

Bloodborne Pathogens



EXPOSURE CONTROL PLAN

for



NEWPORT PUBLIC SCHOOLS

Newport Public Schools

December 2010



BLOODBORNE PATHOGENS EXPOSURE CONTROL PLAN (ECP) NEWPORT PUBLIC SCHOOLS

POLICY

The Newport Public Schools 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:
 1. Universal precautions
 2. Engineering and work practice controls
 3. Personal protective equipment
 4. Housekeeping
- Hepatitis B vaccination
- Post-exposure evaluation and follow-up
- Communication of hazards to employees and training
- Recordkeeping
- Procedures for evaluating circumstances surrounding exposure incidents

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

PROGRAM ADMINISTRATION

- The Director of Human Resources is responsible for implementation of the ECP. The Director will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. Contact location/phone number: Newport Public Schools, Office of Human Resources, 15 Wickham Road, Newport, Rhode Island 02840, 401-847-2100.
- 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 Director of Property Services 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. The Director will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes. Contact location/phone number: Newport Public Schools, Office of Property Services, 15 Wickham Road, Newport, Rhode Island 02840, 401-847-2100.
- The Director of Human Resources 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. Contact location/phone number: Newport Public Schools, Office of Human Resources, 15 Wickham Road, Newport, Rhode Island 02840, 401-847-2100.
- The Director of Human Resources will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives. Contact location/phone number: Newport Public Schools, Office of Human Resources, 15 Wickham Road, Newport, Rhode Island 02840, 401-847-2100.



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EMPLOYEE EXPOSURE DETERMINATION

The following is a list of job classifications in which some employees at our establishment have occupational exposure. Included is a list of tasks and procedures, or groups of closely related tasks and procedures, in which occupational exposure may occur for these individuals:

Example:

<i>Job Title-Department</i>	<i>Location</i>	<i>Procedure</i>
Principals	All schools within the district	Student care & hygiene
School Nurses	All schools within the district	Student care & hygiene
Secretaries & Clerks	All schools within the district	Student care & hygiene
Sp Ed Teachers & Para Eds	All schools within the district	Student care & hygiene
Occupational & Physical Therapists	All schools within the district	Student care & hygiene
Plant Engineers & Custodians	All schools within the district	Custodial Services

NOTE: Part-time, temporary, contract and per diem employees are covered by the bloodborne pathogens standard. The ECP should describe how the standard will be met for these employees.

METHODS OF IMPLEMENTATION AND CONTROL

Universal Precautions

All employees will utilize universal precautions.

Exposure Control Plan

Employees covered by the bloodborne pathogens standard receive an explanation of this ECP upon hire, as well as an explanation during their initial training session. It will also be reviewed in their annual refresher training. All employees can review this plan at any time during their work shifts by contacting the Director of Human Resources. If requested, we will provide an employee with a copy of the ECP free of charge and within 15 days of the request.

The Director of Human Resources is responsible for reviewing and updating the ECP annually or 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.

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:

- Sharps containers at each school in the nurse's office
- Red trash containers
- Red trash bags

Sharps disposal containers are inspected and maintained or replaced by the Director of Property Services every year or whenever necessary to prevent overfilling. A mail-back system will be used on an annual basis.

This facility identifies the need for changes in engineering controls and work practices through review of OSHA records, review of Workers' Compensation claims, and employee input.

We evaluate new procedures and new products regularly by literature review, Web research, contact with other schools and agencies, and supplier information.



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Both front-line workers and management officials are involved in this process. The process involves combined input from both front-line workers and management officials.

The Director of Property Services and the Director of Human Resources are responsible for ensuring that these recommendations are implemented if appropriate.

Personal Protective Equipment (PPE)

PPE is provided to our employees at no cost to them. Training in the use of the appropriate PPE for specific tasks or procedures is provided by THE SCHOOL NURSES AND Director of Property Services..

The types of PPE available to employees are as follows: gloves, masks, eye protection, and ear plugs.

PPE is located throughout the district at each school site and may be obtained through the Director of Property Services. At each site, PPE is kept and obtained at the nurse's or plant engineer's/custodian's office..

