- Each employee will participate in a mandatory training program provided at no cost to the employee.
  - Must complete the Bloodborne Pathogen training session prior to initial employment.
  - Must complete the yearly Bloodborne Pathogen training session throughout employment.
- Training records will be kept for three (3) years from the date when training occurred. Access to training records is allowed by the employee, employee representative, the OSHA Director and Assistant Secretary.

- Establish appropriate procedures for the reporting, evaluation, and follow-up to any and all incidents of exposure;
- Provide for record-keeping of all the above which complies with both Federal and State laws;
- Develop an exposure control plan.

In compliance with OSHA 29 CFR 1910.1030, Flushing Community Schools has established the following written guidelines to insure a standard of practice which will minimize or eliminate potential exposures to blood and other potentially infectious materials.

Exposure Control Plan

- Bloodborne Exposure Incident is defined as follows: First aid provider experiences splash of blood or bloody fluid into the eye, mouth, or nose, or exposure to blood or other potentially infectious material through broken skin, i.e. cut puncture or human bite.
- Exposure Categories
  - Category A: Employees whose designated job assignment includes the rendering of first aid or who have occupational exposure to blood or other potentially infectious material on a regular basis.
    - Building Administrators
    - Elementary Building Secretaries
    - Elementary Teachers
    - Secondary Building Secretaries
    - School Nurses
    - Coaches
    - Lunch/Playground Supervisors
    - Latchkey Workers
    - Bus Drivers
    - Custodians
    - Computer Technicians
    - Psychologist
    - Social Workers
    - Speech/Language Therapists
    - School-Home Coordinators
    - Secondary Teachers of Industrial Arts, Physical Education & Science Labs
    - Pre-school: Coordinator, Teachers & Teacher Assistants
    - Paraprofessionals: Special Education, Kindergarten & Title I
    - Medical Emergency Response Team Members
  - Category B: Employees whose primary job assignment is not the rendering of first aid. Any first aid rendered by such person is rendered only as a collateral duty responding to injuries resulting from workplace incidents.
    - Central Office Administrators
    - Central Office Administrative Secretaries
    - All Substitutes

- Secondary Teachers, except those listed in Category A
- Transportation Supervisor, Secretaries, Mechanics
- Media Secretaries
- Food Service Staff

- Protocol for Category A
  - The district shall make the hepatitis B vaccination series available to all employees who have occupational exposure after the employee(s) have been given information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated. The vaccine and vaccinations shall be offered free of charge.
  - The district shall make the hepatitis B vaccination series available after the informational meeting and within 10 working days of initial assignment to all employees who have occupational exposure unless the 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.
  - The hepatitis B vaccination series shall be made available to the employee at a reasonable time and place, and performed by or under the supervision of a licensed physician or by or under the supervision of another licensed healthcare professional according to the most current recommendations of the U.S. Public Health Service. This district assures that the laboratory tests are then conducted by an accredited laboratory.
  - If an employee initially declines the hepatitis B vaccination series, but at a later date while still covered under the standard, decides to accept the vaccination, this district shall make available the hepatitis B vaccine at that time.
  - This district shall assure that employees who decline to accept the hepatitis B vaccine offered by this district sign a declination statement.
  - If routine booster dose(s) of hepatitis B vaccine is recommended by the U.S. Public Health Service at a future date, such booster dose(s) shall be made available at no charge to the employee.
  - If hepatitis B vaccination does not produce antibodies, the district does not have to offer series of hepatitis B vaccination again.
  - Records regarding HBV vaccinations or declinations are to be kept by the personnel office.
- Protocol for Category B
  - The district shall provide the hepatitis B vaccine or vaccination series to those unvaccinated employees whose primary job assignment is not the rendering of first aid ONLY in the case that they render assistance in any situation involving the presence of blood or OPIM.
  - ALL first aid incidents involving the presence of blood or OPIM shall be reported to your school principal or supervisor.
  - The district's exposure incident investigation form must be used to report first aid incidents involving blood or OPIM. The incident description must include a determination of whether or not, in addition to the presence of blood or other potentially infected materials, an "exposure incident," as defined by the standard, occurred.
  - This determination is necessary in order to ensure that the proper post-exposure evaluation, prophylaxis and follow-up procedures are made available immediately if there has been an exposure incident as defined by the standard.

