



# **Eanes Independent School District**

## **BLOODBORNE PATHOGEN EXPOSURE CONTROL PLAN**

Update: June 2019

In accordance with Health and Safety Code, Chapter 81, Subchapter H and analogous to OSHA Bloodborne Pathogens Standard, the following exposure control plan exists.

The purpose of this plan is to reduce Eanes Independent School District employees' risk of exposure to bloodborne pathogens such as human immunodeficiency virus (HIV) and Hepatitis B virus (HBV) through appropriate prevention and control measures. The Eanes ISD Health Services Department and District Director of Safety and Risk Management are responsible for assisting district staff in implementation of the plan and for reviewing and updating the plan annually. A copy of this plan will be available and posted on the district intranet website for employee use. The Department of Safety and Risk Management is responsible for maintaining the master copy of this plan.

**OSHCON**  
**Occupational Safety and Health Consultation Program**  
**Texas Department of Insurance, Division of Workers' Compensation**



**29 CFR 1910.1030**

# **Bloodborne Pathogen Exposure Control Plan**

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## **Blood borne Pathogen Exposure Control Plan for Eanes ISD**

### **I. OBJECTIVE**

The objective of the Eanes ISD Blood borne Pathogen Exposure Control Plan is to reflect the Occupational Safety and Health Administration's (OSHA) Blood borne Pathogens Standard, 29 CFR 1910.1030, and to eliminate or minimize employee occupational exposure to blood, certain other body fluids, or other potentially infectious materials as defined below:

- A. Blood means human blood, human blood components, and products made from human blood.
- B. Bodily fluids means 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.
- C. Other potentially infectious materials means any unfixed tissue or organ (other than intact skin) from a human (living or dead), and human immunodeficiency virus (HIV)-containing cell or tissue cultures, organ cultures, and HIV- or hepatitis B virus (HBV)-containing culture medium or other solutions; and blood, organs, or other tissues from experimental animals infected with HIV or HBV.

### **II. BACKGROUND**

OSHA requires employers to identify situations and job classifications in which employees may be exposed to blood or other potentially infectious materials, and to provide protection to these employees in the form of engineering controls, personal protective equipment, training, and risk reduction.

### **III. ASSIGNMENT OF RESPONSIBILITY**

#### A. Program Administrator

EISD Director of Safety and Security shall manage the Blood borne Pathogen Exposure Control Plan for Eanes ISD, and maintain all records pertaining to the plan.

#### B. Management

Eanes ISD will provide adequate controls and equipment that, when used properly, will minimize or eliminate risk of occupational exposure to blood or other potentially infectious materials. These shall be provided at no cost to the employees. Eanes ISD management will ensure proper adherence to this plan through periodic audits.

### C. Supervisors

Supervisors shall themselves follow and ensure that their employees are trained in and use proper work practices, universal precautions, the use of personal protective equipment, and proper cleanup and disposal techniques.

### D. Employees

Employees are responsible for employing proper work practices, universal precautions, personal protective equipment and cleanup/disposal techniques as described in this plan. Employees are also responsible for reporting all exposure incidents to EISD Director of Safety and Security immediately or within 72 hours.

### E. Contractors

Contract employees shall be responsible for complying with this plan, and shall be provided the training described herein by their company or the department that contracts them.

## IV. EXPOSURE DETERMINATION

All job classifications and locations in which employees may be expected to incur occupational exposure to blood or other potentially infectious materials, based on the nature of the job or collateral duties, regardless of frequency, shall be identified and evaluated by the Eanes ISD Director of Safety and Security. This list shall be updated as job classifications or work situations change. Exposure determination shall be made without regard to the use of personal protective equipment (**employees are considered to be exposed even if they wear personal protective equipment**).

### A. Category I

Job classifications in which employees are exposed to blood or other potentially infectious materials on a regular basis, and in which such exposures are considered normal course of work, fall into Category I (see Appendix A).

- Health Service Personnel
- Coaches and Athletic Trainers
- Special Education Teachers and Special Education Teacher Aides
- Physical Education Teachers
- Custodians

- Plumbers
- Special Education Bus Drivers
- Child Development Center Workers
- Security

#### B. Category II

Job classifications in which employees may have an occasional exposure to blood or other potentially infectious materials, and in which such exposures occur only during certain tasks or procedures that are collateral to the normal job duties, fall into Category II (see Appendix B).