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 PPE may be disposed of in the regular trash cans or the red trash can if PPE was in contact with a consequential amount of body fluids.
- Wear appropriate gloves when it is reasonably anticipated that there may be hand contact with blood or OPIM, and when handling or touching contaminated items or surfaces; replace gloves if torn, punctured or contaminated, or if their ability to function as a barrier is compromised.
- Utility gloves may be decontaminated for reuse if their integrity is not compromised; discard utility gloves if they show signs of cracking, peeling, tearing, puncturing, or deterioration.
- Never wash or decontaminate disposable gloves for reuse.
- Wear appropriate face and eye protection when splashes, sprays, spatters, or droplets of blood or OPIM pose a hazard to the eye, nose, or mouth.
- 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 reviewed by the school nurses' in their annual reviews.

Housekeeping

Regulated waste is placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately color-coded red, and closed prior to removal to prevent spillage or protrusion of contents during handling.

The procedure for handling sharps disposal containers is through a mail-back sharps disposal management program.

The procedure for handling other regulated waste is disposal through color-coded red trash cans and bags.

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. Sharps disposal containers are available at each school site in the nurse's offices.

Bins and pails (e.g., wash or emesis basins) are cleaned and decontaminated as soon as feasible after visible contamination.

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

Laundry - not applicable



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Labels

The following labeling methods are used in this facility: biohazard symbol on sharps containers, red trash cans and bags.

The Director of Property Services is responsible for ensuring that warning labels are affixed or red bags are used as required if regulated waste or contaminated equipment is brought into the facility. Employees are to notify the Director of Property Services if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etcetera, without proper labels.

HEPATITIS B VACCINATION

At the annual reviews, the school nurses will provide training to employees on hepatitis B vaccinations, addressing safety, benefits, efficacy, methods of administration, and availability. Information and availability is also provided to employees upon hire.

The hepatitis B vaccination series is available at no cost after initial employee training and within 10 days of initial assignment to all employees 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) antibody testing reveals 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 at the Human Resources office.

Vaccination will be provided by the Department of Occupational Health at Newport Hospital.

Following the medical evaluation, a copy of the health care professional's written opinion will be obtained and provided to the employee within 15 days of the completion of the evaluation. It will be limited to whether the employee requires the hepatitis vaccine and whether the vaccine was administered.

POST-EXPOSURE EVALUATION AND FOLLOW-UP

Should an exposure incident occur, after initial contact has been made with the school nurse and medical personnel, if needed, contact the Director of Human Resources at 401-847-2100.

An immediately available confidential medical evaluation and follow-up will be conducted by the Department of Occupational Health at Newport Hospital. 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 on the District's Exposure Reporting Form (see attached).
- Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).
- Obtain consent and make arrangements to have the source individual tested as soon as possible to determine HIV, HCV, and HBV infectivity; document that the source individual's test results were conveyed to the employee's health care provider.
- If the source individual is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.
- Assure that the exposed employee is provided with the source individual's test results and with information about applicable disclosure laws and regulations concerning the identity and infectious status of the source individual (e.g., laws protecting confidentiality).



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- 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, preserve the baseline blood sample for at least 90 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.

ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

The Director of Human Resources ensures that health care professional(s) responsible for employee's hepatitis B vaccination and post-exposure evaluation and follow-up are given a copy of OSHA's bloodborne pathogens standard.

The Director of Human Resources 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

Newport Hospital Occupational Health provides the employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

The Director of Human Resources with school nurse-teachers 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

The school nurses will record all percutaneous injuries from contaminated sharps in a Sharps Injury Log (blood and body fluid exposure reporting forms).

If revisions to this ECP are necessary, the Directors of Human Resources will ensure that appropriate changes are made. (Changes may include an evaluation of safer devices, adding employees to the exposure determination list, etc.)

EMPLOYEE TRAINING

All employees who have occupational exposure to bloodborne pathogens receive initial and annual training conducted by the school nurses (Attachment: Job Description for School-Nurse Teacher).

All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology,



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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 facility
 - an opportunity for interactive questions and answers with the person conducting the training session.
- Training materials for this facility are available at each school in the nurse's office.

RECORDKEEPING

Training Records

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

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 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 Human Resources, Newport Public Schools, 15 Wickham Road, Newport, Rhode Island 02840.

