

TOWN OF ELLINGTON

Policies & Procedures

EXPOSURE CONTROL PLAN

1. PURPOSE

The Town of Ellington is committed to providing a safe and healthy work environment for our staff. The following Exposure Control Plan (ECP) is provided to eliminate or minimize occupational exposure to blood-borne pathogens in accordance with Occupational Safety & Health Administration (OSHA) standard 29 CFR 1910.1030(c), Bloodborne Pathogens.

The ECP is a key document to assist the Town of Ellington 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
- ✓ 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.

2. PROGRAM ADMINISTRATION

Emergency & Risk Management is responsible for the implementation of the ECP. The Emergency & Risk Management Director will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures.

Emergency & Risk Management Contact Location/Phone Number:
55 Main Street, Ellington CT 860-870-3182

Those employees who are determined to have occupational exposure to blood or other potentially infectious materials must comply with the procedures and work practices outlined in this ECP.

Emergency & Risk Management 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. Emergency & Risk Management will ensure that adequate supplies of the equipment are available in the appropriate sizes for all departments, excluding Ellington Volunteer Ambulance, Ellington Center Fire Department and Crystal Lake Fire Department which will be responsible for their own PPE.

Emergency & Risk Management will be responsible for ensuring that all medical actions required are performed and that appropriate employee health and OSHA records are maintained.

The Human Resource Department will be responsible for scheduling training, documentation of training and making the written ECP available to employees, OSHA, and National Institute for Occupational Safety & Health (NIOSH) representatives by posting on the Town website and upon request.

Human Resources Contact Location/Phone Number:
55 Main Street, Ellington CT 860-870-3100

3. DETERMINATION OF EMPLOYEE EXPOSURE

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

| <u>JOB TITLE</u> | <u>DEPARTMENT</u> |
|-------------------------|-------------------------------------|
| Police Officer | Resident State Troopers' Office |
| Emergency Medical Tech | Ellington Volunteer Ambulance Corps |
| Animal Control Officer | Animal Control Office |

The following is a list of job titles in which some employees of the Town may have increased risk of occupational exposure.

| <u>JOB TITLE</u> | <u>DEPARTMENT</u> |
|---|--|
| Custodian | Senior Center Hall Memorial Library Department of Public Works Crystal Lake Fire Department |
| Day Camp Staff Lifeguards Site Supervisors Coaches | Parks and Recreation Facilities |
| Day Care Staff Program Staff | Youth Services |

4. METHODS OF IMPLEMENTATION AND CONTROL

- A. Universal Precautions: All employees will utilize universal precautions.
- B. Exposure Control Plan: All employees 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 viewing it on the Town of Ellington website. If requested, a copy of the ECP will be provided at no cost and within a reasonable amount of time.

Emergency & Risk Management is responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect any new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

C. 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:

- 1) Appropriate PPE in each building
- 2) Sharps disposal containers accessible to each building

Sharps disposal containers are inspected and maintained by the building's Safety Data Manager or replaced by the Department of Public Works whenever necessary to prevent overfilling.

This facility identifies the need for changes in engineering control and work practices through review of OSHA records, Safety and Health Committee evaluations and employee interviews.

We evaluate new procedures or new products regularly by means of the quarterly Safety and Health Committee meetings.

Both front-line workers and management officials are involved in this process as our Safety and Health Committee is made up of all classifications of employees in Town.

The Emergency & Risk Manager will ensure effective implementation of these recommendations.

D. Personal Protective Equipment (PPE): PPE is provided to our employees at no cost to them. Training is provided by the Emergency & Risk Management Office in the use of the appropriate PPE for the tasks or procedures employees will perform.

- 1) The types of PPE available to employees are as follows:
 - a. gloves
 - b. protective masks
 - c. hand sanitizer

PPE is located in each Town building, in the employee first aid cabinet and may be obtained through the Department of Public Works.

