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The BD Technical Services Department receives many questions about our products. To address these questions, we have developed a news bulletin called "Tech Talk" to be sent out periodically.

Reminder: OSHA's Position on Reuse of Holders

On October 15, 2003, the Occupational Safety and Health Administration (OSHA) posted a Safety and Health Information Bulletin (SHIB) to clarify the OSHA position on reusing tube holders during blood collection procedures. The purpose of the SHIB was to reiterate OSHA's earlier statement that the best practice to prevent needlestick injuries following phlebotomy procedures is the use of a sharp with engineered sharps injury protection (SESIP) (e.g. safety needle) attached to the blood tube holder, and the *immediate disposal of the entire unit after each patient's blood is drawn.*

Q. What are the steps that need to be taken to evaluate my current work practices versus the latest OSHA SHIB?

A. The OSHA SHIB provides the following step-by-step Toolbox for a facility to follow:

Evaluation Toolbox

- Employers must first evaluate, select, and use appropriate engineering controls (e.g., sharps with engineered sharps injury protection), which include single-use blood tube holders with sharps with engineered sharps injury protection (SESIP) attached.
- The use of engineering and work practice controls provide the highest degree of control in order to eliminate potential injuries after performing blood draws. Disposing of blood tube holders with contaminated needles attached after the activation of the safety feature affords the greatest hazard control.
- In very rare situations needle removal is acceptable.
 - If the employer can demonstrate that no feasible alternative to needle removal is available (e.g., inability to purchase single-use blood tube holders due to a supply shortage of these devices)
 - If the removal is necessary for a specific medical or dental procedure
- In these rare cases, the employer must ensure that the contaminated needle is protected by a SESIP prior to disposal. In addition, the employer must ensure that a proper sharps disposal container is located in the immediate area of sharps use, and is easily accessible to employees. This information must be clearly detailed and documented in the employer's Exposure Control Plan.
- If it is necessary to draw blood with a syringe, a syringe with engineered sharps injury protection must be used in which the protected needle is removed using safe work practices, and transfer of blood from the syringe to the tube must be done using a needleless blood transfer device.

Q. When does the OSHA SHIB go into effect?

A. The OSHA SHIB is simply a clarification of the OSHA Bloodborne Pathogens Standard [29 CFR 1910.1030 (d) (2) (vii) (A)]. The standard prohibits the removal of a contaminated needle from a medical device. Prohibition of needle removal is addressed in the 1991 and 2001 standards, the OSHA compliance directive (CPL 2-2.69), as well as a 2002 letter of interpretation. Therefore, there is no grace period.

Q. Does the OSHA SHIB apply to all phlebotomy devices?

A. Yes, it applies to any needle device that has an unprotected back end needle, including the following conventional and safety-engineered needle devices: multiple sample needles, winged blood collection sets, and luer adapters.

Q. Are there any situations in which it is still acceptable to remove a needle from a blood collection device?

A. According to the OSHA SHIB and OSHA's 2001 Compliance Directive (CPL 2-2.69), there may be situations that necessitate using a syringe to draw blood. The blood collected into the syringe would then need to be transferred into a tube before disposing of the contaminated syringe. In these situations, a syringe with an engineered sharps injury prevention feature, and safe work practices, should be used whenever possible. Transfer of the blood from the syringe to the test tube must be done using a needleless blood transfer device. [The BD Vacutainer® Blood Transfer Device](#) (reference number 364880) can help to satisfy this OSHA requirement.



BD Vacutainer® One Use Holders

Compatible with the entire BD Vacutainer® Venous Blood Collection System



BD Vacutainer® Eclipse™ Blood Collection Needle BD Vacutainer® Safety-Lok™ Blood Collection Set BD Vacutainer® Multiple Sample Luer Adapter

Q. What holder products does BD offer that are intended for single use?

A. The BD Vacutainer® One Use Holder (reference number 364815) is a clear plastic needle holder that is clearly marked with the words “Do Not Reuse” and “Single Use Only.” Once a venipuncture is completed, the entire needle and holder assembly is disposed in a sharps container. The needle *should not* be removed from the holder.

This new needle holder is similar in feel to the standard reusable yellow holder. Thus, no change in venipuncture technique is required when transitioning to a single use holder policy. The One Use Holder will be easy to implement into your venipuncture procedures, as it is compatible with the entire BD Vacutainer® Venous Blood Collection System, including BD Vacutainer® Eclipse™ Needles, BD Vacutainer® Safety-Lok™ Blood Collection Sets, and BD Vacutainer® Multiple Sample Luer Adapters.

Q. Will BD have enough of the One Use Holders when demand for these products increases?

A. Yes. BD is in the process of notifying hospitals, medical suppliers, and other facilities that it has an ample supply of the BD Vacutainer® One Use Holder to meet the changing needs of its customers.

Q. Will there be any other changes to the needle holder products that BD is currently offering?

A. The BD Vacutainer® Standard Yellow Needle Holders (reference numbers 364888 and 364983) are being discontinued and will no longer be available (last order date 1/31/04) as a stand-alone holder for use with blood collection devices. They will still be used as integral components of other safety products, such as the BD Vacutainer® Blood Transfer Device.

Q. What happens if a facility does not comply with OSHA regulations?

A. As with any OSHA rule or regulation, non-compliance may result in the issuance of citations by an OSHA compliance officer after the completion of a site inspection. It is the responsibility of each facility to evaluate their work practices, implement appropriate engineering controls, and institute all other applicable elements of exposure control in order to achieve compliance with current OSHA rules and regulations.

To view the OSHA SHIB in its entirety, visit the OSHA website at <http://www.osha.gov/dts/shib/shib101503.html>.

For more information, or to receive samples of the BD Vacutainer® One Use Holder, please contact your local BD Diagnostics Preanalytical Systems sales representative, or call one of the telephone numbers listed below.

BD, inventor of the BD Vacutainer® Blood Collection System.

BD Global Technical Services: 1.800.631.0174

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