruments are not well cleaned?
- How are the handpieces cleaned before sterilization?
- How often do you change the ultrasonic cleaning solution?
- What instruments are processed through the dry heat sterilizer rather than the autoclave?
- What type of water is used in the autoclave reservoir?
- Who is called for sterilizer and cleaner repair and maintenance service?
- How often do you monitor the dental unit waterlines?
- How do you disinfect the vacuum lines and how often do you change the traps?
- Which office surfaces are cleaned by the housekeeping staff?
- Who has been identified to serve as the evaluating healthcare provider in the event of an exposure incident?
- Who calls the evaluating healthcare provider after an exposure incident?
- How do you rotate sterile instrument packages?
- How do you identify the availability of safer injection syringes/needles and other safer medical devices for evaluation?
Potential Consequences and Prevention

(See further details, pg 4, “Strategies”)

Dr. P needs to have a better understanding of his office procedures, and he needs to enhance compliance with infection control regulations and recommendations.

Dr. P said that he left a lot of the “behind the scenes” infection control procedures up to Mona, and he didn’t think she ever wrote them down.

WHAT: The Occupational Safety and Health Administration (OSHA) Bloodborne Pathogens Standard requires employers with employees who have exposure to bloodborne pathogens to have a written ECP. The Centers for Disease Control and Prevention (CDC) recommends having written SOPs for infection prevention in dental facilities.

WHY: ECPs and SOPs are important in maintaining a safe and compliant healthcare facility because they serve as the foundation of the infection control program.

1. Not having an ECP violates the OSHA Bloodborne Pathogens Standard. If an OSHA inspection ever occurs from a possible infection control violation, an early demand from the inspector will be “may I see your ECP.” The ECP identifies how infection control is to be managed in the practice, and the inspector wants to determine if the ECP is being followed.

2. CDC recommends to “develop and maintain written infection prevention policies and procedures appropriate for the services provided by the facility and based on evidence-based guidelines, regulations or standards.”

3. A successful infection control program depends upon developing SOPs.

4. Clearly written policies, procedures and guidelines can help ensure consistency, efficiency and effective coordination of activities.

5. Written procedures facilitate initial and periodic infection control training of employees.

6. Written SOPs are used in evaluating the infection prevention program.

7. Without written SOPs it’s highly likely that prompt management and medical follow-up of an exposure incident may not occur. Since exposure incidents are usually not common occurrences, unwritten procedures can be forgotten which could lead to confusion and delay in evaluation and care.

HOW: Exposure Control Plan

The OSHA-required ECP is to contain at least the following sections:

- Exposure determination (a list of all job classifications in which all employees in those classifications have occupational exposure; a list of all job classifications in which some employees have occupational exposure; a list of all tasks and procedures in which occupational exposure occurs and that are performed by employees in job classifications listed)

- Implementation of various methods of exposure control, including:
  - Universal precautions/standard precautions
  - Engineering and work practice controls
  - Personal protective equipment (PPE)
  - Housekeeping and surface decontamination
  - Waste management
  - Consideration and evaluation of safer medical devices
  - Laundry management

- Hepatitis B vaccination procedures

- Post-exposure evaluation and follow-up procedures

- Communication of biohazards to employees

- Recordkeeping procedures

- Procedures for evaluating circumstances surrounding exposure incidents.

OSHA has a model ECP and a Hazard Communication program available, but they must be modified to fit your office.

Since the OSHA Bloodborne Pathogens Standard does not mention instrument sterilization, these SOPs and policies will have to be added to OSHA’s ECP.
HOW WOULD YOU SCORE?
Use this checklist to see if you have these U.S. infection prevention and safety documents/records on hand.

