

BLOODBORNE PATHOGENS EXPOSURE CONTROL PLAN (ECP)

Employees and administration of the school system are aware of daily risks of potential injury to students and staff. Employees defined in Category I & II of this ECP must also be aware of the potential danger of contamination from bloodborne pathogens resulting from injuries. The Occupational Safety and Health Administration (OSHA) has issued a standard, 29 CFR Part 1910.1030, to reduce the risk and protect employees from this threat. This ECP is adopted to meet this standard. The purpose of the ECP is to provide and maintain a safe working environment for all employees by eliminating and/or minimizing occupational exposure to bloodborne pathogens, including but not limited to Hepatitis B Virus (HBV), Hepatitis C Virus (HCV) and Human Immunodeficiency Virus (HIV). It is the responsibility of the school system to provide and maintain appropriate engineering controls and personal protective equipment, and to develop, establish, and promote safe work practices, ongoing training and education for its employees. It is also expected that employees will practice and follow the guidelines set forth by this ECP.

Scope of the ECP

This plan covers all employees who could be “reasonably anticipated”, as a result of the performance of their job duties, to come into contact with blood or other potentially infectious materials. See Category I and II (see page 4). “Good Samaritan” acts, such as assisting a co-worker with a nosebleed, would not be considered an occupational exposure and are considered a non-routine task outside of the normal functioning of daily school activities planned for in this ECP.

Background

The Center for Disease Control (CDC) has recognized the following as linked to the potential transmission of HBV, HIV, and other bloodborne pathogens in the occupational setting, including schools:

- blood/blood products or components
- semen
- vaginal secretions
- amniotic fluid
- saliva (in dentistry)
- any body fluid visibly contaminated with blood
- pleural fluid
- peritoneal fluid
- cerebrospinal fluid
- all body fluids in situations where it may be difficult or impossible to differentiate between body fluids

These substances shall be collectively referred to as blood or “other potentially infectious material” (OPIM) for the remainder of this document.

Bloodborne Pathogens Exposure Control Plan

In accordance with the Occupational Safety and Health Administration (OSHA) regulations dealing with "Safe Workplace" standards (29 CFR 1910.1030) relating to exposure to Bloodborne Pathogens, the following plan and procedures have been developed for all employees. It will be the plan of the school system to take all reasonably necessary actions to protect its employees from infectious disease and in particular HIV and HBV infection. The school system will provide training and protective equipment to those persons who are at risk by carrying out their job tasks and may come in contact with infectious disease. This plan shall be reviewed annually by the school system.

I. Exposure Determination

The school system has assessed job tasks for all employees and determined the following risk categories subject to this ECP:

Category I: Employees who *are likely* to have occupational exposure as part of their normal work routine.

Category II: Employees who *may* have occupational exposure, but not as a part of their normal work routine.

Category III: Employees who *do not* have occupational exposure as part of their normal work routine.

Identified Staff:

Category I: Bus Driver, Coach, School Nutrition staff, School Nurse, Custodians
Physical Ed teachers, Special Ed Teachers, School Secretaries

Category II: Principal, Assistant Principal, Groundskeeper, Maintenance, Teachers

Category III: All other school system employees

II. Hepatitis B Vaccine

All employees defined as Category I & II personnel will be offered the vaccine for Hepatitis B Virus (HBV) which is a life threatening bloodborne pathogen. Informed consent as per standard medical regulations will be used (Attachment). The vaccination will be done at no cost to the employees and is provided as a precaution for personnel safety. If an employee chooses not to receive a HBV vaccine, the employee must sign a letter of declination (Attachment).

III. **Universal Precautions, Engineering Controls and Work Practice Controls**

The following procedures will be followed by all staff listed above, who may have the potential to come in contact with blood and other infectious body fluids.