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."

The Director of Human Resources is responsible for maintenance of the required medical records. These confidential records are kept at the Administration Building for at least the duration of employment plus 30 years.

Employee medical 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 Human Resources, Newport Public Schools, 15 Wickham Road, Newport, Rhode Island 02840.



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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 Director of Human Resources.

Sharps Injury Log

In addition to the 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in a Sharps Injury Log. All incidences must include at least:

- date of the injury
- type and brand of the device involved
- department or work area where the incident occurred
- explanation of how the incident occurred.

This log is reviewed as part of the annual program evaluation and maintained for at least five years following the end of the calendar year covered. If a copy is requested by anyone, it must have any personal identifiers removed from the report.

HAZARD COMMUNICATION PROGRAM

1. Company Policy

To ensure that information about the dangers of all hazardous chemicals used by Newport Public Schools is known by all affected employees, the following hazardous information program has been established. Under this program, you will be informed of the contents of the OSHA Hazard Communications standard, the hazardous properties of chemicals with which you work, safe handling procedures and measures to take to protect yourself from these chemicals.

This program applies to all work operations in our company where you may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. All work units of this company will participate in the Hazard Communication Program. Copies of the Hazard Communication Program are available in the Property Services office for review by any interested employee.

The Director of Property Services is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.

2. Container Labeling

The Director of Property Services will verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer's name and address. All labels will be the original manufacturer's label. In-house labeling systems will not be used.

3. Material Safety Data Sheets (MSDSs)

The Director of Property Services is responsible for establishing and monitoring the company MSDS program. He/she will ensure that procedures are developed to obtain the necessary MSDSs and will review incoming MSDSs for new or significant health and safety information. He/she will see that any new information is communicated to affected employees. If an MSDS is not received at the time of initial shipment, contact the Director of Property Services. The Director will obtain the MSDSs from the supplier.

Copies of MSDSs for all hazardous chemicals to which employees are exposed or are potentially exposed will be kept in the plant engineers'/custodians' room at each school.

MSDSs will be readily available to all employees during each work shift. If a MSDS is not available, contact the Director Property Services.

Paper copies of the MSDSs will be readily available to employees in each work area.



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When revised MSDSs are received, plant engineers and custodians at each school site will be responsible for keeping current MSDSs on file.

4. Employee Training and Information

The Director of Property Services is responsible for the Hazard Communication Program and will ensure that all program elements are carried out.

Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the hazard communication standard and this plan before starting work. Each new employee will attend a health and safety orientation that includes the following information and training:

- An overview of the OSHA hazard communication standard
- The hazardous chemicals present at his/her work area
- The physical and health risks of the hazardous chemicals
- Symptoms of overexposure
- How to determine the presence or release of hazardous chemicals in the work area
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment
- Steps the company has taken to reduce or prevent exposure to hazardous chemicals
- Procedure to follow if employees are overexposed to hazardous chemicals
- How to read labels and MSDSs to obtain hazard information
- Location of the MSDS file and written Hazard Communication program

Prior to introducing a new chemical hazard into any section of this company, each employee in that section will be given information and training as outlined above for the new chemical hazard. The training format will be provided annually at each school site through staff review, video and handouts.

5. Hazardous Non-routine Tasks – Not applicable. Licensed contractors are specifically hired for non-routine tasks, i.e., asbestos removal, radon mitigation.

6. Informing Other Employers/Contractors – Not applicable. Licensed contractors are specifically hired for non-routine tasks, i.e., asbestos removal, radon mitigation.

7. List of hazardous Chemicals – Not applicable.

8. Chemicals in Unlabeled Pipes – Not applicable.

9. Program Availability – A copy of this program will be made available, upon request, to employees and their representatives.

Attachments:

1. Hepatitis B Vaccine Declination Form
2. Blood & Body Fluid Exposure Reporting Form

References:

<http://www.osha.gov>

1. Bloodborne Pathogens-1910.1030
2. Hazardous Communication – 1910.1200

<http://www.neahin.org/resources/Images/2010%20Redbook.pdf>

The Red Book Exposure to Blood & Bodily Fluids on the Job: What School Employees Need to Know



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HEPATITIS B VACCINE DECLINATION (MANDATORY)

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 materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Signed: (*Employee Name*) _____ Date: _____



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**NEWPORT PUBLIC SCHOOLS
NEWPORT, RHODE ISLAND**

POSITION: School Nurse/Teacher

GENERAL DUTIES: To provide nursing services and health education to students in assigned schools and to create a climate of health and well being.

