

**Bloodborne Pathogen Exposure Control Plan
for
Rib Lake School District**

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Rib Lake School District Bloodborne Pathogen Exposure Control Plan

Introduction

Rib Lake School District is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this goal, the following exposure control plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with OSHA standard 29 *CFR* 1910.1030, "Occupational Exposure to Bloodborne Pathogens."

The ECP is a key document to assist our organization in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP includes:

- Determination of employee exposure
- Implementation of various methods of exposure control, including:
 - Universal precautions
 - Engineering and work practice controls
 - Personal protective equipment
 - Housekeeping
- Hepatitis B vaccination
- Post-exposure evaluation and follow-up
- Communication of hazards to employees and training
- Recordkeeping

Implementation methods for these elements of the standard are discussed in the subsequent pages of this ECP.

Program Administration

- Rib Lake School District Administrator (or his/her designee) is responsible for implementation of the ECP. Rib Lake School nurse will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures and bring to the Safety Committee for approval.
- Those employees who are determined to have occupational exposure to blood or other potentially infectious materials (OPIM) must comply with the procedures and work practices outlined in this ECP.
- The District will provide and maintain all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard. If you need additional supplies, the school nurse should be

contacted to provide additional supplies to ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.

- The District Office designee and/or school nurse will be responsible for ensuring that all medical actions required by the standard are performed and that appropriate employee health and OSHA records are maintained.
- The District Office designee and/or school nurse will be responsible for training, documentation of training, and making the written ECP available to employees. New employees should be trained within 10 working days of their start date with Rib Lake School District.

Employee Exposure Determination

The following is a list of all job classifications in the Rib Lake School District employment in which all employees have occupational exposure:

Job Classification:

Tasks with Occupational Exposure:

School nurse	Provides first-aid to sick and injured students and staff
School building secretaries	Provide first-aid when school nurse is not in the building
Custodians	Clean up blood and body fluid spills on school premises, laundering of blood or OPIM contaminated materials.
Playground supervisors	Care of minor injuries of students on playground
Special education personnel	Care for high-risk students who drool, bite, or incontinent of stool or urine
Head athletic director, coaches and lifeguard	Provide first-aid to an injured athlete

The following is a list of job classifications in which some employees in the District *may have* potential occupational exposure.

Job Classification:

Tasks with Potential for Occupational Exposure:

Bus drivers	May have to clean up blood and body fluid spills when transporting students
Industrial Arts Teacher	Blood contact if student injured in shop area
Physical Education Teachers	Blood contact if student injured during PE

Methods of Implementation and Control

- **Universal Precautions:** All employees will utilize universal precautions. All blood or other potentially contaminated bodily fluids will be considered to be infectious.
- **Exposure Control Plan:** Employees covered by the bloodborne pathogens standard receive an explanation of this ECP during their initial training session. It will also be reviewed in their annual mandatory training. All employees can review this plan at any time during their work shifts by viewing the District website. The plan is also housed in the Safety Plan Binder at the District Office. All new employees will receive a copy of the written plan.

The school nurse is responsible for reviewing and updating the ECP annually, with Safety Committee approval. Upon notification, changes will be made more frequently if necessary to reflect any new or modified tasks and procedures that affect occupational exposure and to reflect new or revised employee positions with occupational exposure. Staff will be inserviced on these changes.

- **Engineering Controls and Work Practices:** Engineering controls and work practice controls will be used to prevent or minimize exposure to bloodborne pathogens. The specific engineering controls and work practice controls used are listed below:
 - **Spill kits** -- Infectious disease spill kits will be examined by custodians and maintained or replaced on a regular schedule to ensure effectiveness.
 - **Gloves and hand sanitizer** are located in the school building offices and school nurse's office. Each school building secretary is responsible to check expiration date on their supplies and notify school nurse if need for replacement due to expiration or product defect.
 - **Travel/first-aid kits** include gloves and hand sanitizer and are available in the school buses. The school nurse monitors these supplies periodically to ensure items are available and not expired.
 - **Sharps disposal containers** are inspected and maintained or replaced by the school nurse when the container has been filled to the designated line on the container or whenever necessary to prevent overfilling. Disposal will be done by the custodial staff.
 - **Needles** -- Contaminated needles and other contaminated sharps will not be bent, recapped, removed, sheared or purposely broken. OSHA allows the exception if a medical procedure would require the contaminated needle be recapped or removed if no other alternative is available and the action is required by the medical procedure. If such action is required then the recapping or removal of the needle must be done by the use of a mechanical device or one-handed technique. Staff will inform school nurse of any need for additional or change in current products that may be needed.
 - **Work Area restrictions** -- In work areas where there is a reasonable likelihood of exposure to blood or other potentially infectious materials,

