

Updated: 2/28/94

EXPOSURE CONTROL PLAN FOR BLOODBORNE PATHOGENS

I. PURPOSE

This document sets forth the Exposure Control Plan (ECP) of Commerce Public Schools. (Required by paragraph (c) of the occupational health standard for bloodborne pathogens (29 C.F.R. 1910.1930, "the Standard") promulgated by the Occupational Safety and Health Administration ("OSHA"), U.S. Department of Labor.

This ECP identifies the job classifications which have been determined to have potential exposure to blood and other potentially infectious materials (OPIM) at Commerce Public Schools. Other potentially infectious material is defined in the Standard as including the following body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids.

The ECP also describes the methods of compliance with applicable requirements of the Standard, it sets forth a compliance schedule for such methods, and it describes a procedure for evaluating exposure incidents.

All personnel employed by Commerce Public Schools are required to comply with this ECP and with the requirements of the Standard. Any failure to comply may be cause for disciplinary action.

In the event that the requirements of the ECP or the compliance requirements of the Standard should conflict with established infection control procedures, the more protective procedure will be followed to obtain the maximum protection for the injured person and the employee. Questions concerning this ECP and compliance with the Standard should be directed to the Exposure Control Plan Administrator.

II. POSITION RESPONSIBLE FOR OSHA COMPLIANCE

The Exposure Control Plan Administrator has responsibility for implementing the ECP and ensuring compliance with it and the Standard.

III. ACCESSIBILITY OF THE EXPOSURE CONTROL PLAN

This ECP may be examined by employees of Commerce Public Schools during the employee's regular working hours or at such other time as is reasonable.

IV. REVIEW

This ECP will be reviewed and updated by Commerce Public Schools at least annually and whenever necessary to reflect new or modified tasks and procedures which affect employee potential exposure to blood and

other potentially infectious materials, and to reflect new or revised employee potential exposure.

V. EXPOSURE DETERMINATIONS

A. All employees who are directly exposed or where jobs have the likelihood of exposure to blood or other potentially infectious materials. (Fluids that have been recognized by the Centers for Disease Control as directly linked to the transmission of HBV and/or HIV are: blood, blood products, semen, vaginal secretions, cerebrospinal fluids, synovial fluid, pleural fluid, peritoneal fluid, pericardial fluid, amniotic fluid, concentrated HIV and HBV viruses, and saliva in dental setting.)

1. Coaches
2. Elementary Secretary
3. Elementary Principal

B. Some but not all of the employees in the following job classifications are potentially exposed to blood and other potentially infectious materials.

1. Custodial - whose tasks involve contact or handling of regulated waste and cleaning of contaminated work or environmental surfaces.

VI. METHODS OF COMPLIANCE

A. ENGINEERING CONTROLS

Engineering controls are physical or mechanical systems that Commerce Public Schools provides to eliminate hazards at their source.

1. Puncture-resistant sharps containers.
2. Splash guards, goggles, and masks.
3. Disposable gloves and utility gloves.
4. Gowns and aprons.
5. Hazardous waste disposal.

B. WORK PRACTICE CONTROLS

Work practice controls are specific procedures you must follow on the job to reduce your exposure to bloodborne pathogens or other potentially infectious materials.

1. UNIVERSAL PRECAUTIONS

Commerce Public School will observe Universal Precautions throughout the facility to prevent contact with blood or other potentially infectious materials. Under circumstances in which differentiation between body fluid type is difficult or impossible, all body fluids will be considered potentially infectious materials.

2. HANDWASHING

If infectious materials gets on your hands, the sooner you wash it off, the less chance you have of becoming infected. Handwashing keeps you from transferring contamination from your hands to other areas of your body or surfaces you may contact later.

Commerce Public Schools ensures that all employees wash hands using soap, running water, and friction in the following situations.

- A. At the beginning and end of the work shift.
- B. Immediately after or as soon as feasible following contact with blood or other potentially infectious materials, (other skin should be washed with soap and water and mucous membranes flushed with water after contact).
- C. Immediately or as soon as feasible after removal of gloves or other personal protective equipment.

Handwashing facilities are readily accessible to employees in the employees' restrooms.

