OSHA Bloodborne Pathogens Standard

Exposure Control Plan 2017 - 2018

Read and retain these guidelines for future reference

Guidelines For Avoiding Exposure to Body Fluids in a School Setting

Elements of the Exposure Control Plan:
- Understanding and Using of Standard (previously called “Universal”) Precautions
- Knowing what to do after an Exposure Incident
- Risk Assessment of school district positions
- Bloodborne Pathogens Training for employees to be aware of and minimize exposure in their day to day work with students and staff
- The use of Barriers in situations where the risk of exposure exists
- Hand washing before and after working with students and staff in certain situations, even when gloves have been worn
- Safe disposal of potentially infectious materials -> “Medical Waste”
- Hepatitis B Vaccine Program
- Workplace Engineering Practices to maximize safety
- Management of potential Bloodborne Pathogens Exposure Incidents
- Maintenance of “OSHA Records”

KEY CONCEPT -> STANDARD PRECAUTIONS (= UNIVERSAL PRECAUTIONS)
Standard (previously called “Universal”) precautions mean when an individual’s personal medical history is unknown; we assume that all body fluids are potentially infectious and take precautions to avoid personal exposure. Particularly in view of the treatments available for many contagious diseases, individuals who appear healthy may have a contagious condition. THE BODY FLUIDS OF ALL PERSONS SHOULD BE CONSIDERED POTENTIALLY INFECTIONOUS/HAZARDOUS. The risk of infection from different organisms (bacteria and viruses) varies, depending on several factors.

Standard Precautions require the following actions:
- Hand washing before and after contact with students
- Use of disposable gloves when touching blood, body fluids, secretions, excretions, and contaminated items.
- Hand washing after touching blood, body fluids, secretions, excretions, and contaminated items.
- Use gowns and goggles if splashes or sprays of body fluids are likely (this applies mostly to Nurses and Environmental Services staff).
**Body Fluids:**
Body fluids in an occupational setting include, but are not limited to blood, drainage from cuts and scabs, skin lesions, vomitus, and bloody nasal discharge. In the absence of visible blood, saliva, feces, and urine exposure do not require post-exposure follow up. While blood and semen are the major transmitters of infection, in the school setting we are concerned primarily with blood.

It is essential to avoid direct skin contact with body fluids.

**Exposure Incident: What to Do After a Blood or Body Fluid Exposure**
1. Wash with soap and water.
2. Report the injury to your School Nurse who will assist you in evaluating the type of exposure. (Was this a true exposure? What type of exposure?)
3. An employee who has had a true exposure will be referred to a health care practitioner for a clinical evaluation and baseline testing.
4. In cases of a true exposure, the student’s parent will be contacted and a medical assessment of the student will be requested. The School District cannot insist that the parent follow through with the assessment. If the student is assessed, we will ask the parents to share the results of the evaluation/laboratory studies with us.
5. It is essential for employees to report the incident to the School Nurse as soon as possible because early treatment may be recommended by a health care practitioner.

**Risk Assessment**
Fortunately, there has never been a reported case of HIV transmission in a school setting. Hepatitis B virus has similar modes of transmission to HIV, but is a more contagious condition (i.e., it is easier to “catch” from any given potential exposure). Additionally, Hepatitis B virus can live on surfaces for up to one week. Hepatitis C also has similar modes of transmission. It is less transmissible than Hep B, but more transmissible than HIV. Certain jobs involve potential risk. In the Byram Hills School District, we have identified the following staff:

- Health Services Department: School Nurses/Nurse Practitioner/Health Services Coordinator
- Physical Education / Athletics Department: teachers, coaches, trainers
- Special Education Department: staff who work with developmentally, physically, and emotionally disabled students, particularly those without full control of bodily functions and those who exhibit behaviors such as biting. At this time, only Elementary School Special Education Teachers are considered at risk.
- School Facilities, Operations and Maintenance Department: Custodians and buildings and grounds workers
- All staff who are AED/CPR trained and certified
- Selected staff who volunteer for EpiPen® Administration Training
- Art Teachers
- Secondary Education Science teachers
- Transportation Staff
Bloodborne Pathogens Training

Employees who are in positions determined to carry risk for Bloodborne Pathogens Exposure are required to attend annual training sessions conducted by the School Nurse(s) in each building. Employees will receive information about Bloodborne Pathogens and how to avoid exposure.

Employees will receive adequate notice of the date and time of the training session. Each employee is required to sign the attendance sheet.

Employees who are asked to care for students requiring special care will receive training in Infection Control procedures related to the tasks required by the Health Services Coordinator and/or the School Nurses. See Appendix B – Guidelines for Special Situations

Barriers

In medical settings, barriers consist of disposable gloves, masks, goggles and gowns. In the Byram Hills School District, we rely on disposable gloves for protection in most cases. All staff members are required to use disposable gloves when handling body fluids. School facilities, operation and maintenance staff may also use protective clothing. The use of disposable gloves is recommended for caregivers who anticipate assistance in First Aid when body fluids are present (i.e., cleaning cuts and scrapes, helping a student with a bloody nose).

Staff members who handle diapers or student clothing soiled by incontinence need to take similar precautions.

The use of disposable gloves is required for those who clean surfaces soiled by body fluids.

There may be occasions where unanticipated skin contact occurs and gloves may not be immediately available (i.e., wiping a runny nose, administering First Aid to a bleeding wound while away from school building). In these occurrences, hands and all other affected skin areas must be washed with soap and running water as soon as possible.

