## HEPATITIS B VACCINATION RECORDS By: Archie Jennings

When you hire an employee that will be or may be coming in contact with blood or other potentially infectious body fluids, then the practice is required to obtain the HBV vaccination status of the employee.

The HBV vaccination record may take one of four forms;

- The 3 shot vaccination record of the employee
- A copy of a lab test showing a positive titer test
- A document signed by the employee stating they have been vaccinated in the past and do not want a titer or the vaccination series
- A document signed by the employee declining the vaccination for what ever reason they choose

If there is any hesitation on the employees part as to whether they know they have been vaccinated, then you must offer the employee a titer to check for anti-bodies to HBV or begin the HBV vaccination series at no cost to the employee.

Please do not accept the "Yeah, I think I had it in Atlanta about 1999" from the new employee and then go on about your business. That will not fly with OSHA.

OSHA shows no mercy to practices who fail to obtain the HBV vaccination status of "at risk employees". The reason is that until 1985 the healthcare industry averaged over 13,000 healthcare employees contracting HBV annually. Over 500 employees died every year from contracting HBV from an incident in the healthcare setting.

In 1985 we began vaccinating healthcare employees and by 2005, the number of healthcare employees contracting HBV on the job was reduced from 13,000 annually to less than 50.

Make sure when you hire an "at risk employee", you make it part of the orientation program to obtain the HBV vaccination status of the employee. You have only 10 days after you put the employee at risk of coming in contact with blood or other potentially infectious body fluids to obtain their HBV vaccination status or begin the HBV vaccination shots.

The practice is put at risk of non-compliance with OSHA by not having proper documentation for "at risk employee's" which could lead to a possible fine. Also improper documentation could lead to potential civil litigation from the employee if they did contract HBV from an incident in the practice.

The bottom line is that if a practice puts an employee at risk of coming into contact with blood or other potentially infectious body fluids, then the practice must document HBV vaccination status for each of these employees or offer the vaccination to the employee at no cost to the employee within 10 days of putting them at risk.

Mr. Jennings is the Owner of Total Healthcare Compliance & Consulting in Palm Harbor, Florida. His company provides compliance services to many organizations, including OSHA, the Florida Department of Health (FDOH), CLIA, and HIPAA, involving over 600 healthcare entities in Florida, Texas, Louisiana, and Georgia. He earned his Bachelor of Science degree in Marketing and has a Bachelor's degree in

Computer Science. He is accredited by the U.S. Department of Labor, is an OSHA Approved Trainer as well as Certified Healthcare Compliance Officer, and has been certified by FDOH. Mr. Jennings has made numerous presentations for OSHA, the Florida Department of Health Regulations, and HIPAA.

Originally in Jan/Feb 2012

Tags: Staffing, Healthcare