REPORTS TO: Director of Special Education and building principals.

QUALIFICATIONS:

1. Hold or be currently eligible for Rhode Island License and Rhode Island Certification as School Nurse/Teacher.
2. Evidence of competence in the field of nursing as demonstrated by academic record and letters of reference.
3. Demonstrated ability to perform the responsibilities below as evidenced by course work, educational experience, and the interview process.

RESPONSIBILITIES:

1. Is available daily for care and consultation in matters of health and safety.
2. Administers first aid in accordance with established first aid procedures.
3. Helps determine the extent of emergency care such as contacting parents or calling an emergency vehicle, according to policies set down by the school department.
4. Implement policy on exclusion and re-admission of students in connection with infectious and contagious diseases.
5. In consultation with the school physician, help determine the necessity of taking medication during school hours and the procedure used.
6. Evaluates the health needs of particular students referred by principals and teachers.
7. Conducts school programs involving physical examinations, and vision/hearing screening in accordance with state regulations.
8. Checks medical records to ensure that all students have the required immunizations.
9. Maintains up-to-date cumulative health records on all students utilizing the SchoolMax Health Module database.
10. Reports to parents, school personnel, physicians, clinics, and other agencies on student health matters, as needed.
11. Participates in work of health curriculum committee and inservice training programs.
12. Acts as consultant and resource person to classroom teacher in evaluating health education material.
13. Instructs health, family life issues, and substance abuse classes when appropriate.
14. Cooperates with school personnel and students in maintaining a safe, clean and healthful school and community.
15. All other related responsibilities as assigned by the superintendent and his/her designee



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BLOOD AND BODY FLUID EXPOSURE REPORTING FORM

Name of Exposed Worker: _____

Social Security #: Date/Time of Incident: _____

Employer: _____

Supervisor: _____

Employee's Job Duties at Time of Exposure: _____

Employee's Home Phone: _____ Employee's Work Phone: _____

Exposure Route: Needlestick Skin Injury Bite Eye Mouth/Mouth Other

Type of Exposure: Blood Sputum Saliva Feces Urine Other

Description of Exposure: _____

Have you received Hepatitis B Vaccine? _____ Date of Last Tetanus Booster: _____

Were you wearing personal protective equipment? _____ Describe: _____

Did you seek medical attention? _____ When? _____

Where? _____

Are you now pregnant? _____

Do you have liver, kidney or hematologic disease? _____

Source patient's Name/ID #: _____

Known Risk Factors:

- Homosexual _____
- IV Drug user _____
- Hemophilia _____
- Dialysis Patient _____
- Sexual Contact of Above _____

Hepatitis B or C status, if known: _____ HIV status, if known: _____

Signature of Exposed Worker _____

Signature of Supervisor _____



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Exposure Information

Steps to Follow in the Event of an Employee Exposure to Blood/Body Fluids

Human Body Fluids are:

- Blood
- 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
- All body fluids in situations where it is difficult or impossible to differentiate body fluids

Unprotected Exposures Include:

1. Puncture wounds and/or laceration with a contaminated needle, knife blade, suturing material, blood tubes, etcetera;
2. Blood or body fluid on an open wound, fresh abrasion or eczematous lesion;
3. Blood or body fluid splashed into mouth or eyes;
4. Mouth-to-mouth resuscitation;
5. Bite injury which breaks the skin.

Emergency First Aid Procedures:

- Bleed” the site;
- Clean the wound with soap and water;
- Apply antiseptic to the area;
- If mucous membrane areas are involved (mouth or eyes), flush with water for at least three (3) minutes.

Reporting Procedure:

- ***IMMEDIATELY*** report this incident to your supervisor;
- Begin an Accident Reporting and Treatment Form;
- Report immediately to the School Nurses’ Office with your Accident and Treatment Form.