- Regular Education Teachers
- Teacher Aides
- Regular Bus Drivers
- Maintenance Workers

These lists shall be updated as job classifications or work situations change.

#### C. Other:

The following is a list of tasks and procedures in which other district employees may experience occupational exposure:

- Breaking up fights
- Assisting with nose bleeds
- Cleaning up bloody wastes
- Diapering or cleaning human waste
- Receiving bites that break the skin
- Rendering first aid or other instances involving blood or other potential infectious materials

## V. IMPLEMENTATION SCHEDULE AND METHODOLOGY

### A. Compliance Methods

#### 1. Universal precautions

Universal precautions shall be used at Eanes ISD to prevent contact with blood or other potentially infectious materials. All blood or other potentially infectious materials shall be considered infectious, regardless of the perceived status of the source individual.

#### 2. Engineering Controls

The engineering and work practice controls used to minimize or eliminate exposure to employees at Eanes ISD is the availability of reusable mail back sharps containers. All reusable sharps containers shall be puncture resistant, labeled with a biohazard label, and leak-proof.

Manifests of hazardous waste disposal from the mail back sharps containers shall be forwarded to the designated environmental compliance person assigned by Eanes ISD.

#### 3. Needles

Except as noted below, contaminated needles and other sharps shall not be bent, recapped, removed, sheared, or purposely broken. Contaminated sharps shall be placed immediately, or as soon as possible, after use into appropriate sharps containers. All disposable sharps containers shall be puncture resistant, labeled with a biohazard label, and leak-proof.

#### 4. Containers for Reusable Sharps

Contaminated sharps that are reusable shall be placed immediately, or as soon as possible, after use into appropriate sharps containers. All reusable sharps containers shall be puncture resistant, labeled with a biohazard label, and leak-proof.

Reusable sharps containers are located as well in every nurse's clinic. The school nurse will be responsible for mailing back full containers in the provided box as needed and to keep a backup container when current container is getting full.

## 5. Sharps Injury Log

A needle stick or sharps injury log (see Appendix C) shall be maintained (for employers that keep records under 29 CFR 1904), and shall include the following information for each incident:

- a. Period of time the log covers;
- b. Date incident is entered on the log;
- c. Date of incident;
- d. Type and brand of device involved;
- e. Department or area of incident; and
- f. Description of incident.

The log shall be retained for five years after the end of the log year.

## 6. Hand Washing Facilities

Hand washing facilities shall be made available and readily accessible to all employees who may incur exposure to blood or other potentially infectious materials. Employees shall wash their hands with soap and running water as soon as feasible.

## 7. Work Area Restrictions

In work areas where there is a reasonable risk of exposure to blood or other potentially infectious materials, employees shall not eat, drink, apply cosmetics or lip balm, smoke, or handle contact lenses. Food and beverages shall not be kept in refrigerators, freezers, shelves, cabinets, or on counter tops or bench tops where blood or other potentially infectious materials may be present.

Mouth pipetting or suctioning of blood or other potentially infectious materials is prohibited.

All processes and procedures shall be conducted in a manner that will minimize splashing, spraying, splattering, and generation of droplets of blood or other potentially infectious materials.

## 8. Contaminated Equipment

EISD Director of Safety and Security shall ensure that equipment that has become contaminated with blood or other potentially infectious materials is examined prior to servicing or shipping. Contaminated equipment shall be decontaminated, unless decontamination is not feasible. Contaminated equipment shall be tagged and labeled as such.

## 9. Personal Protective Equipment (PPE)

### a. PPE Provision

EISD Director of Safety and Security shall ensure that the provisions regarding personal protective equipment described in this plan are met and maintained.

Personal protective equipment shall be chosen based on the anticipated exposure to blood or other potentially infectious materials. Protective equipment shall be considered appropriate only if it does not permit blood or other potentially infectious materials to pass through or reach an employees' clothing, skin, eyes, mouth, or other mucous membranes under normal and proper conditions of use and for the duration of time that the equipment will be used.