- 2) All employees using PPE must observe the following precautions:
 - a. Wash hands immediately or as soon as feasible after removal of gloves or other PPE.
 - b. Remove PPE after it becomes contaminated and before leaving the work area.
 - c. Used PPE may be disposed of in the Red Biohazard Bags.
 - d. Wear appropriate gloves when it can be reasonably anticipated that there may be hand contact with blood or other potentially infectious materials, 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.
 - e. 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.
 - f. Never wash or decontaminate disposable gloves for reuse.
 - g. Wear appropriate face and eye protection when splashes, sprays, spatters, or droplets of blood or other potentially infectious materials pose a hazard to the eye, nose, or mouth.

- h. Remove immediately or as soon as possible any garment contaminated by blood or other potentially infectious materials in such a way as to avoid contact with the outer surface.

The procedure for disposing of used PPE is as follows:

Call EVAC who will contact Stericycle Inc. at 1-866-783-7422. If unsuccessful in reaching EVAC, contact Stericycle directly.

E. Housekeeping

- 1) Regulated waste is placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded (see Labels Section on Page 5), and closed prior to removal to prevent spillage or protrusion of contents during handling.
- 2) The procedure for disposing of sharps disposal containers and regulated waste is:
 - a. Call EVAC who will contact Stericycle Inc. at 1-866-783-7422.
 - b. 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 in each Town building under the employee area sink and are available at the Department of Public Works.
 - c. Bins and pails (e.g., waste or emesis basins) are cleaned and decontaminated as soon as feasible after visible contamination.
 - d. Broken glassware which may be contaminated is picked up using mechanical means, such as a brush and dustpan.
 - e. Laundering will be performed by Swiss Laundry at 860-872-3698

The following laundering requirements must be met:

- Handle contaminated laundry as little as possible, with minimal agitation.
 - Place wet contaminated laundry in leak-proof, labeled or color-coded containers before transport. Use red bags marked with biohazard symbol for this purpose.
 - Wear protective gloves when handling and/or sorting contaminated laundry.
- 3) Labels: The Department of Public Works 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 Department of Public Works if they discover regulated waste containers, refrigerators containing blood or other potentially infectious materials, contaminated equipment, etc. without proper labels.

5. HEPATITIS B VACCINATION

The Human Resources Department will refer employees to contracted employee health facilities who will provide information on hepatitis B vaccinations, addressing the safety, benefits, efficacy, methods of administration and availability.

The hepatitis B vaccination series is available to all employees at no cost upon hire. 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 (see Page 10). 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 employee medical files in Human Resources.

Vaccination will be provided by CorpCare Occupational Health Center at 2800 Tamarack Avenue, South Windsor, CT 06074; 860-647-4796 or Priority Urgent Care, 105 West Road, Suite 5, Ellington, CT 06029, 860-454-0678.

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

6. POST-EXPOSURE EVALUATION AND FOLLOW-UP

Should an exposure incident occur, contact your department head immediately.

An immediately available confidential medical evaluation and follow-up will be conducted by CorpCare Occupational Health Center or Priority Urgent Care.

- A. Following the initial first aid (clean the wound, flush eyes or other mucous membrane, etc.), these activities will be performed:
- 1) Document the routes of exposure and how the exposure occurred.
 - 2) Identify and document the source individual (unless the employer can establish that identification is not feasible or prohibited by state or local law).
 - 3) Obtain consent and arrange 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.
 - 4) If the source individual is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.
 - 5) 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).
 - 6) 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.

7. ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

The Department Head and the exposed employee will ensure 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
- B. Route(s) of exposure
- C. Circumstances of exposure
- D. If possible, results of the source individual's blood test
- E. Relevant employee medical records, including vaccination status

Upon request Human Resources will provide the employee with a copy of the evaluating health care professional's written opinion within a reasonable amount of time after completion of the evaluation.

8. PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

Emergency & Risk Management will review the circumstances of all exposure incidents to determine:

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

Emergency & Risk Management will record all percutaneous injuries from contaminated sharps in the Sharps Injury Log.

