

1999 California Bloodborne Pathogens Standard
University of California, San Francisco
COMPLIANCE DECISION LOG

The revised BBP Standard requires that you replace your standard sharp devices with sharps incorporating engineered injury protection features when there is a possibility of exposure to potential sources of bloodborne pathogens. Sharps include needles (suture, hypodermic, etc.), blades (scalpel, razor, etc.) and other items with edges or protuberances capable of cutting or piercing. This form will help you determine whether this is feasible and, if not, provide a place to document your decision. Its use is voluntary.

To work through this process, think about the procedures in your lab that use needles or blades. If the sharp cannot be replaced with a blunt (for example, a needle replaced with a cannula), determine whether the needle or blade can be replaced with a safer version. The following four exceptions are provided in the standard as the only acceptable reasons for rejecting a safer sharp. If you decide not to adopt a safer sharp, briefly describe the procedure, identify the exception(s) on which you base your rejection, and provide a brief explanation of your reasoning. Place a copy of this completed form behind Tab #8 in your lab's Biological Safety Logbook. This will demonstrate that you have tried to adopt a safe sharp but are unable to do so for legitimate reasons provided in the Standard.

Remember – if you replace a sharp with a non-sharp, or adopt a safer sharp, you do not need this form.

(1) Briefly describe the procedure for which you will not adopt a safer sharp at this time:

(2) Determine which of the four following exceptions apply:

- Market Availability. The safe device I would need to replace the standard device is not available in the marketplace.
- Subject Safety. As a medical/biomedical professional, I have determined that use of any available safety device will jeopardize the safety of the experimental subject or the success of the procedure involving an experimental subject. If a human patient is involved, there are special documentation requirements – contact the Biosafety Officer at 62097.
- Safety Performance. For this specific purpose, based on objective product evaluation criteria, the safe devices available are not more effective in preventing exposure incidents than the device I currently use.
- Availability of Safety Performance Information. Reasonably specific and reliable information is not available on the safety performance of the safe device for this procedure. I am in the process of determining, using objective product evaluation criteria, whether the use of the safe device will reduce the risk of exposure incidents in my laboratory.

(3) Explain why you selected that exception:

signature

position or title

date