

Gloucester County Public Schools
EXPOSURE CONTROL PLAN

Exposure Control Plan (ECP) for Blood borne Pathogens

Purpose

Gloucester County Public Schools is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this endeavor, the following exposure control plan (ECP) is provided to eliminate or minimize occupational exposure to blood borne pathogens in accordance with OSHA standard [29 CFR 1910.1030](#), "Occupational Exposure to Blood borne Pathogens."

The ECP is a key document to assist our school division 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, and
 - Housekeeping
- Hepatitis B vaccination;
- Post-exposure evaluation and follow-up;
- Communication of hazards to employees and training;
- Recordkeeping; and
- Procedures for evaluating circumstances surrounding an exposure incident.

The methods of implementation of these elements of the standard are discussed in the subsequent pages of this ECP.

Administrative Duties

The Environmental Health and Safety Manager is responsible for the implementation of the ECP. The Environmental Health and Safety Manager 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: Central Office, 804-693-7549.

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 supervisor will maintain and provide all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard. The supervisor will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes. Contact location/phone number: Central Office, 804-693-7549.

The Environmental Health and Safety Manager will be responsible for ensuring that all medical actions required are performed and that appropriate employee health and OSHA records are maintained. Contact location/phone number: Central Office, 804-693-7549.

The Environmental Health and Safety Manager will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives. Contact location/phone number: Central Office, 804-693-7549.

Employee Exposure Determination

The following is a list of all job classifications at our establishment in which all employees have occupational exposure:

School Nurses
Designated Athletic Coaches
High School security staff

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:

Special Education Teachers
Special Education Assistants
Special Education Bus Drivers/Assistants
Some Classroom Teachers
Support Service Personnel

Part-time, temporary, contract, and per diem employees are covered by the standard. How the provisions of the standard will be met for these employees is described in this ECP, if applicable.

Methods of Implementation and Control

Universal Precautions

All employees will utilize universal precautions.

Exposure Control Plan

Employees covered by the blood borne pathogens standard receive an explanation of this ECP during their initial training session. It will also be reviewed in their annual refresher training. All employees have an opportunity to review this plan at any time during their work shifts by contacting The Environmental Health and Safety Manager. If requested,

we will provide an employee with a copy of the ECP free of charge and within 15 days of the request.

The Environmental Health and Safety Manager 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.

The review and update of such plans must also:

- Reflect changes in technology that eliminate or reduce exposure to blood borne pathogens; and
- Document annually consideration and implementation of appropriate commercially available and effective safer medical devices designed to eliminate or minimize occupational exposure. The Environmental Health and Safety Manager documents all devices considered.

The following table lists the safest devices the Environmental Health and Safety Manager has identified in our last annual review, which took place May, 2010:

Device:	Methods used to evaluate device:	Decision whether or not to implement:	Justification for decision:
No changes	-----	-----	NA

Environmental Health and Safety Manager solicits input from non-managerial employees responsible for direct patient care in the identification, evaluation, and selection of effective engineering and work practice controls. Only those employees responsible for direct patient care who are potentially exposed to injuries from contaminated sharps need be contacted. Our solicitation method involves the following: conversations with school nurses. Environmental Health and Safety Manager documents all solicitation in the ECP.

The following table lists the engineering and work practice controls identified during solicitation in our last annual review, which took place May, 2010:

Engineering or work practice control: no changes	Employee solicited: School Nurses in May meeting	Decision whether or not to implement: no changes in procedures

Engineering and Work Practice Controls

Engineering and work practice controls will be used to prevent or minimize exposure to blood borne pathogens. The specific engineering controls and work practice controls used are listed below:

- Sharps containers

- Work practices include, but are not limited to:
 - Washing hands immediately or as soon as feasible after removal of gloves or other personal protective equipment;
 - Washing hands and any other skin with soap and water, or flushing mucous membranes with water immediately or as soon as feasible following contact of such body areas with blood or other potentially infectious materials;
 - Not bending, not recapping, and not removing contaminated sharps except where:
 - The employer can demonstrate that no alternative is feasible or that such action is required by a specific medical procedure; and
 - Such bending, recapping, or needle removal is accomplished through the use of a mechanical device or a one-handed technique;
 - Not shearing and not breaking contaminated needles;
 - Immediately or as soon as possible after use, placing contaminated reusable sharps in appropriate containers until properly reprocessed;
 - Not eating, drinking, smoking, applying cosmetics or lip balm, or handling contact lenses in work areas where there is a reasonable likelihood of occupational exposure;
 - Not keeping food or drink in refrigerators, freezers, shelves, cabinets, or on countertops or bench tops where blood or other potentially infectious materials are present;
 - Performing all procedures involving blood or other potentially infectious materials in such a manner as to minimize splashing, spraying, spattering, and generation of droplets of these substances;
 - Placing specimens of blood or other potentially infectious materials in a container which prevents leakage during collection, handling, processing, storage, transport, or shipping;
 - Examining equipment which may become contaminated with blood or other potentially infectious materials prior to servicing or shipping and decontaminating as necessary, unless the employer can demonstrate that decontamination of such equipment or portions of such equipment is not feasible;
 - Using appropriate personal protective equipment except for conditions met under 1910.1030(d)(3)(ii);
 - Properly disposing of contaminating personal protective equipment;
 - Maintaining a clean and sanitary worksite; and
 - Following an appropriate cleaning and decontamination method and schedule

Sharps disposal containers are inspected and maintained or replaced by the School Nurse whenever necessary to prevent overfilling.

This facility identifies the need for changes in engineering control and work practices through: input from affected employees. We evaluate the need for new procedures or new products by: input from affected employees. The following staff members are involved in this process: School Nurses.

