

Lewis Center for Educational Research

BP 4119.42 PERSONNEL BLOODBORNE PATHOGENS EXPOSURE CONTROL PLAN

Adopted: June 5, 2003

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Exposure Determination

CAL-OSHA requires employers to perform an exposure determination concerning which employees may incur occupational exposure to blood or other potentially infectious materials. The exposure determination is made without regard to the use of personal protective equipment (i.e. employees are considered to be exposed even if they wear personal protective equipment). This exposure determination is required to list all job classifications in which all employees may be expected to incur such occupational exposure, regardless of frequency. At the LCER the following job classifications are in this category:

Special Education Teachers and Aides

School Secretaries

Proctors

Athletic Trainers

Campus Security Assistants

Schools Administrators

In addition, CAL-OSHA requires a listing of job classifications in which some employees may have occupational exposure. Since not all of the employees in these categories would be expected to incur exposure to blood or other potentially infectious materials, tasks or procedures that would cause these employees to have occupational exposure are also required to be listed in order to clearly understand which employees in these categories are considered to have occupational exposure. The classifications and associated tasks for these categories are as follows:

Job Classification Tasks/Procedures

Custodians Contact with body fluid products

P.E. teachers/Coaches First aid to injured students

Implementation Schedule and Methodology

CAL-OSHA also requires that this plan include a schedule and method of implementation for the various requirements of the standard. The following complies with this requirement:

Compliance Methods

Universal precautions will be observed at LCER facilities in order to prevent contact with blood or other potentially infectious materials. All blood or other potentially infectious material will be considered infectious regardless of the perceived status of the source individual.

Engineering and work practice controls will be utilized to eliminate or minimize exposure to employees at the LCER facilities. Where occupational exposure remains after institution of these controls, personal protective equipment shall also be utilized. The following engineering controls will be utilized:

Latex gloves

Decontamination Spray (Bleach)

Custodial Clean-up Equipment: Brooms, dustpans, appropriate waste disposal, disinfectants, running water, soap

Disinfectant Spray (available in classrooms)

Soap/running water

The above controls will be examined and maintained on a regular schedule. The schedule for reviewing the effectiveness of the controls is as follows:

Latex gloves to be maintained by school offices under supervision of the CEO or designee.

Other listed controls will be maintained by custodial staff on a weekly basis.

Hand washing facilities are also available to the employees who incur exposure to blood or other potentially infectious materials. CAL-OSHA requires that these facilities be readily accessible after incurring exposure. Within the LCER, hand washing facilities are located: lunchrooms (staff), restrooms, most classrooms, and offices. If not available, the LCER will supply disinfectant towelettes.

After removal of personal protective gloves, employees shall wash hands and any other potentially contaminated skin area immediately or as soon as feasible with soap and water.

If employees incur exposure to their skin or mucous membranes, then those areas shall be washed or flushed with water as appropriate as soon as feasible following contact.

Personal Protective Equipment

All personal protective equipment used within the LCER will be provided without cost to employees. Personal protective equipment will be chosen based on the anticipated exposure to blood or other potentially infectious materials. The protective equipment will be considered appropriate if it does not permit blood or other potentially infectious materials to pass through or reach the employees' clothing, skin, eyes, mouth, or other mucous membranes under normal conditions of use and for the duration of time which the protective equipment will be used.

Protective clothing will be provided to employees in the following manner:

Personal Protective Equipment Task

Gloves - Disposable Available in offices, custodial rooms, on buses, in emergency first aid backpacks.

Utility Gloves Custodians

All personal equipment will be cleaned, laundered, and disposed of by the employer at no cost to employees. All repairs and replacements will be made by the employer at no cost to employees.

All garments which are penetrated by blood shall be removed immediately or as soon as feasible. All personal protective equipment will be removed prior to leaving the work area. The following protocol has been developed to facilitate leaving the equipment at the work area:

All personal protective equipment will be placed in a site-specific designated location.

Custodians will place personal protective equipment in the custodial closets.

Gloves shall be worn where it is reasonable anticipated that employees will have hand contact with blood, other potentially infectious materials, non-intact skin, and mucous membranes.

Gloves will be available from the LCER

Gloves will be used for the following procedures: Cleaning bloody wounds, cleaning up body fluid spills and handling soiled clothing.

Disposable gloves used by the LCER employees 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 glove is not compromised. Utility gloves 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.

The CAL-OSHA standard also requires appropriate protective clothing to be used, such as lab coats, gowns, aprons, clinic jackets, or similar outer garments. The following situation requires that such protective clothing be utilized:

Disposable aprons: To be used in case of serious blood loss.