Regulatory and Guidance Documents and App
- OSHA Bloodborne Pathogens Standard
- OSHA Hazard Communication Standard
- OSHA Emergency Standards:
  - osha.gov/SLTC/etools/evacuation/evaluate.html
    - [ ] Design and Construction requirements for exit routes
    - [ ] Emergency action plans*
    - [ ] Fire prevention plans*
    - [ ] Maintenance, safeguards and operational features for exit routes
    - [ ] Portable fire extinguishers
    - [ ] Fire detection systems
    - [ ] Fire extinguishing systems
    - [ ] Fire alarm systems.
- State, local or other regulatory documents that may apply (e.g., sterilization monitoring, waste disposal)
- CDC Guidelines for Infection Control in Dental Health-care Settings – 2003
- CDC Summary of Infection Prevention Practices in Dental Settings: Basic Expectations for Safe Care
- CDC DentalCheck app (cdc.gov/features/dental-check-app/index.html)

Policy Documents
- OSHA written Exposure Control Plan
- OSHA written Hazard Communication program
- CDC written health program for employees
- CDC tuberculosis infection control plan
- Policies not covered by OSHA (e.g., state regulations on instrument sterilization, sterilization monitoring, waste management and waterline management and testing)
- OSHA poster “Job Safety and Health”- publication number 3165 (see osha.gov/Publications/poster.html)

Records
- OSHA Bloodborne Pathogens Standard and Hazard Communication training records
- OSHA required written schedule for cleaning and disinfecting areas in the facility
- OSHA confidential employee medical records
  - [ ] Includes written opinions from evaluating healthcare provider on employee vaccination status and post-exposure evaluation and follow-up when needed
- Hepatitis B vaccination declination (refusal) forms (if needed)
- Exposure incident reports
- Results from sterilization monitoring (mechanical, chemical and biological)
- Records on the routine maintenance of sterilization equipment
- Radiographic equipment certification
- Manifests from regulated medical waste haulers
- Verification of on-site treatment of regulated medical waste (if needed)
- Safety data sheets for hazardous chemicals used
- Chemical list
- Annual sharps safety screening/evaluation forms
- Dental unit waterlines testing records

* If 10 or fewer employees, plans may be oral rather than written. This only applies to the emergency action plan and fire prevention plan not to SOPs or ECPs.
Help Us Take Safety Viral

We’re ramping up for Dental Infection Control Awareness Month (DICAM) taking place this September and challenge you to join our movement to “Take Safety Viral”.

OSAP’s DICAM campaign is to reach a broad digital audience to educate more dental teams, clinicians, and infection control coordinators on the Safest Dental Visit™. Every week will have a different dental infection control theme with tips, scripts, and more. This campaign is important to help advance patient safety and increase your patients’ confidence in your infection control practices.

Ready to get involved?

Join our DICAM priority email list for advance notice of campaign tools and themes! Register now at osap.org/DICAM

We’re excited to support your efforts to make every visit the Safest Dental Visit™. Let’s “Take Safety Viral”! #DICAM19

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OSAP thanks the following companies that help to underwrite each issue of this special series of Infection Control in Practice: Team Huddle™ in 2019.

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Educational Spotlight

Be The First To Know

DENTAL INFECTION CONTROL AWARENESS MONTH | SEPTEMBER

What’s Wrong With This Picture?

Can you identify the breach(es) in this photo of a dental procedure?

Answer: 

- The clinician is not wearing protective eyewear.
- The patient has not been given protective eyewear.
- The clinician is not wearing long-sleeved protective clothing or overgown, leaving forearms and neck exposed during a procedure that will cause splatter. It is hoped that the light handle and handpiece hose/connector will be cleaned and disinfected during operatory clean-up.

Note:

- Documents on employee health, OSHA training, chemical safety, sterilization and waste management will be discussed in the next issue of Infection Control in Practice.
Take the Micro-Learning Silent Video Challenge!
Can you identify the actions in this short video that breach infection control?
osap.org//2019-08video
Challenge your knowledge and compare to the lesson below.

The Scenario: Personal Protective Equipment

Links to Resources
1. OSHA. Bloodborne Pathogens. Accessed June 2019 at:

Glossary

Standard Operating Procedures (SOPs): a set of step-by-step instructions compiled by an organization to help workers carry out complex routine operations
GET YOUR CE CREDIT ONLINE
OSAP is recognized by the American Dental Association as a CERP provider.*

Follow the instructions below to complete the quiz to receive 1 hour of CE credit FREE to OSAP members!