employees are not to eat, drink, apply cosmetics or lip balm, smoke or handle contact lenses. Food and beverage are not to be kept in refrigerators, freezers, shelves, cabinets or on counter tops where blood or other potentially infectious materials are present. All procedures will be conducted in a manner which will minimize splashing, spraying, splattering, and generation of droplets of blood and other potentially infectious materials.

- **Specimens** of blood or other potentially infectious material will be placed in a container which prevents leakage during collection, handling, processing, storage and transport of specimens. The container used for this purpose will be labeled or color-coded in accordance with the requirements of the OSHA standard. Any container with a specimen will be noted with a biohazard emblem. The container will be leak proof. Appropriate PPE for collection and preparation of specimens will be used.
- **Contaminated equipment** -- Any equipment contaminated with potentially infectious material will be cleansed utilizing appropriate PPE by staff. Staff will use the approved cleanser associated with the equipment for removal of infectious material.
- **Handwashing facilities** are available for employees. If exposure takes place where a handwashing facility is not available, employees are required to use hand sanitizer until they can reach a handwashing facility and wash hands with soap and water.

The District identifies the need for changes in engineering controls and work practices through the Rib Lake School Safety Committee. Employees will be notified of any changes to the plan through staff e-mail.

- **Personal Protective Equipment (PPE):** PPE is provided to employees at no cost to them. Training in the use of the appropriate PPE for specific tasks or procedures is provided by the school nurse. The District has the following PPE available for staff: fluid resistant gowns, goggles, masks, gloves, hand sanitizers, eye wash solution. Staff is responsible for notifying the school nurse for replacement, if equipment is defective, expired or needs to be restocked.

The types of PPE available to employees are as follows:

- **Fluid resistant gowns:** These gowns should be fluid resistant and not allow potential material to seep through to personal clothing. These gowns are yellow in color and available in the school building office or school nurse office. Contaminated gowns will be removed appropriately and placed in proper receptacles.
- **Eye and face protection:** Masks and goggles (some with side shields) are available for staff to be used if potential spraying, splashing, splatter or droplets of blood or other potentially infectious material may be generated and eye, mouth, or nose contamination can be reasonably anticipated.

Employees expected to perform CPR must have appropriate resuscitator devices readily available and accessible.

- **Gloves:** Gloves will be worn where it is reasonably anticipated that employees will have hand contact with blood, other potentially infectious materials, non-intact skin, and mucous membranes, and when handling or touching contaminated items or surfaces. Gloves are to be worn for all fingersticks. Disposable gloves must be latex-free and are not to be washed or decontaminated for re-use and are to be replaced as soon as practical when they become contaminated or as soon as feasible if they are torn, punctured, or when their ability to function as a barrier is compromised. Utility gloves may be decontaminated for re-use provided that the integrity of the gloves is not compromised. Utility gloves will be discarded if they are cracked, peeling, torn, punctured, or exhibits other signs of deterioration or when their ability to function as a barrier is compromised.
- **Hand sanitizer** will be located in the school building offices and school nurse's office. Sanitizer will be monitored for expiration date.
- **Travel/first-aid kits** include gloves and hand sanitizer and are available in the school buses.
- **Sharps disposal containers** are available in each school building office and the school nurse's office.
- **Spill kits** are maintained by the custodial staff.

All employees using PPE must observe the following precautions:

- Wash hands immediately or as soon as feasible after removing gloves or other PPE.
- Remove PPE after it becomes contaminated and before leaving the work area.
- Used contaminated PPE will be disposed of in red biohazard bags.
- Used non-contaminated PPE can be placed in garbage receptacles.
- Never wash or decontaminate disposable gloves for reuse.
- Wear appropriate face and eye protection when splashed, sprays, spatters, or droplets of blood or OPIM pose a hazard to the eye, nose or mouth. In the event any of the areas is exposed, staff will flush these areas with running water if available or as soon as access is available.
- Remove immediately or as soon as feasible any garment contaminated by blood or OPIM, in such a way as to avoid contact with the outer surface.