A list of personal protective equipment and associated tasks for Eanes ISD can be found in Appendix D of this plan.

### b. PPE Use

EISD Director of Safety and Security and supervisors shall ensure that employees use appropriate PPE. In cases where an employee temporarily and briefly declines to use PPE because, in the employee's professional judgement, its use may prevent delivery of healthcare or pose an increased hazard to the safety of the worker or co-worker, then the supervisor shall investigate and document the situation to determine whether changes can be instituted to prevent such occurrences in the future.

### c. PPE Accessibility

EISD Director of Safety and Security shall ensure that appropriate PPE in the necessary sizes is readily accessible at the work site or is issued at no cost to employees. Hypoallergenic gloves, glove liners, powderless gloves, or other similar alternatives shall be readily accessible to those employees who are allergic to the gloves normally provided.



d. PPE Cleaning, Laundering and Disposal

All PPE shall be cleaned, laundered, and disposed of by Eanes ISD at no cost to the employees. Eanes ISD will also make all necessary repairs and replacements at no cost to employees.

All garments penetrated by blood or other potentially infectious materials shall be removed immediately or as soon as feasible. All PPE shall be removed before leaving the work area.

When PPE is removed, it shall be placed in appropriately designated areas or containers for storage, washing, decontamination, or disposal.

e. Types of PPE

i. Gloves

Disposable gloves are not to be washed or decontaminated for re-use, and are to be replaced as soon as possible when they become contaminated. Gloves that become torn or punctured (or their ability to function as a barrier is otherwise compromised) shall be replaced immediately or as soon as feasible.

Utility gloves may be decontaminated for re-use if the integrity of the glove is uncompromised. Utility gloves shall be disposed of properly if they are cracked; peeling, torn, punctured, or they exhibit other signs of deterioration or inability to function as a barrier without compromise.

ii. Eye and Face Protection

Masks worn in combination with eye protection devices (such as goggles or glasses with solid side shield, or chin-length face shields) are required when the occurrence of splashes, splatters, or droplets of blood or other potentially infectious materials can reasonably be anticipated to contaminate an employee's eye, nose, or mouth. Situations at Eanes ISD where eye and face protection is required include:

- a) Cleaning of blood or other potentially infectious materials
- b) Plumbing or maintenance work involving areas where human waste may be present.

## B. Housekeeping

This facility shall be cleaned and decontaminated regularly and as needed in the event of a gross contamination. Any potentially contaminated glassware shall not be picked up directly with the hands. Reusable sharps that are contaminated with blood or other potentially infectious materials shall not be stored or processed in a manner that requires employees to reach by hand into the containers where sharps are placed.

## C. Regulated Waste Disposal

Disposal of all regulated waste shall be in accordance with applicable federal, state, and local regulations.

### 1. Sharps

Contaminated sharps shall be discarded immediately or as soon as feasible in containers that are closable, puncture resistant, leak proof on sides and bottom, and labeled or color-coded.

During use, containers for contaminated sharps shall remain upright throughout use, shall be easily accessible to employees, and shall be located as close as feasible to the immediate area where sharps are used or can be reasonably anticipated to be found (including laundry areas). School nurses shall replace sharps containers routinely and not allow them to overfill.

When moving sharps containers from the area of use, the containers shall be closed immediately prior to removal or replacement to prevent spillage or protrusion of contents during handling, storage, transport, or shipping. Sharps containers shall be placed in a secondary container if leakage of the primary container is possible. The second container shall be closeable, constructed to contain all contents, and shall prevent leakage during handling, storage, transport, or shipping. The secondary container shall be labeled or color-coded to identify its contents.

Reusable containers shall not be opened, emptied, or cleaned manually or in any other manner that would expose employees to the risk of percutaneous injury.

Effective March 21, 2000, all Texas employers must manage medical waste according to the Texas Commission on Environmental Quality (TCEQ), Texas Administrative Code, Subchapter Y, Medical Waste Management Standards, § 330.1001-330.1010. For information on medical waste, contact TCEQ at [www.tceq.texas.gov](http://www.tceq.texas.gov) or at 512-239-1000)

## 2. Other Regulated Waste

Other regulated waste shall be placed in containers that are closeable, constructed to contain all contents, and will prevent leakage of fluids during handling, storage, transportation, or shipping.