Any LCER facility will be cleaned and decontaminated according to the following schedule:

Upon notification of the principal, or the administrator in charge, the facility will be cleaned and decontaminated immediately in addition to regularly scheduled cleaning.

Decontamination will be accomplished by utilizing the following materials: 1:10 bleach solution and/or E.P.A. registered germicide.

All bins, pails, cans, and similar receptacles shall be inspected and decontaminated on a regularly scheduled basis (weekly by site custodian or LCER maintenance staff).

Regulated Waste Disposal

Hepatitis B Vaccine

All employees who have been identified as having exposure to blood or other potentially infectious materials will be offered the Hepatitis B vaccine, at no cost to the employee. The vaccine will be offered within ten working days of their initial assignment to work involving the potential for occupational exposure to blood or other potentially infectious materials unless the employee has previously had the vaccine or who wishes to submit to antibody testing which shows the employee to have sufficient immunity.

Employees who decline the Hepatitis B vaccine will sign a waiver which uses the specified CAL-OSHA wording.

Employees who initially decline the vaccine but who later wish to have it may then have the vaccine provided at no cost.

The Human Resources office will assure that the vaccine is offered to named employees. Vaccines be administered by qualified health care professional.

Post-Exposure Evaluation and Follow-Up

When the employee incurs an exposure incident, it should be reported to Human Resources.

All employees who incur an exposure incident will be offered post-exposure evaluation and follow-up in accordance with the OSHA standard.

This follow-up will include the following:

1. Documentation of the route of exposure and the circumstances related to the incident.
2. If possible, the identification of the source individual and, if possible, the status of the source individual. The blood of the source individual will be tested (after consent is obtained) for HIV/HBV infectivity.
3. Results of testing of the source individual will be made available to the exposed employee with the exposed employee informed about the applicable laws and regulations concerning disclosure of the identity and infectivity of the source individual.

Follow-up will be conducted by the County Health Department and will include staff and students. Parents/guardians will be notified in the event of blood-to-blood contact.

1. The employee will be offered the option of having their blood collected for testing of the employees HIV/HBV serological status. The blood sample will be preserved for up to 90 days to allow the employee to decide if the blood should be tested for HIV serological status. However, if the employee decides prior to that time that testing will or will not be conducted then the appropriate action can be taken and the blood sample discarded.
2. The employee will be offered post exposure prophylaxis in accordance with the current recommendations of the U.S. Public Health Service. These recommendations are currently as follows: Employee referred to the County Health Department.

3. The employee will be given appropriate counseling concerning precautions to take during the period after the exposure incident. The employee will also be given information on what potential illnesses to be alert for and to report and related experience to appropriate personnel.

4. Human Resources has been designed to assure that the policy outlined here is effectively carried out as well as to maintain records related to this policy.

Interaction with Health Care Professionals

A written opinion shall be obtained from the health care professional who evaluates employees of this facility. Written opinions will be obtained in the following instances:

1. When the employee is sent to obtain the Hepatitis B vaccine.
2. Whenever the employee is sent to a health care professional following an exposure incident.

Health care professionals shall be instructed to limit their opinions to:

1. Whether the Hepatitis B vaccine is indicated and if the employee has received the vaccine, or for evaluation following an incident.
2. That the employee has been informed of the results of the evaluation, and
3. That the employee has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials. (Note that the written opinion to the employer is not to reference any personal medical information.)

Training

Training for all employees will be conducted prior to initial assignment to tasks where occupational exposure may occur. Training will be conducted in the following manner:

New employees will receive training and information in a pre-employment conference (which will cover items #1-#10). Yearly updates will be provided for permanent staff. Calendar will be developed to include all certificated and classified staff.

Training for employees will include the following and explanation of:

1. The CAL-OSHA standard for Bloodborne Pathogens.
2. Epidemiology and symptomatology of bloodborne diseases.
3. Modes of transmission of bloodborne pathogens.
4. This Exposure Control Plan, (i.e. points of the plan, lines of responsibility, how the plan will be implemented, etc.).
5. Procedures which might cause exposure to blood or other potentially infectious materials at this facility.
6. Control methods which will be used at the facility to control exposure to blood or to other potentially infectious materials.

7. Personal protective equipment available at this facility and who should be contacted concerning.

8. Post Exposure evaluation and follow-up.

9. Signs and labels used at the facility.

10. Hepatitis B vaccine program at the facility.

Recordkeeping

All records required by the CAL-OSHA standard will be maintained by the Personnel Offices.

Dates

All provisions required by the standard will be implemented as mandated by CAL-OSHA.

Training will include:

Video tapes

Written materials

Posters

Demonstrations