- The full hepatitis B vaccination series shall be made available as soon as possible, but in no event later than 24 hours, to all unvaccinated first aid providers who have rendered assistance in any situation involving the presence of blood or other potentially infectious materials regardless of whether or not a specific "exposure incident", as defined by standard, has occurred.
- The hepatitis B vaccination record or declination statement shall be completed. All other pertinent conditions shall be followed as written for those persons who receive the pre-exposure hepatitis B vaccine.

Exposure Control Methods (Risk Reduction)

- Universal Precautions: Recognizing that it is impossible to know whether or not a person is infected with a bloodborne pathogen, all employees will assume that blood or other potentially infectious materials from any person are infectious. Adherence to Universal Precautions is required of every employee. Universal Precautions in Flushing Community Schools include the following major elements:
  - Hand Washing: the district shall provide hand washing facilities which are readily accessible to employees, or when provision for hand washing facilities is not feasible, the district shall provide antiseptic towelettes.
  - Employees shall wash hands or any other skin with soap and water, flush mucous membranes with water immediately, or as soon as feasible, following contact of such body areas with blood or other potentially infectious materials.
  - Employees shall wash their hands immediately or as soon as feasible after removal of gloves. When antiseptic hand cleaners or towelettes are used, hands shall be washed with soap and running water as soon as feasible.
- Engineering Controls: Sharps Management (Regulated Waste i.e. X-acto blades, utility blades, blood-sampling device, etc.) - After use, all Sharps are placed in designated containers (puncture resistant, biohazard-labeled, leak-proof) located in each building as designated by building principal. Contaminated needles shall not be bent, recapped, or purposely broken. The custodian shall be notified when Sharps container is ¾ full for disposal. Disposal will be in compliance with Michigan Medical Waste Rules. Biohazard labels will be affixed to Sharps Containers.
- Work Practices
  - Personal Protective Equipment provided by the district as follows:
    - Disposable Gloves are to be used when blood contact is anticipated. Such gloves may not be washed or reused.
    - Utility Gloves are to be used when blood contact is possible (i.e. “snaking” a toilet). Such gloves may not be washed or reused.
    - Protective Eye Cover (goggles) and Disposable Gowns should be used when blood or OPIM contact is anticipated.
  - Trash Handling: All trash is placed in plastic bags, tied at collection point and transported to disposal. Receptacles intended for reuse with a reasonable likelihood for becoming contaminated with blood or OPIM, shall be inspected and decontaminated on a regularly scheduled basis and as soon as feasible upon visible contamination.
- Housekeeping: Flushing Community Schools will assure that the facility is maintained in a clean and satisfactory condition.

- "Blood Spill" Management
  - Put on gloves.
  - Remove organic material with multiple towels.
  - Spray with approved tuberculocidal disinfectant.
  - Wipe surface with paper towels.
  - Discard paper towels and used gloves in red Biohazard labeled bag and dispose of materials keeping in compliance with Michigan Medical Waste Rules.
  - Wash hands with soap or towelettes.

Post Exposure Evaluation and Follow-up

If an employee is involved in an exposure incident in the performance of his/her duties, they shall have a post exposure evaluation and follow-up.

- Immediate steps
  - Administer first aid
  - Complete and return Incident Report form to immediate supervisor before the end of the work day.
  - Call the office of the Associate Superintendent (810-591-1184) within two hours of the incident.
- Medical Evaluation
  - The responsibility for evaluating the employee after an exposure incident is assigned to AMD and Convenient.
  - Employee will provide a copy of the Incident Report to the medical doctor.
  - Healthcare professional written opinion will be provided to the Personnel Office of Flushing Community Schools within fifteen (15) days of the completion of the evaluation. This opinion will include:
    - Hepatitis B vaccine – demonstrated employee immunity, indication vaccine was offered and if vaccine was received/refused.
    - Employee has been informed of results of the evaluations.
    - Employee has been told about any medical condition resulting from exposure to blood or other potentially infectious materials, which require further evaluation or treatment.

Medical Record Keeping

All of the following records required by OSHA Standard will be maintained in the Personnel Office of Flushing Community Schools in a separate record file in a confidential manner.

- Employee's Incident Report.
- Post-exposure evaluations and documents of written opinion to employee by healthcare professional.
- Hepatitis B inoculation records or waiver form.
- Training records.

Threatening Behavior Toward Staff Members

Flushing Community Schools believes that a staff member should be able to work in an environment free of threatening speech or actions. Threating behavior consisting of any words or deeds that intimidate a staff member or cause anxiety concerning his/her physical and/or psychological well-being is strictly forbidden. Any