The Environmental Health and Safety Manager will ensure effective implementation of these recommendations.

Personal Protective Equipment (PPE)

PPE is provided to our employees at no cost to them. Training is provided by the Environmental Health and Safety Manager in the use of the appropriate PPE for the tasks or procedures employees will perform.

The types of PPE available to employees are as follows: Gloves, eye protection, face shields.

PPE is located in the employee's work area and may be obtained through the supervisor.

All employees using PPE must observe the following precautions:

- Wash hands immediately or as soon as feasible after removal of gloves or other PPE.
- Remove PPE after it becomes contaminated, and before leaving the work area. Used PPE may be disposed of in red bags located in the school clinics.
- Wear appropriate gloves when it can be 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, 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 as follows: Contaminated PPE is to be discarded in a red bag container located in the school clinics or obtained from the Environmental Health and Safety Manager.

Housekeeping

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

The procedure for handling sharps disposal containers is: when full, the container is to be taped securely shut and placed in the red bag container for disposal through a DOT approved vendor. The Environmental Health and Safety Manager will arrange for shipping all bio-hazardous wastes.

The procedure for handling other regulated waste is: all contaminated material will be placed in a red bag, and boxed/shipped in accordance with DOT regulations. The Environmental Health and Safety Manager will arrange for shipping all bio-hazardous wastes.

Contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leak proof on sides and bottoms, and labeled or color-coded appropriately. Sharps disposal containers are available in school clinics.

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

Labels

The following labeling method(s) is used in this facility:

Equipment to be labeled:	Label type (size, color, etc.):
Waste containers for contaminated dressings	red bag lined with biohazard label on container

The school nurse will ensure 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 school nurse or supervisor if they discover regulated waste containers, OPIM, contaminated equipment, etc., without proper labels.

Hepatitis B Vaccination

The school nurse and/or Environmental Health and Safety Manager will provide training to employees on hepatitis B vaccinations, addressing the safety, benefits, efficacy, methods of administration, and availability.

The hepatitis B vaccination series is available at no cost after training and within 10 days of initial assignment to 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 chooses to decline 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 Environmental Health and Safety Manager's office.

Vaccination will be provided by Health Department Nurses at the Health Department.

Following hepatitis B vaccinations, the health care professional's written opinion will be limited to whether the employee requires the hepatitis vaccine, and whether the vaccine was administered.

Post-exposure Evaluation and Follow-Up

An exposure incident is a specific eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious materials resulting from the performance of an employee's duties.

Should an exposure incident occur, contact the school nurse, supervisor, or the Environmental Health and Safety Manager at: the school's main office, the central office (693-5300) or 804-832-1457.

An immediately available confidential medical evaluation and follow-up will be conducted by the school nurse, or Environmental Health and Safety Manager. Following the initial first aid (clean the wound, flush eyes or other mucous membranes, etc.), the following activities will be performed:

- Employees who experience an exposure incident must immediately report their exposure to their immediate supervisor and follow the procedures for Workers' Compensation accident reporting.
- The employee who has an exposure incident will be offered a confidential medical evaluation by a medical provider and follow-up at the employer's expense that will include the following elements:
 - Documentation of the routes of exposure and how the exposure occurred
 - Identification and documentation of the source individual (unless we can establish that identification is infeasible or prohibited by state or local law)
 - Arrangements to have the source individual tested as soon as possible to determine HIV, HCV, and HBV infectivity;
- Documentation 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).

Administration of Post-Exposure Evaluation and Follow-up

The Environmental Health and Safety Manager 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 blood borne pathogens standard .

The school nurse or Environmental Health and Safety Manager ensures that the health care professional evaluating an employee after an exposure incident receives the following:

- A copy of 29 CFR [1910.1030](#),
- 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, and
- Relevant employee medical records, including vaccination status.

The school nurse or Environmental Health and Safety Manager 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 Environmental Health and Safety Manager 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,
- 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, and
- Employee's training.

If it is determined that revisions need to be made, The Environmental Health and Safety Manager will ensure that appropriate changes are made to this ECP. Changes may include: evaluation of procedures used during incident, adding employees to the exposure determination list, additional training, etc..

Employee Training

All employees who have occupational exposure to blood borne pathogens receive training provided by the Environmental Health and Safety Manager. Our instructor(s) has the following qualifications: "Safe Schools" is an approved provider for this training.

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

- An explanation of the standard;
- An explanation of an 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 methods that will prevent or reduce exposure including appropriate engineering controls, work practices, and personal protective equipment;
- 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; and
- An explanation of the signs and labels and/or color coding required by the standard.

Training materials for this facility are available at the "Safe Schools" online training at [SafeSchools](#)

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 an electronic database in the Environmental Health and Safety Manager's 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, or the online source,
- The names and job titles of all persons attending the training sessions and
- The employee's record of successful completion

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 Environmental Health and Safety Manager.

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 Environmental Health and Safety Manager is responsible for maintenance of the required medical records. These confidential records are kept at Central Office, 804-693-7549 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 The Environmental Health and Safety Manager.

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 Environmental Health and Safety Manager.

Sharps Injury Log

The Environmental Health and Safety Manager establishes and maintains a sharps injury log to record percutaneous injuries from contaminated sharps. The information in the sharps injury log is recorded and maintained: separate from the main OSHA log. This protects the confidentiality of the injured employee. The GCPS sharps injury log contains:

- The type and brand of device involved in the incident,
- The department or work area where the exposure incident occurred, and
- An explanation of how the incident occurred.

The GCPS sharps injury log will be maintained for five years post incident.

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 signature*)

Date: _____