All waste containers shall be labeled or color-coded and closed prior to removal to prevent spillage or protrusion of contents during handling, storage, transport, or shipping.

## D. Laundry

Laundry contaminated with blood or other potentially infectious materials shall be handled as little as possible. Such laundry shall be placed in appropriately marked bags (biohazard labeled or color-coded bags) at the location where it was contaminated. Contaminated laundry shall not be sorted or rinsed in the area of contamination

# **VI. Hepatitis B Vaccines and Post-Exposure Evaluation and Follow Up**

## A. General

Eanes ISD will make the Hepatitis B vaccine and vaccination series available to all employees who have the potential for occupational exposure, as well as post-exposure follow up to employees who have experienced an exposure incident.

The District shall ensure that all medical evaluations and procedures involved in the Hepatitis B vaccine and vaccination series and post-exposure follow up, including prophylaxis are:

1. Made available at no cost to the employee;
2. Made available to the employee at a reasonable time and place;
3. Performed by or under the supervision of a licensed physician or other licensed healthcare professional; and
4. Provided in accordance with the recommendations of the United States Public Health Service.

## B. Hepatitis B Vaccination

Eanes ISD Health Services shall manage the Hepatitis B vaccination program. Eanes ISD School Nurses will provide the service.

1. Category I Employees

The Hepatitis B vaccination shall be made available to an affected Category I employee after he or she has received training in occupational exposure and within 10 working days of initial assignment to job duties that involve exposure. Exceptions to the administration of the Hepatitis B vaccination include situations where an 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.

Participation in a pre-screening program shall not be a prerequisite for an affected employee to receive the Hepatitis B vaccination. If an employee initially declines the Hepatitis B vaccination, but later decides to accept the vaccination and is still covered under the OSHA standard, the vaccination shall then be made available.

All employees who decline the Hepatitis B vaccination shall sign a waiver indicating their refusal (Appendix E), as required by OSHA. If the United States Public Health Service recommends a routine booster dose of Hepatitis B vaccine, this shall also be made available free of charge to affected employees.

## 2. Category II Employees

The Hepatitis B vaccination series shall be made available and administered to Category II employees no later than 24 hours after an exposure incident. Exposure may be considered a work related injury and covered under the District's Workers Comp Program.

All employees who decline the Hepatitis B vaccination shall sign a waiver indicating their refusal (Appendix E).

## C. Post-Exposure Evaluation and Follow Up

All employees must report all exposure incidents to their School Nurse or their immediate supervisor within 72 hours of exposure. EISD Director of Safety and Security shall investigate and document each exposure incident. Following a report of an exposure incident, the exposed employee shall immediately receive a confidential post-exposure evaluation and follow up, to be provided by a School Nurse. The post-exposure evaluation and follow up shall include the following elements, at a minimum:

1. Documentation of the route of exposure, and the circumstances under which the exposure occurred.
2. Identification and documentation of the source individual, unless it can be established that identification is infeasible or prohibited by state or local law.

## **VII. Labels and Signs**

All Eanes staff shall ensure that biohazard labels are affixed to containers of regulated waste, refrigerators, and freezers containing blood or other potentially infectious materials. Labels shall also be affixed to any other containers used to store, transport, or ship blood or other potentially infectious materials.

The labels shall be fluorescent orange or orange-red, and shall include the universal biohazard symbol. Red bags or containers with the universal biohazard symbol may be substituted for labels. However, regulated wastes must be handled in accordance with the rules and regulations of the entity with jurisdiction. Blood products that have been released for transfusion or other clinical use are exempted from these labeling requirements.