If it is determined that revisions need to be made, Emergency & Risk Management will ensure that appropriate changes are made to this ECP. (*Changes may include an evaluation of safer devices, adding employees to the exposure determination list, etc.*)

9. EMPLOYEE TRAINING

All employees receive bloodborne pathogens training scheduled by the Town of Ellington and conducted by Vector Solutions for CIRMA.

All employees receive training on epidemiology, symptoms, and transmission of blood-borne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

- A. Copy and explanation of the standard
- B. Explanation of our ECP and how to obtain a copy
- C. Explanation of methods to recognize tasks and other activities that may involve exposure to blood and other potentially infectious materials, including what constitutes an exposure incident
- D. Explanation of the use and limitations of engineering controls, work practices, and PPE
- E. Explanation of the types, uses, location, removal, handling, decontamination and disposal of PPE
- F. Explanation of the basis for PPE selection
- G. 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

- H. Information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials
- I. 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
- J. Information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
- K. Explanation of the signs and labels and/or color coding required by the standard and used at this facility

Training materials for the Town of Ellington employees are available on the Vector Solutions website.

10. RECORDKEEPING

- A. Training Records: Training records are produced for each employee upon completion of training. These documents will be kept for at least three years in each employee's individual electronic training file in Human Resources. The training records include:
 - 1) Dates of the training sessions
 - 2) Contents or a summary of the training sessions
 - 3) Names and qualifications of persons conducting the training
 - 4) Names and job titles of all persons attending the training session.

Employee training records are provided upon request to the employee or the employee's authorized representative within fifteen (15) working days. Such requests should be addressed to Human Resource Department.

- B. Medical Records: Medical records are maintained for each employee with occupational exposure in accordance with OSHA standard number 29 CFR 1910.1020, "Access to Employee Exposure and Medical Records."

The Human Resources Office is responsible for maintenance of the required medical records. These confidential records are kept in the Town Hall for at least the duration of employment plus 30 years.

Employee medical records are provided upon request by the employee or to anyone having written consent of the employee within fifteen (15) working days. Such requests should be sent to the Human Resources Office.

- C. OSHA Recordkeeping: An exposure incident is evaluated to determine if the case meets OSHA's recordkeeping requirements (OSHA standard number 29 CFR 1904). This determination and the recording activities are done by Human Resources.
- D. Sharps Injury Log: In addition to the OSHA Recordkeeping Requirements under standard number 29 CFR 1904.8 Subpart C, all percutaneous injuries from contaminated sharps are also recorded in the Sharps Injury Log and the OSHA 300 Log. All incidences must include at least:
 - 1) Date of the injury
 - 2) Type and brand of the device involved

- 3) Department or work area where the incident occurred
- 4) Explanation of how the incident occurred

The Sharps Injury Log is maintained by the Emergency & Risk Management Director. The OSHA 300 Log is compiled by Human Resources and reviewed by the Emergency & Risk Management Director and the Safety & Health Committee at least annually as part of the annual evaluation of the safety program and is maintained for at least five years following the end of the calendar year in which the injury occurred. If a copy is requested by anyone, it must have personal identifiers removed from the report.

REVISED: April 2024

TOWN OF ELLINGTON

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.

Printed Name

Signature

Dated: _____

If under 18 years of age, parental consent is required:

Printed Name (Parent)

Signature (Parent)

Dated: _____

Please return your completed form to Human Resources.

EXPOSURE CONTROL PLAN

Acknowledgement Form

I acknowledge that I have received a copy of the Town of Ellington's Exposure Control Plan. I understand that it is my obligation to read the plan and familiarize myself with its contents and to abide and comply with all of the policies and procedures set forth therein. I further understand that the Town has the right to change, delete, add to, suspend, or discontinue any of its policies and procedures at any time without prior notice, and that if the Town so exercises this right and I remain employed thereafter, I will abide by, and comply with, all of the Town's policies and procedures which are then in effect.

Printed Name:

Signature:

Dated: _____

If under 18 years of age, parental acknowledgement is required:

Printed Name (Parent)

Signature (Parent)

Dated: _____

Please return your completed form to Human Resources.