Handwashing

Handwashing is the single most important strategy for minimizing the spread of infectious diseases from physical contact with people or inanimate surfaces. Effective hand-washing requires the use of liquid (not bar) soap and VIGOROUSLY WASHING UNDER A STREAM OF RUNNING HOT WATER FOR AT LEAST 20 SECONDS, the time it takes to sing “Happy Birthday” twice. Use paper towels to dry hands well. Adequate handwashing facilities have been established in all buildings. [For Handwashing Procedures, see Appendix A.]
**Medical Waste**

All “sharps” and items which are stained with blood and body fluids must be disposed of in special Medical Waste containers (red biohazard bags or sharps boxes). The Director of School Facilities, Operations and Maintenance will have full sharps boxes transported to Northern Westchester Hospital for Disposal. Most of the sharps boxes in the Health Office have been converted to a mail disposal system which is managed by the School Nurses and Health Services Coordinator.

**Hepatitis B Vaccine Program**

Hepatitis B is one of the Bloodborne Pathogens viruses. A safe and effective vaccine is available to protect individuals against becoming infected with Hepatitis B. The Health Services Department offers this vaccine to all newly hired employees in identified risk positions.

Staff members who have declined the vaccine:

a. Must sign a declination statement that they refused the vaccine.

b. May request to be vaccinated in any subsequent school year. This request may be made to the building School Nurse, or by calling Sue Adams, the Health Services Coordinator, at 273-4250 x3997 or e-mail, sadams@byramhills.org

[Note: Currently, there are no available vaccines to protect against HIV or the Hepatitis C virus.]

**Vaccine Administration**

The vaccine series consists of 3 doses of Hepatitis B vaccine given over a six month period. Each employee who elects to be vaccinated will review Informed Consent information and sign the Informed Consent/Vaccine Record form.

Vaccines are administered by a School Nurse or the Health Services Coordinator / Nurse Practitioner after the Nurse Practitioner reviews the employee’s interval health status and orders the vaccine dose.

**Vaccine Records**

Each employee who completes the vaccine series receives a written copy of his/her vaccine record. Employees are encouraged to submit a copy of the record to their personal physician. The record is kept on file in the Health Services Coordinator’s office for the duration of the staff member’s employment + 30 years, as per OSHA regulations. Any vaccinated employee who requires information about his/her vaccine record can request it from the Health Services Coordinator. Employees who have had the Hepatitis B vaccine series through a personal physician or another employer are encouraged to submit the record to the Health Services Coordinator for their OSHA file.

**Workplace Engineering Practices**

As new products and procedures become available, the Byram Hills School District will
incorporate them into our practices to improve safety and protect the health of our employees. Employees who become aware of such measures should bring them to the attention of their supervisor for consideration.

**Safety needles**

Safety needles are used to administer Hepatitis B vaccines. As safety needle devices become available for EpiPens®, Glucagon, or insulin administration, the District will ask parents to convert to the new product. Most students have the new EpiPen® with the retractable needle at this point.

**Spills**

If a student or staff member who is exposed to a significant blood or body fluid secretion spill must report to the School Nurse. The spill is to be cleaned only by the custodian. Gloves are available to staff who need them from the School Nurse.

**Bloodborne Pathogens Exposure Incidents**

Report a potential Bloodborne Pathogens Exposure Incident to the School Nurse promptly. The School Nurse will consult with the Nurse Practitioner and/or the School Physician. If it is determined that the incident meets the criteria for a true exposure, the employee will be advised to consult his/her private physician for urgent medical attention.

The School Nurse and Health Services Coordinator will assist the employee in obtaining pertinent medical information from the student(s) involved in the incident. It is our practice to request an outside medical evaluation, including HIV and Hepatitis B titers (antibody levels), on all students involved in such incidents, but the School District cannot require the parent/guardian to have their child undergo this testing.

It is also part of our routine to request that the results of any testing be released to the employee, the School Nurse, Nurse Practitioner / Health Services Coordinator, and School Physician. The Health Services Coordinator will assist the employee and work with the outside physician to the best of our ability.

**Needle Stick Injury/Needle Stick Log**

Any staff member who sustains a needle stick injury will report this injury to the Health Services Coordinator on the day of the injury. The employee will be referred for urgent medical care on that day.

The Health Services Coordinator will maintain a log of needle stick injuries. (See Attached OSHA Log 300)

**EpiPen® Administration**

In accordance with NYSDOH and NYSED laws and regulations, certain non-health care staff may be trained to administer student specific EpiPens® (EpiPens® which have been prescribed for students with identified allergic conditions and have been provided by the parents of those students). These staff members will receive specific in-service training annually.

Since the new “safety needle” EpiPens® are becoming slowly available and the
manufacturer recommends replacing the used EpiPen® in the hard plastic case after use, training will include how to replace the EpiPen® in the case with a one-handed technique to avoid a needle stick. Employees will be instructed in closing the plastic case securely and bringing the used EpiPen® to the Health Office for disposal in the medical waste container (unless the EMT removes the used EpiPen® from the scene with the student for transport to the hospital).

**Medical Treatment for Exposure Incidents**
All costs related to medical evaluation and treatment of the employee arising out of a potential Bloodborne Pathogens Exposure Incident will be paid by the School District. The employee will not bear any out of pocket costs. All bills or “Explanation of Benefits” statements with co-pays should be submitted to the Health Services Coordinator.

**Records**
The Health Service Department office maintains the employee “OSHA Records.” A file is maintained for each employee who meets the criteria described in the “Risk Assessment of School District Positions” section. The file contains documentation of Hepatitis B vaccine, Bloodborne Pathogens Exposure Incidents, and any other relevant documents. Training Attendance sheets are kept with the Health Services Coordinator and department secretaries. The file is maintained for the employee’s duration of employment with the School District + 30 years.