3. PROCEDURES INVOLVING BLOOD

Procedures involving blood or other potentially infectious materials will be performed in such a manner as to minimize splashing, spraying, spattering and generation of droplets of these substances.

- A. Skin tears or cuts with visible blood will be tended in a manner to reduce the undue spreading of the blood or other potentially infectious materials. (Disposable gloves will be worn when handling any visible blood.)
- B. Oral and mouth care will be provided in a manner not to spatter oral secretions.
- C. When suctioning an injured person, a face guard and gloves should be worn to protect yourself.

4. PERSONAL HYGIENE

- A. Eating, drinking, smoking, applying cosmetics or lip balm, and handling contact lenses are prohibited in work areas where there is reasonable likelihood of potential exposure.
- B. Avoid petroleum based lubricants that may eat through letex gloves. Applying hand cream is alright if you thoroughly wash your hands first.
- C. Food and drink will not be kept in refrigerators, on shelves or in cabinets where blood or other potentially infectious materials are kept.

C. USE OF SHARPS

1. Disposable needles. Only disposable needles will be used at Commerce Public Schools. Contaminated disposable needles will not be bent, recapped or removed, unless absolutely necessary, shearing or breaking of contaminated needles is also prohibited.
- 1B. Recap or remove contaminated needles from disposable syringes only when medically necessary. To recap needles, use a mechanical device or a one handed technique.
2. Disposable sharps. Contaminated sharps, which include any contaminated object that can penetrate the skin such as needles and lancets, will be disposed of immediately or as soon as feasible after use.
3. Contaminated sharps will be disposed of in containers that are closable, puncture resistant, and leak proof on sides and bottom. The container will either be red or affixed with a fluorescent orange or orange-red label and have a biohazard symbol.
4. The disposable sharps containers will be located in the Nurse's Office or Principal's Office.
5. The containers will be maintained upright throughout use, replaced routinely and not allowed to overfill. The containers will be replaced when the container reaches the full line.
6. Full containers will be placed in the biohazardous water materials box in the Janitor's Room.

D. SPECIMENS

Universal precautions will be used in handling all specimens at Commerce Public Schools.

E. PERSONAL PROTECTIVE EQUIPMENT

Equipment that protects you from contact with potentially infectious materials may include gloves, masks, gowns, aprons, lab coats, face shields, goggles, mouthpieces, resuscitation bags or other devices. Under normal work conditions, protective equipment must not allow potentially infectious materials to contact your work clothes, street clothes, undergarments, skin or mucous membranes. The type of protective equipment appropriate for a given task depends on the degree of exposure you anticipate.

1. USE

If your job requires you to be exposed to bloodborne pathogens, or other potentially infectious materials, Commerce Public Schools will provide appropriate personal protective equipment (PPE) to you at no cost. Independent contractors will provide their own equipment.

2. LIMITED EXCEPTION FOR USE OF PPE

Commerce Public Schools will ensure that its employees use appropriate PPE unless an employee temporarily and briefly declines to use it when, under rare and extraordinary circumstances, it was the employee's professional judgement that in this specific instance its use would have prevented the delivery of health care or public safety of the employee or co-employee. As soon as the situation changes, the employee is expected to implement full use of all PPE. The fact that the PPE might alarm an injured person or make routine procedures more difficult is not adequate reason not to use it.

- 2B. In all circumstances when an employee makes a judgement to not use and does not use PPE, Commerce Public Schools will investigate and document the circumstances in order to determine whether changes can be instituted to prevent such occurrences in the future. The Control Plan Administrator, as the facility's individual responsible for OSHA compliance, will perform the investigation, with the assistance of such persons as he/she designates.

3. ACCESSIBILITY

For the Control Plan Administrator and first aid delivery persons, the appropriate PPE will be kept in Janitor's Rooms, Teacher's Rooms, and Gym Equipment Rooms.

For custodians determined to be potentially exposed, appropriate PPE will be kept in the Janitor's Room.

4. GLOVES

- A. Appropriate protective gloves must be worn whenever it is reasonably anticipated that an employee may have hand contact with blood, other potentially infectious materials, mucous membranes, and non-intact skin. They also must be worn whenever performing patient care procedures or when handling or touching contaminated items or surfaces. Disposable sterile gloves should be worn during invasive and aseptic procedures. The following employees will wear gloves during the tasks or procedures listed:
1. Licensed nurses will use sterile gloves when doing catheterization; non-sterile when doing dressing changes, catheter care, treatments, dealing with vomitus, and in situations where there is visible blood.
 2. All personnel administering first aid will use disposable gloves when providing first aid care, and anytime there is visible blood or other potential infected material.