The procedure for handling used PPE is as follows: Remove the contaminated PPE as demonstrated during training. Dispose of PPE as noted above in the appropriate containers based on if the PPE is/is not contaminated.

- **Housekeeping:** Regulated waste is placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded (see the following section “Labels”), and closed prior to removal to prevent spillage or protrusion of contents during handling.

Contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leak-proof on sides and bottoms, and appropriately labeled or color-coded. Sharps disposal containers are available at (must be easily accessible and as close as feasible to the immediate area where sharps are used). Custodians are responsible to properly dispose of filled sharps containers.

The procedure for handling other regulated waste is: All other contaminated PPE will be placed in the designated biohazard bags. Non-contaminated PPE can be placed in office garbage receptacles.

Broken glassware that may be contaminated is only picked up using mechanical means, such as a brush and dustpan.

Needles that are found on the grounds will require employees to take precautions to avoid exposure to the contaminant. Employees will not pick up the needles with their hands but use some type of tweezers or equipment to dispose of the needle in a puncture resistant container with a biohazard label. If a puncture resistant container is not available with a biohazard label, the needle can be placed in a puncture resistant container and have a biohazard label placed on the container.

Contaminated work surfaces will be decontaminated by the custodial staff, with an appropriate disinfectant after completion of procedures; immediately or as soon as feasible when surfaces are overtly contaminated or after any spill of blood or other potentially infectious materials.

- **Laundry:** Contaminated laundry is handled by custodial staff and will be placed and transported in bags or containers labeled or color-coded. If the contaminated laundry is wet and presents a reasonable likelihood of soak-through or leakage from the bags or container, the laundry will be placed and transported in bags or containers, which prevent soak-through and/or leakage of fluids to the exterior. Employees who have contact with contaminated laundry will wear protective gloves and other appropriate PPE.
- **Labels:** Biohazard labels will be on or placed on any container with contaminated PPE or materials contaminated with OPIM.

Hepatitis B Vaccination

The school nurse will provide training to employees with exposure risk on hepatitis B vaccinations, addressing safety, benefits, efficacy, methods of administration and availability.

The hepatitis B vaccination series (3 injections) is available at no cost after initial employee training and within 10 working days of initial assignment to all employees who are determined to have occupational exposure identified in the Exposure Determination section of this plan. Vaccination is encouraged unless: 1) documentation exists that the employee has previously received the series; 2) employee has had antibody testing revealing that the employee is immune; or 3) medical evaluation shows that vaccination is contraindicated.

However, if an employee declines the vaccination, the employee must sign a declination form. Employees who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the vaccination is kept in the employee's medical file.

If the U.S. Public Health Service recommends a routine booster dose(s) at a future date, such booster dose(s) will be made available.

Vaccination will be provided by the Taylor County Health Department.

Post-Exposure Evaluation and Follow-up

Exposure Incident means a specific eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious materials that results from the performance of an employee's duties.

Should an exposure incident occur, contact your immediate supervisor immediately after the exposure occurs. If the supervisor is not available seek post-exposure evaluation and contact immediate supervisor/acting supervisor within 24 hours of exposure.

An immediately available confidential medical evaluation and follow-up will be conducted by the health care provider of your choice. The health care provider should be knowledgeable about the current management of post-exposure prophylaxis (PEP) for exposed employees. The employee should assure their health care provider has this knowledge and if not should consider an emergency room or infectious medicine provider.

The medical evaluation is recommended to be scheduled within 2 hours of exposure or as soon as possible. Following initial first aid (clean the wound, flush eyes or other mucous membrane, etc.), the following activities will be performed:

- Document the routes of exposure and how the exposure occurred. The *School Exposure Incident Investigation Form* should be completed.
- Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).
- The health care provider will make arrangements to have the source individual tested as soon as possible to determine HIV, HCV, and HBV infectivity.
- If the source individual informs the health care provider, he/she is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.
- The health care provider will, after obtaining consent, collect exposed employee's blood as soon as feasible after exposure incident, and test blood for HBV and HIV serological status.
- If the employee does not give consent for HIV serological testing during collection of blood for baseline testing, the health care provider can determine whether to preserve the baseline blood sample for at least 90 days; if the exposed employee elects to have the baseline sample testing during this waiting period, perform testing as soon as feasible.

