

Berrien Regional Education Service Agency

EXPOSURE CONTROL PLAN FOR DEALING WITH BLOODBORNE PATHOGENS

Issued January 1993 (as amended November 1996)
(as amended June 2001) (as amended October 2014)
Revised January 2018

Exposure Determination

The District has determined which categories of its employees have "occupational exposure." Occupational exposure means reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties.

The following District job classifications, full-time, part-time, temporary and contract employees, are reasonably anticipated to have contact with blood or OPIM. This group will be known as Category A and will be:

Principal, BLC & LEC
Assistant Principal, BLC
Secretaries, BLC & LEC
Special Education Teachers
School Nurses
Custodians
Para-professionals
Health Care Aide (s)
Music Therapist
Physical Therapist (s)
Physical Therapy Assistant (s)
Occupational Therapist (s)
School Social Worker (BLC & LEC)
Speech Therapists

All other employees are determined as having little to no risk of exposure and are considered to be Category B.

Methods of Compliance

1. Universal Precautions – will be observed at Berrien RESA in the provision of first aid, the removal of sharps and waste from the first aid station, and the housekeeping of any first aid area in order to prevent contact with blood or OPIM. All blood and OPIM will be considered infectious regardless of the perceived status of the source individual.
2. Engineering and Work Practice Controls – are limited to handwashing and housekeeping practices. (see needles) Where scissors are used in a medical procedure and become contaminated they are classified as a contaminated sharp and discarded in approved sharps container.
3. Hand washing – facilities are available to the employees who incur exposure to blood or other potentially infectious materials. MIOSHA requires that these facilities be readily accessible after incurring exposure. At Berrien RESA, handwashing facilities are located in each restroom and at BLC in the nursing office.

Upon providing first aid or incurring exposures when handwashing facilities are not feasible, Berrien RESA is required to provide either an antiseptic cleanser in conjunction with a clean cloth/paper towel or antiseptic towelettes. Antiseptic towelettes cannot be used when hands are visibly soiled or when exposed to OPIM or blood. If these alternatives are used, then the hands are to be washing with soap and running water as soon as feasible.

4. Needles – Berrien RESA uses safety needles per OSHA requirements.

Work Area Restrictions

In work areas (i.e. nurse's office) where there is a reasonable likelihood of exposure to blood or other potentially infectious materials, employees are not to eat, drink, apply cosmetics or lip balm, smoke, or handle contact lenses.

Personal Protective Equipment

All first aid personal protective equipment used in patient treatment, first aid, or housekeeping involving blood or OPIM at Berrien RESA will be provided without cost to employees. Personal protective equipment will be chosen based on the anticipated exposure to blood or other potentially infectious materials. The protective equipment will be considered appropriate only if it does not permit blood or OPIM to pass through or reach the employee's clothing, skin, eyes, mouth, or other mucous membranes under normal conditions of use and for the duration of time which the protective equipment will be used.

Protective clothing will be provided to first aid and housekeeping employees involved in first aid in the following manner:

PPE kits will be located in each classroom and in each off-site location where it is easily accessible to the school staff. They will be distributed at the beginning of each school year by the building principal/designee or off-site supervisor. Examples of when the PPE should be used includes potential exposure to blood or any OPIM.

The PPE kits available at Berrien RESA include:

- Gloves
- Fluid-proof gowns
- Head and foot coverings
- Face/eye shield
- Pocket mask
- Antiseptic towelettes
- Gauze

All personal protective equipment will be disposed of by Berrien RESA at no cost to employees. All replacements will be made by Berrien RESA at no cost to employees.

All personal protective equipment will be removed prior to leaving the work area. If visibly contaminated, the equipment shall be placed in an appropriately designated area or container for storage, washing, decontamination or disposal. The following procedure has been developed to facilitate leaving the equipment at the work area: BLC – in nurse's office, LEC – in custodian's office; off-site locations – bagged and custodian called to remove properly. Gloves must be changed between patient contacts.

No food or drink is to be in any refrigerators where OPIM is possible.

If an employee were to have another person's blood or OPIM splash or soak their clothing, they would make arrangements to remove the contaminated clothing as soon as possible. This clothing would be laundered at Berrien RESA's expense. The clothing would be identified as contaminated and any employee exposed to it would be notified and protected from exposure.

Gloves shall be worn where it is reasonably anticipated that employees will have hand contact with blood, other potentially infectious materials, non-intact skin, and mucous membranes. Gloves will be available from

specific area designated by the building principal or off-site supervisor for employee's work location. For employees with latex allergies, Berrien RESA will provide at their expense appropriate non latex gloves. Employees will change gloves in between patient to patient contact. Employees must wash their hands immediately after glove removal and OPIM contact. Mucous membranes will need to be flushed after contact of OPIM.

Employees will minimize risk of blood/OPIM splashing during first aid activities and masks must be worn. No mouth suctioning or pipetting.