Step 1: Go to bit.ly/OSAPICIPAUGUST2019 and obtain access to the CE exam through the OSAP Store. OSAP members, 1 CE credit FREE! Non-members, 1 CE credit $20.

Step 2: OSAP will send you a registration confirmation email and a separate email with the link to the online CE exam. Click on that link to access the exam.

Step 3: Complete the online exam. You have 2 attempts to pass with 7 out of 10 correct answers. When finished, you can print out or download your CE record of completion for your records. Your record of completion will also be emailed to you.

QUESTIONS FOR ONLINE QUIZ

1. Which governmental agency requires each dental facility to post the “Job Safety and Health” poster?
   a. CDC
   b. OSHA
   c. FDA
   d. EPA

2. Which governmental agency requires each dental facility to have a written Exposure Control Plan?
   a. CDC
   b. EPA
   c. FDA
   d. OSHA

3. Keeping records on the routine maintenance of sterilization equipment comes from what governmental agency?
   a. CDC
   b. OSHA
   c. FDA
   d. EPA

4. SOPs for infection prevention aid in training of employees, ensuring consistency, efficiency and effective coordination of activities, and in:
   a. billing patients.
   b. filling cancelled appointments.
   c. evaluating the program.
   d. categorizing hazardous chemicals.

5. Plans for Emergency Action and Fire Prevention may be stated orally rather than being written in facilities with how many employees?
   a. 1-10
   b. 11-25
   c. 26-50
   d. Over 50

6. The exposure determination is part of what document?
   a. Fire Prevention Plan
   b. Radiographic Equipment Certification
   c. Emergency Action Plan
   d. Exposure Control Plan

7. What type of SOP should be organized under the “Behind the Scenes” heading?
   a. Immunizations and testing
   b. Patient mouth-rinsing
   c. Sharps safety
   d. Aseptic retrieval

8. An Exposure Control Plan has several sections including hepatitis B vaccination procedures, post-exposure evaluation and follow-up procedures, communication of biohazards to employees, and:
   a. collection of safety data sheets.
   b. listing of hazardous chemicals used.
   c. instrument sterilization procedures.
   d. recordkeeping procedures.

9. Which governmental agency has a model ECP and Hazard Communication program available?
   a. CDC
   b. OSHA
   c. FDA
   d. EPA

10. Which governmental agency recommends that dental health care facilities have a written tuberculosis infection control plan?
    a. CDC
    b. OSHA
    c. FDA
    d. EPA

KEY TAKEAWAYS

1. An ECP and SOPs are the foundation of the infection control program.
2. Adherence to these documents are key to providing patient and workers safety, training of employees, and evaluating the office safety program.
3. All dental facilities are to have several infection prevention and safety documents on hand.

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Moving Forward!
Updates on the New Dental Infection Control Education and Certification Programs

OSAP, the Dental Assisting National Board (DANB) and the Dental Auxiliary Learning Education (DALE) Foundation are collaborating on a dental infection control education program and two professional certifications.

The initiative establishes three main elements:

- **OSAP-DALE Foundation Dental Infection Prevention and Control Certificate Program™**
  - A standardized dental infection control educational program

- **Certified in Dental Infection Prevention and Control™ (CDIPC™)**
  - A clinically-focused professional certification

- **Dental Industry Specialist in Infection Prevention and Control™ (DISIPC™)**
  - An industry (dental trade)-focused professional certification

These collaborative initiatives advance the organizations’ missions of enhancing patient and practitioner safety.

Discover how an educational certificate program and/or a professional certification can help you elevate your professional value in dentistry and lead the next generation of dental infection preventionists.

Find out more at: dentalinfectioncontrol.org

FROM THE Editor’s Desk

OSHA’s Dentistry section presents information on;
- beryllium,
- bloodborne pathogens,
- ergonomics,
- mercury,
- silica dust,
- waste anesthetic gases,
- record keeping,
- hazard communication,
- and others.

Check it out at: osha.gov/SLTC/dentistry/recognition.html