3. Custodians will wear utility gloves during cleaning of areas likely to be contaminated.

4. _____.

B. Disposable (single use) gloves will be replaced as soon as practical when contaminated or as soon as feasible if they are torn, punctured, or when their ability to function as a barrier is compromised. They will not be washed or decontaminated for reuse. Utility gloves may be decontaminated for reuse if the integrity of the glove is not compromised. However, they will be discarded if they are cracked, peeling, torn, punctured or exhibit other signs of deterioration or when their ability to function as a barrier is compromised. After use, disposable gloves and utility gloves which cannot be reused for the reasons stated above, will be placed in the trash for incineration, gloves used during treatments and in cleaning visible blood will be placed in the biohazard box in the Janitor's Room.

5. MASKS

- A. When procedures are performed which generate splashes, spray, spatter or droplets of blood or other potentially infectious materials, such as aspiration or suctioning, and eye, nose, or mouth contamination is reasonable anticipated, face shield may be worn in conjunction with the mask.
- B. Disposable masks will be disposed of after use with each patient. Masks are to be changed whenever soiled with blood or other potentially infectious materials.

F. LAUNDRY

1. Contaminated laundry, anticipated to be soiled with blood or other potentially, infectious materials, will be handled by the employees as little as possible with a minimum of agitation, i.e. the laundry will not be shaken or unfolded. Clothing or linens with visible blood will be bagged at the sight found to prevent leakage and hand carried to the appropriate locations for washing or disposal.
2. Employees handling contaminated laundry will wear gloves and apron when handling those items.
3. The personnel at Commerce Public Schools will wash contaminated laundry according to the recommendations of the Centers for Disease Control, i.e., washed with detergent and water at 160 F for 25 minutes or if lower temperature cycles are used, chemicals at proper concentrations suitable for low temperature washing must be used.

G. HOUSEKEEPING

1. The employees at Commerce Public Schools will clean and decontaminate those work surfaces, environmental surfaces and equipment in areas where there is blood or other possible infectious materials.

2. Housekeepers and nursing personnel will clean and decontaminate all equipment, environmental surfaces, and work surfaces in those areas where there is potential exposure, after actual contact with blood or other potentially infectious materials, using a disinfectant detergent. (The disinfectant is kept in each custodian's closet which is located at each school site.)

H. REGULATED WASTE

1. Regulated waste include items that would release blood or other potentially infectious materials in a liquid or semi-liquid state if compressed; items that are caked with dried blood or other potentially infectious materials and are capable of releasing these materials during handling; and pathological and microbiological wastes containing blood or other potentially infectious materials. If there is the potential for any item such as bandages, gauze, or linens, to be covered with or contain liquid blood or dried blood or other potentially infectious materials, then that item will be handled as regulated waste.
2. For disposal of regulated waste, Commerce Public School provides a container in the Janitor's Room. It is constructed to contain all contents and prevent leakage of fluids, and is colored red and has an affixed biohazard symbol. The container will be closed prior to removal to prevent spillage or protrusion of contents during handling, storage, transport or shipping.
3. If outside contamination of the regulated waste container occurs, it will be placed in a second container with the same characteristics as the first container.
4. Disposal of all regulated wastes will be in accordance with applicable regulations and laws.

I. HEPATITIS B VACCINATION AND POST-EXPOSURE EVALUATION AND FOLLOW-UP.

1. Commerce Public Schools will make available at no cost the Hepatitis B vaccine to all employees who have potential exposure as listed under Exposure Determination. All independent contractors will be responsible for protecting their own employees.
2. Commerce Public Schools will provide post-exposure evaluation and follow-up for any employee who has an exposure incident, defined as specific eye, mouth, or other mucous membrane, non-intact skin, or parental contact with blood or other potentially infectious materials as a result of occupational duties.

