

VOSH PROGRAM DIRECTIVE: 02-400C

ISSUED: 01 February 2014

<b><u>Subject</u></b>	<b>Enforcement Procedures for the Occupational Exposure to Bloodborne Pathogens</b>
<b><u>Purpose</u></b>	<p><b>CHANGES I and II:</b> This Directive transmits to field personnel established policies and clarifications to ensure uniform inspection procedures are followed when conducting inspections to enforce the Occupational Exposure to Bloodborne Pathogens Standard.</p> <p><b>CHANGE III:</b> This Change provided a Recordkeeping attachment for Virginia Unique Standard, §1910.20, Access to Employee Exposure and Medical Records. <b>CHANGE IV:</b> In the Recordkeeping section (section H.) of the former VOSH Program Directive 02-400B, there were references to the former VOSH unique standard, §1910.20, Access to Employee Exposure and Medical Records. This Change removes those references for VOSH and replaces them with references to the federal version of that standard, §1910.1020.</p> <p><i>This Program Directive is an internal guideline, not a statutory or regulatory rule, and is intended to provide instructions to VOSH personnel regarding internal operation of the Virginia Occupational Safety and Health Program and is solely for the benefit of the program. This document is not subject to the Virginia Register Act or the Administrative Process Act; it does not have general application and is not being enforced as having the force of law.</i></p>
<b><u>Scope</u></b>	This Directive applies to all VOSH personnel.
<b><u>Reference</u></b>	<p>CHANGE I: OSHA Instruction CPL 2-2.44C (5 March 1992);</p> <p>CHANGE II: OSHA Instruction CPL 2-2.44D (5 November 1999);</p> <p>CHANGE III: OSHA Instruction CPL 02-02-069 (formerly CPL 2-2.69) (27 November 2001); and</p> <p>CHANGE IV: 16VAC25-90-1910.1020, Access to Employee Exposure and Medical Records</p>
<b><u>Cancellation</u></b>	<p>CHANGE I: VOSH Program Directive 02-400 (01 April 1992)</p> <p>CHANGE II: VOSH Program Directive 02-400A (15 February 2000)</p> <p>CHANGE II: VOSH Program Directive 02-400B (01 February 2002)</p>
<b><u>Effective Date</u></b>	<p>CHANGE I: 01 June 1992</p> <p>CHANGE II: 01 March 2000</p> <p>CHANGE III: 01 February 2002</p> <p>CHANGE IV: 01 February 2014</p>
<b><u>Action</u></b>	Directors and Managers shall ensure that VOSH field personnel are advised of the changes and that employers are aware of and comply with the requirements of this standard.

William P. Burge  
Acting Commissioner

Attachment: [http://www.osha.gov/OshDoc/Directive\\_pdf/CPL\\_2-2\\_69.pdf](http://www.osha.gov/OshDoc/Directive_pdf/CPL_2-2_69.pdf)

Distribution: Commissioner of Labor and Industry  
Assistant Commissioner - Programs  
VOSH Directors and Managers  
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When the guidelines, as set forth in this Program Directive, are applied to the Department of Labor and Industry and/or to Virginia employers, the following federal terms if, and where they are used, shall be considered to read as below:

Federal Terms

VOSH Equivalent

OSHA

VOSH

Federal Agency

State Agency

Agency

Department

Regional Administrator

Assistant Commissioner

Area Director

Regional Director  
VOSH Program Director

Area Office/Regional Office

Regional Office

Regional Solicitor

Attorney General or VOSH  
Office of Legal Support (OLS)

Office of Statistics

VOSH Research and Analysis

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VOSH Standard

Compliance Safety and Health Officer (CSHO)  
and/or Industrial Hygienist

CSHO

*OSHA Field Operations Manual (FOM)*

*VOSH Field Operation Manual (FOM)*

OSHA Directives:

VOSH Program Directives:

CPL 2.103, Field Inspection Reference  
Manual (FIRM) (9/26/94)

02-001G, VOSH Field Operations Manual (FOM)  
(10/1/13)

CPL 2.111, Citation Policy for  
Paperwork and Written Program Violations (11/27/95)

01-009A, Citation Policy for Paperwork and Written  
Program Requirement Violations (10/15/07)

CPL 2-2.33, Rules of Agency Practice and Procedure  
Concerning OSHA Access to Employee  
Medical Records (2/8/82)

02-022A, Rules of Agency Practice and Procedure  
Concerning OSHA Access to Employee Medical  
Records (11/1/09)