1. Universal precautions (Attachment) shall be followed by all employees at all times. All blood and bodily fluids shall be considered potentially infectious.
2. Employees are advised to wear gloves when exposed to blood or other bodily fluids including potentially infectious materials such as saliva, sputum, feces, tears, nasal secretions, vomitus and urine.
3. If an employee becomes contaminated, wash the area immediately with soap and water. If running water is not available, employees will be provided an appropriate hand wash substitute, such as an antiseptic foam cleanser or towelettes until an appropriate hand washing facility can be utilized.
4. All waste containers will be lined with a plastic bag. Waste containers in the health offices will be double bagged and emptied each school day by custodians.
5. Plastic needle "red" waste containers will be kept in all nurse's offices. All needle-like contaminated "sharps" and first aid equipment will be deposited in designated containers. Full "sharps" containers will be disposed of properly as medical waste.
6. If clothing should become contaminated with blood or body fluids, it should be doubled bagged and sent home.
7. Contaminated surfaces or areas shall be decontaminated with an appropriate disinfectant immediately after exposure.
8. When a spill occurs, the Building Administrator, or designee, will limit access to areas of potential exposure and notify the custodian immediately.
9. All work tasks will be performed in a manner that will reduce the risk of exposure. Employees in areas where exposure hazards exists are expected to adhere to the following:
 - Eating, drinking, applying lipstick or balm and/or handling contact lenses are prohibited in work areas where there is reasonable anticipated exposure.
 - Food and drink shall not be kept in refrigerators, shelves, cabinets where blood or OPIM are stored or present.

IV. **Personal Protective Equipment**

1. Personal Protective Equipment (PPE), including but not limited to what is identified herein will be provided by the school system:

Required: non-latex/nitrile gloves,

May include: personal protective gowns, protective eye wear and one way valve face mask or CPR masks (in AED kits)

Location(s) of required PPE: buses, custodial closets, nurse offices, classrooms, etc.

2. Training in the use of the appropriate PPE for the tasks or procedures the employee will perform will be provided during initial or annual training events. Record of the training is kept through Vector Solutions Reports.

V. **Training: Exposure Control and ECP**

1. Employees in Category I & II will upon hire be initially trained on the precautions, risks and actions to take if exposure to bloodborne pathogens occurs.
2. Employees identified in Category I & II who perform tasks which have been determined to have a potential for exposure will be provided training annually. Annual refresher training will be a review and may be condensed.
3. Training will be conducted through Vector Solutions, and will include explanation and location of 29 CFR 1910.1030, Bloodborne Pathogens Standard and location of this plan. The Director of Facilities will provide the information.
4. Custodians will be provided detailed cleaning procedures including the appropriate cleaning products to use during annual refresher training for exposure to bloodborne pathogens. This will be provided by the Director of Facilities.
5. Employees will be provided additional training when changes or modifications of tasks have occurred with regards to new procedures, products or equipment.

Training will consist of:

- Explanation of the Bloodborne Pathogens Standard (29 CFR 1910.1030)
- Explanation and location of Exposure Control Plan
- General explanation and definition of bloodborne pathogens
- Modes of transmission
- Explanation of the use and limitations of the methods of controls (universal precautions, work practice controls and PPE)
- Hands-on practice with the use, removal and disposal of selected PPE (i.e. gloves)
- Information on the HBV vaccine, including efficacy, safety and the benefits of being vaccinated
- Explanation of the post-exposure procedures and evaluation
- Opportunity to test employee's knowledge
- Interactive questions and answers

VI. **Records**

Employee records for training will be maintained through the Human Resources Coordinator through Vector Solutions. Hep B shots, declination of Hep B shot, and medical follow-up documents shall be maintained by the Human Resources Coordinator.

VII. **Post-Exposure Procedures and Evaluation**

Employees who come in contact with blood and body fluids in the performance of their job will take the steps necessary to safeguard their health. "Contact" shall be considered as having OPIMs

enter one's body through cuts in the skin or splashes of fluids into eyes, mouth, nose or other mucous membranes. If exposed, employees are trained to:

1. Immediate first aid – Employee will wash the exposure site thoroughly with soap or disinfectant and water. Flush eyes and/or mucous membranes with water immediately.
2. Employees will immediately (within 1 hour) report the injury to the school administrator and their immediate supervisor and complete an Staff Injury/Accident Report- Employee's Incident Report (located on the RSU5 website). When school is not in session, refer a person to their own physician or a healthcare facility (Concentra or Emergency Room) and the employee will report the incident to their supervisor within 24 hours.
3. The Human Resources Coordinator or the supervisor will arrange for a medical post-exposure evaluation and follow-up. This evaluation and follow-up will be provided by the school system at no cost to the employee.
4. The school administrator will complete a Supervisor's Incident Report (located on the RSU5 website) which will include the circumstances under which the incident occurred and documentation of the route of exposure (skin, mucous membrane, etc.) and should be submitted to the Human Resources Coordinator within 24 hours of the accident. Supervisors shall look for ways to prevent future exposure pathways, if any.
5. A Medical Evaluation and Follow-up Report (GBGAA-E2) form will be given to the employee to be completed at the medical facility conducting the post-exposure evaluation and returned to the Human Resources Coordinator.