Administration of Post-Exposure Evaluation and Follow-up

The District Office and/or school nurse ensures that the health care professional evaluating an employee after an exposure incident receives the following:

- A description of the employee's job duties relevant to the exposure incident
- Route(s) of exposure
- Circumstances of exposure
- If possible, results of the source individual's blood test
- Relevant employee medical records, including vaccination status
- A copy of this Exposure Control Plan

Employees are required to provide the District Office and/or school nurse with a copy of the evaluating healthcare professional's written opinion within 15 days after completion of the evaluation.

The healthcare professional's written opinion regarding hepatitis B vaccination will be limited to whether hepatitis B vaccination is indicated for an employee and if the employee has received such vaccination. This written opinion for post-exposure evaluation and follow-up will be limited to the following information:

- The affected employee has been informed of the results of the evaluation; and has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials that require further evaluation and/or treatment.
- All other findings or diagnoses will remain confidential and will not be included in the written report.

Procedures for Evaluating the Circumstances Surrounding an Exposure Incident

The school nurse and the Rib Lake School Safety Committee will review the circumstances of all exposure incidents to determine:

- Engineering controls in use at the time
- Work practices followed
- A description of the device being used (including type and brand)
- Protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)
- Location of the incident
- Procedure being performed when the incident occurred
- Employee's training

Communication of Hazards to Employees and Training

All employees who have occupational exposure to bloodborne pathogens receive initial and annual training via the Rib Lake School District SafeSchools™ online courses (*Bloodborne Pathogen Exposure Prevention, First Aid and Safety Data Sheets*).

All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

- A copy and explanation of the OSHA bloodborne pathogen standard
- An explanation of our ECP and how to obtain a copy
- An explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
- An explanation of the use and limitations of engineering controls, work practices, and PPE
- An explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE
- An explanation of the basis for PPE selection
- Information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine will be offered free of charge
- Information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM

- An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available
- Information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
- An explanation of the signs and labels and/or color coding required by the standard and used at this District
- An opportunity for interactive questions and answers with the person conducting the training session.

In addition, the school nurse will provide the following information all employees who have occupational exposure:

1. Rib Lake School District Exposure Control Plan
2. Federal Register 1910.1030
3. Hepatitis B vaccine information sheet (VIS)
4. Hepatitis B and C Disease Fact sheets

Recordkeeping

Training Records

Training records are completed for each employee upon completion of training. These documents will be kept for at least three years in the District Office.

The training records include:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of all persons attending/completing the training sessions

Employee training records are provided upon request to the employee or the employee's authorized representative within 15 working days. Such requests should be addressed to the District Office.

Medical Records

Medical records are maintained for each employee with occupational exposure in accordance with 29 *CFR* 1910.1020, "Access to Employee Exposure and Medical Records."

This record will include:

- Each employee's name and social security number
- A copy of each employee's hepatitis B vaccination record or declination form and any additional medical records relative to hepatitis B

- If an exposure incident(s) has occurred, a copy of all results of examinations, medical testing, and follow-up procedures
- If an exposure incident(s) has occurred, the District's copy of the health care professional's written opinion
- If an exposure incident(s) has occurred, the District's copy of information provided to the health care professional: *School Exposure Incident Investigation Form*; the results of the source individual's blood testing, if available; and the consent obtained for release.

The District will ensure that each employee's medical records:

- Are kept confidential and are **not** disclosed or reported without the employee's expressed written consent to any person within or outside of this District, except as required by law. These records are provided upon request of the employee or to anyone having written consent of the employee within 15 working days. Such requests should be sent to the District Office.
- will be kept separate from other personnel records, and will be housed in the school nurse's office.
- will be maintained for the duration of employment plus 30 years.. Records do not have to be maintained if the employee was employed for less than one year and is provided with the record at the time of termination.

OSHA Recordkeeping

An exposure incident is evaluated to determine if the case meets OSHA's Recordkeeping Requirements (29 *CFR* 1904). This determination and the recording activities are done by the District Office and school nurse.

- OSHA-reportable exposure incidents, including splashes to mucous membranes, eyes, or non-intact skin, will be entered as injuries on the OSHA 300 Log.
- This determination and the recording activities are done by the school nurse or designated health care provider and are then forwarded to the person completing the OSHA 300 Log.

A sharps injury log must be maintained in a manner that protects the privacy of employees. At minimum, the log will contain: 1) the location of the incident, 2) brand or type of sharp, and 3) description of incident.