3. All medical evaluations and procedures related to the hepatitis B vaccination and post-exposure, an evaluation and follow-up including prophylaxis, that are provided by Commerce Public Schools will be:
 - a. Available at no cost to the employee.
 - b. Performed by or under the supervision of our school nurse.
 - c. Provided according to U.S. Public Health Services recommendations.
 - d. For all laboratory tests to be conducted, Commerce Public Schools will use an accredited laboratory at no cost to the employee. Commerce Public School will also ensure that the laboratory is accredited.

4. HEPATITIS B VACCINATION

- a. Commerce Public Schools will offer the hepatitis B vaccination after the employee has received training as set out below and within the (10) days of initial assignment to a position with potential exposure, unless the employee has previously received the complete hepatitis B vaccination series, antibody testing has revealed that the employee is immune, or the vaccine is contraindicated for medical reasons. At such time the U.S. Public Health Service recommends booster doses. They will be made available.
- b. The vaccine will be provided by County Health Department at the facility or at _____ during working hours.
- c. At the time of the hepatitis B vaccination, a licensed health care professional provided by _____ will be directed to prepare a written opinion concerning whether hepatitis B vaccination is indicated for an employee and whether the employee has received such vaccination. The licensed health care professional will also be directed to provide _____ with a copy of the written opinion within 15 days of the completion of the evaluation, so that _____ can provide the employee with a copy of the written opinion within 15 days of completion of the evaluation as required by the Standard.
- d. If an employee initially declines the vaccination but later while still covered under the Standard decides to accept the vaccination, Commerce Public Schools will make the vaccine available at that time. If an employee chooses not to be vaccinated, he/she must sign the following form required by the Standard:

"I understand that due to my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with hepatitis B vaccine at no charge to myself.

However, I decline hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring hepatitis B, a serious disease. If in the future, I continue to have occupational exposure to blood or other potentially infectious material and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me."

5. POST EXPOSURE-EVALUATION AND FOLLOW-UP

If an employee has an exposure incident, as defined above, he/she should immediately report this event to their immediate supervisor who will notify the administrator who is responsible for OSHA compliance. Commerce Public Schools will immediately make available during working hours or at any time a confidential medical evaluation and follow-up performed by a licensed health care professional, which will include the following:

- a. Documentation of the route of exposure and circumstances under which the exposure incident occurred as set out in the following section.
- b. The blood of the source individual with respect to an exposure incident will be tested if the individual can be identified. Commerce Public Schools will obtain consent from the injured person or their parent or guardian to test their blood for this purpose. If it is impossible to identify the source individual or the source individual does not consent to testing, Commerce Public Schools will document such. If the source individual's infectivity status is found to be positive, blood testing need not be repeated.
- c. The employee of Commerce Public Schools who experiences the exposure incident will be informed by the evaluation licensed health professional of the infectious status for blood borne pathogens of the source individual's blood to the extent that the information provided to him/her about the infectious nature of the source individual may be protected from any disclosure by law and any disclosure made by the licensed health care professional to the exposed employee is to be held confidential. Any breach of confidentiality will expose the employee to disciplinary action including dismissal.
- d. Employees who have experienced an exposure incident will have their blood tested for HBV and HIV serologic status, as soon as possible after the incident, the blood will be tested again in three months and again in six months.
- e. If the source individual is HBV or HIV positive or has refused testing, the employee must be retested if sero-negative at six weeks, 12 weeks, and six months past exposure, as recommended by the U.S. Public Health Service.
- f. It is recommended that anyone with post-exposure be encouraged to seek medical attention for any febrile illness that occurs within 12 weeks of the exposure.

6. DOCUMENTATION OF CIRCUMSTANCES SURROUNDING EXPOSURE INCIDENTS

- a. The medical evaluation and follow-up will include, as set out above, documentation of the circumstances under which the exposure incident occurred. The goal is to identify and correct problems in order to prevent recurrence of similar incidents.
- b. The documentation and investigation of the circumstances surrounding an exposure incident will include at least the following:
 1. Documentation of the time, place and procedure engaged in by the employee at the time of the exposure incident.
 2. Documentation of the personal protective equipment in use at the time of the exposure incident.
 3. Documentation of work practices and any other requirement of the Standard that was or was not being followed at the time of the exposure incident.
 4. An evaluation by the facility's individual responsible for OSHA compliance and the exposed employee of what could have been done to avoid the incident.
 5. Identification of policies or procedures that should be followed or revised to avoid a similar exposure incident in the future.