UNIVERSAL PRECAUTIONS

In order to provide a consistent approach in managing body substances from all students and staff, and reduce the risks of exposure to bloodborne pathogens, the practice of Universal Precautions shall be followed by all employees at all times, regardless of situation. All blood and body fluids shall be considered potentially infectious.

Universal Precautions shall apply to all blood/blood components and body fluids including semen, vaginal secretions, breast milk, amniotic fluid, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, and wound drainage.

Each job classification may be required to formulate and revise as necessary, separate procedures regarding the use of personal protective equipment and development of work practices for the protection of employees. Compliance with Universal Precautions shall be monitored by the School Nurses and building administrators.

1. Hand Washing

Hand washing continues to be an important means of interrupting disease transmission.

- Wash hands often and thoroughly, with soap and water.
- Wash hands after removing gloves or other PPE.
- Wash hands after contact with blood or other potentially infectious material.

- In the event hand washing facilities are not immediately available, a substitute antiseptic hand cleaner or towelette can be used. Hands shall be washed with running water and soap as soon as possible.

2. Gloves

- Gloves shall be worn when there is anticipated or potential contact with blood or body fluids.
- Gloves shall be worn when the employee has non-intact skin (cuts, abrasions, dermatitis, etc.)
- Gloves shall be worn by the person responsible for the transportation of soiled linens, clothing or waste materials containing potentially infectious materials.
- Gloves shall be worn when cleaning any surfaces soiled with blood or body fluids.
- Gloves shall be worn when handling/cleaning rooms and/or areas where there are potentially infectious materials.
- Gloves shall be changed when visibly soiled or damaged.

3. Gowns

- Remove clothing if saturated with blood and place in a double heavy plastic waste bags for proper cleaning. Personal protective gowns are available in the nurse's office if deemed necessary.

4. Needles/Sharps

- Needles shall not routinely be recapped, bent, broken, removed from disposable syringes, or otherwise manipulated by hand.
- Equipment with sharp edges (art supplies, staplers, etc.) shall be properly cleaned if exposed to blood.
- All needles shall be disposed of in puncture-proof containers specifically manufactured for this purpose. These containers shall be located in the Nurse's office in each school under the direction of the school nurse and changed when full.
- Sharps (knife blades, guidewires, etc.) Place the sharp object on a piece of sturdy cardboard and carefully tape the sharp object to the cardboard. Place another piece of cardboard over the taped object and tape the two pieces of cardboard together. Write on both sides of the cardboard –“SHARP OBJECT” – (blade, etc.)

5. Waste

- All waste should be properly packaged to prevent spill or leakage and labeled for disposal by the area generating the waste. Wastes, except “red” sharps containers, shall be doubled bagged in heavy plastic waste bags, tied securely, and then disposed of as household waste.

6. Blood or Body Fluid Spills

- In the event of a blood or body fluid spill, all visible organic matter must first be removed and then the area decontaminated. Broken glassware or sharps shall be picked up using a dustpan and brush, not by hand. Decontamination shall be done by wiping the area of spill with an approved disinfectant or bleach.

7. Resuscitation Equipment (optional)

- Resuscitation devices including pocket masks or ambu bags may or may not be provided (strategically located) to provide personnel with immediate access for emergency situations. These devices shall be used in place of emergency mouth-to-mouth resuscitation. Once used, these items shall be properly bagged for disposal or decontamination and cleaning.

8. Hepatitis B Vaccine Program

- All employees who work in job classifications I & II are likely or may have occupational exposure to blood or body fluids shall be offered the Hepatitis B Vaccine at no cost to the employee. These workers will be vaccinated or if they choose, decline. Any employee who initially declines the vaccine may at any time request the vaccine at a later date.

9. Education

- Employees in Category I & II shall receive training in Universal Precautions, pertinent to their job classification and shall review the Universal Precautions annually through staff development opportunities.

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