## **VIII. Training**

Each Eanes ISD Department shall ensure that training is provided at the time of initial assignment to tasks where occupational exposure to blood or other potentially infectious materials may occur. Training shall be repeated every 12 months, or when there are any changes to tasks or procedures affecting an employee's occupational exposure. Training shall be tailored to the education level and language of the affected employees, and offered during the normal work shift. Training shall be interactive and shall include:

- A. A copy of 29 CFR 1910.1030, OSHA's Bloodborne Pathogen Standard;
- B. A discussion of the epidemiology and symptoms of bloodborne diseases;
- C. An explanation of the modes of transmission of bloodborne pathogens;
- D. An explanation of District's Blood borne Pathogen Exposure Control Plan, and how employees can obtain a copy of the plan;
- E. A description and recognition of tasks that may involve exposure;
- F. An explanation of the use and limitations of the methods employed by Eanes ISD to reduce exposure (such as engineering controls, work practices, and personal protective equipment);
- G. Information about the types, use, location, removal, handling, decontamination, and disposal of personal protective equipment;
- H. An explanation of the basis of selection of personal protective equipment;
- I. Information about the Hepatitis B vaccination (including efficacy, safety, method of administration, and benefits), as well as an explanation that the vaccination will be provided at no charge to the employee;

- J. Instruction 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 procedures to follow if an exposure incident occurs, including the method of reporting and medical follow up;
- L. Information on the post-incident evaluation and follow up required for all exposure incidents; and
- M. An explanation of signs, labels, and color-coding systems.

## **IX. Recordkeeping**

### **A. Medical Records**

EISD Health Services shall maintain medical records as required by 29 CFR 1910.1020. All records shall be kept confidential and shall be retained for at least the duration of employment plus 30 years.

Medical records shall include:

1. Name and social security number of the employee;
2. A copy of the employee's HBV vaccination status, including the dates of vaccination;
3. A copy of all results of examinations, medical testing, and follow-up procedures; and
4. A copy of the information provided to the healthcare professional, including a description of the employee's duties as they relate to an exposure incident, and documentation of the routes and circumstances of an exposure.

### **B. Training Records**

Eanes ISD Human Service shall maintain training records for three years from the date of training.

### **C. Availability of Records**

Whenever an employee (or designated representative) requests access to a record, Eanes ISD shall provide access to said employee's records in a reasonable time, place, and manner in accordance with 29 CFR 1910.1020I. An employee (or designated representative) will only be given access to his or her own records.

#### D. Evaluation and Review

EISD Director of Safety and Security shall review this Blood borne Exposure Control Plan for effectiveness at least annually and as needed to incorporate changes to the standard or changes in the work place.

**Appendix A**

**Category I Job Classification/Expected Exposure List  
Eanes ISD**

(Date)

At <b>Eanes ISD</b> , the following job classifications are expected to incur occupational exposure to blood or other possibly infectious materials:	
<b>Job Classification</b>	<b>Department/Location</b>



**Appendix B**

**Category II Job Classification/Possible Exposure List  
Eanes ISD**

(Date)

At Eanes ISD, the following job classifications may incur occupational exposure to blood or other possibly infectious materials during certain tasks or procedures:		
<b>Job Classification</b>	<b>Task/Procedure</b>	<b>Department/Location</b>
Administrative Staff	Assisting in cleaning up blood spills	
Custodial Staff	Assisting in cleaning up blood spills	
School Nurse/Athletic Trainer	Responding to medical emergency in a non-healthcare environment	

**Appendix C**

**Sharps Injury Log  
Eanes ISD**

For Period Ending: \_\_\_\_\_

<b>Date Entered</b>	<b>Date &amp; Time of Incident</b>	<b>Type &amp; Brand of Device</b>	<b>Department or Work Area Where Incident Occurred</b>	<b>Description of Incident</b>

Retain Until \_\_\_\_\_ (five years after end of log year)

## Appendix D

### Personal Protective Equipment/Task List Eanes ISD

(Date)

Job Classification	Task/Procedure	Type of PPE to be Used	PPE to be Issued By

## Appendix E

### Hepatitis B Vaccine Declination

I understand that, due to my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring the Hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to me. However, I decline the Hepatitis B vaccination at this time.

I understand that by declining this vaccine, I continue to be at risk of acquiring the serious disease Hepatitis B.

If, in the future, I continue to experience occupational exposure to blood or other potentially infectious materials and I wish to be vaccinated with the Hepatitis B vaccine, I can receive the vaccination series at no charge to me.

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Employee Signature

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Date

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EISD Director of Safety and Security Signature

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Date