7. INFORMATION FOR THE LICENSED HEALTH CARE PROFESSIONAL

- A. Commerce Public Schools will provide the licensed health care professional, who is evaluating the employee for hepatitis B vaccinations, with a copy of the current OSHA Standard.
- B. Commerce Public Schools will also provide the licensed health care professional with a description of the exposed employee's duties as they relate to the exposure incident, documentation of the route of exposure and circumstances under which exposure occurred, results of the source individual's blood testing, if available, and all medical records relevant to appropriate treatment including vaccination status which Commerce Public Schools is responsible for maintaining.

J. HAZARD COMMUNICATION

Commerce Public Schools will use red or orange-red bags and the biohazard symbol on all containers or regulated waste.

K. TRAINING

1. All Commerce Public School employees with potential exposure as listed above will be required to participate in a training program at no cost and during working hours. Commerce Public

Schools will provide training at the time of initial assignment to tasks where potential exposure may take place and annually thereafter. Additional training will be provided when tasks or procedures are modified or when new tasks or procedures affect potential exposure.

2. The Commerce Public Schools training program will include at least the following elements:
 - a. A copy of explanation of the OSHA Standard.
 - b. A general explanation of bloodborne diseases.
 - c. An explanation of the modes of transmission of bloodborne diseases.
 - d. An explanation of Commerce Public School's ECP and the way that each employee can obtain a copy of the ECP.
 - e. An explanation of appropriate methods of recognizing tasks and activities that may involve potential exposure.
 - f. An explanation of the use and limitations of methods to prevent or reduce exposure.
 - g. Information on the types, proper use, location, removal, handling, decontamination, and disposal of personal protective equipment.
 - h. An explanation of the basis for selection of personal protective equipment.
 - i. Information on hepatitis B vaccine including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and the vaccine and vaccination will be offered free of charge.
 - j. Information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials.
 - k. An explanation of the procedure to follow if an exposure incident occurs, including how to report the incident and medical follow-up that will be available.
 - l. Information on the post-exposure evaluation and follow-up that will be provided following an exposure incident.
 - m. An explanation of the signs and labels and/or color coding described above.
 - n. An opportunity for interactive questions and answers with the trainer.

3. The _____ will conduct the training program.

L. RECORDS

1. MEDICAL RECORDS:

Commerce Public Schools will maintain medical records for each employee potentially exposed. These records will contain:

- a. The employee's name and social security number.
- b. A copy of the employee's hepatitis B vaccination status, including the dates of all vaccination and any medical records relative to ability to receive the vaccination.

Employees who claim they have been vaccinated and are unable to obtain copies of their vaccination records will be required to submit a statement to the medical record indicating their immune status to HBV.

- c. A copy of all results of examinations, medical testing, and follow-up procedures, including documentation of the circumstances of exposure incident.
- d. A copy of the licensed health care professional's opinion, and
- e. A copy of the information provided to the licensed health care professional. These medical records will be maintained at least for the duration of employment plus 30 years.

2. CONFIDENTIALITY

Commerce Public School will keep all medical records required by the foregoing paragraph that it maintains confidential and they will not be disclosed or reported without the employee's express written consent to any person in or outside the Commerce Public School as required by law.

3. TRAINING RECORDS

Commerce Public Schools will maintain training records which will include:

- a. The dates of training sessions.
- b. The contents or a summary of the sessions.
- c. The names and qualifications of trainers, and
- d. The names and job titles of attendees.

4. AVAILABILITY

Commerce Public Schools will make available upon request to appropriate OSHA officials all records required by this ECP. Medical records will be made available only upon presentation of a proper access order issued pursuant to the requirements of 29 C.F.R. Part 1913 and after notification to the employees of Commerce Public Schools. Employee training records and medical records required by the ECP will be provided to an employee upon request for examination and copying. Medical records will also be available to anyone having written consent of the subject employee.

5. TRANSFER OF RECORDS

If Commerce Public School closes with no successor employer to receive or retain the records, Commerce Public School will notify OSHA at least three months prior to disposal and transmit all records to OSHA if required by OSHA to do so, within the three month period.