Disposable gloves used at Berrien RESA are not to be washed or decontaminated for re-use and are to be replaced as soon as practical when they become contaminated or as soon as feasible if they are torn, punctured, or when their ability to function as a barrier is compromised. Utility gloves may be decontaminated for re-use provided that the integrity of the glove is not compromised. Utility gloves will be discarded if they are cracked, peeling, torn, punctured, or exhibits other signs of deterioration or when their ability to function as a barrier is compromised.

Housekeeping

First aid stations and areas involved in a first aid incident will be cleaned and decontaminated according to the following schedule:

For BLC and LEC, if blood or OPIM on surfaces or floors, building custodian will be contacted for clean up as soon as feasible. For off-site locations, if no custodian is on duty, staff will clean and decontaminate area(s) with prescribed cleansers as designated by building, grounds and maintenance supervisor for Berrien RESA. Staff will wear PPE as appropriate.

All areas will have a cleaning/decontamination schedule based on location, type of surface, type of soil and tasks performed.

Decontamination will be accomplished by utilizing the following materials:

Oxivir TB wipes

All contaminated work surfaces will be decontaminated after completion of procedures and immediately or as soon as feasible after any spill of blood or OPIM materials, as well as the end of the work shift if the surface may have become contaminated since the last cleaning.

Regulated Waste Disposal

All bins, pails, cans, and similar receptacles for regulated waste disposal in any area normally involved in first aid or clean up shall be appropriately colored or labeled as containing biohazards and shall be inspected, emptied and decontaminated on a regularly scheduled basis. Note: Disposal of feminine hygiene products and bandages or Kleenex used in self-administered first aid (bloody nose, small cut) are not considered regulated waste and will be disposed of in the normal waste stream. Biohazard disposal bags/containers should be obtained from the custodian at BLC, LEC and off-site programs housed at public school buildings. For other programs not housed at a school, staff should contact the supervisor of grounds, maintenance and custodial services for Berrien RESA.

The Nursing office has a regular waste pickup schedule in compliance with the medical waste regulatory act.

If the primary container has the possibility of a puncture, a secondary leak proof container will be used prior to disposal/shipping.

Laundry

- Laundry that is or may be soiled with blood or other potentially infectious material or that may contain contaminated sharps shall be treated as if it were contaminated and shall be handled as little as possible with a minimum of agitation.
- Contaminated laundry shall be bagged at the location where it was used and shall not be sorted or rinsed in areas where students are cared for.
- Contaminated laundry shall be placed and transported in bags or containers labeled or color-coded in accordance with the provisions of R325.70014. If laundry is wet and presents the likelihood for soaking through or leaking from the bag, it shall be placed and transported in leak proof bags.
- Laundry workers must wear protective gloves and other appropriate personal protective work clothing while handling contaminated laundry.
- All contaminated laundry is cleaned and laundered in such a way that any bloodborne pathogens present are inactivated or destroyed.
- Universal precautions in the handling of all soiled laundry, alternative labeling or color coding is sufficient if it permits all employees to recognize the containers that are required to be in compliance with universal precautions.
- If contaminated laundry is shipped off-site the bags must be labeled or color-coded in accordance with the provisions of R325.70014.

Standard Operating Procedures

Standard operating procedures (S.O.P.s) provide guidance and information on the anticipated first aid tasks assigned to our employees. They will be based on the form found in Appendix A and will be utilized in employee training.

Contingency Plans

Where circumstances can be foreseen in which recommended standard operating procedures could not be followed, the employer shall prepare contingency plans for employee protection, incident investigation and medical follow-up. See Appendix A.

Hepatitis B Vaccination

*HBV Vaccination Option for Employers with employees trained to render first aid Category A employees:

According to OSHA and MIOSHA policies, an employer may elect to postpone offering and administering the HBV vaccine series to Category A designated first aid trained employees if the following conditions exist:

- The primary job assignment of the first aid provider is not the rendering of first aid.
- Any first aid rendered by such persons is rendered only as a collateral duty responding solely to injuries resulting from workplace incidents, generally at the location where the incident occurred.
- Full training and personal protective equipment shall be provided to these employees
- Provision for reporting procedure that ensures that all first aid incidents involving the presence of

blood or OPIM will be reported to the employer before the end of the work shift during which the first aid incident occurred. The report must include the names of all first aid providers who rendered assistance, regardless of whether personal protective equipment was used and must describe the first aid incident, including the time and date. The description must include a determination of whether or not, in addition to the presence of blood or OPIM, an exposure incident, as defined in the standard.

- Provision for the full HBV vaccination series is to be made available as soon as possible, but no later than 24 hours following an event, to all unvaccinated first aid providers who have rendered assistance, regardless of whether personal protective equipment was used and must describe the first aid incident, including the time and date. The description must include a determination of whether or not, in addition to the presence of blood or OPIM, an exposure incident, as defined in the standard.
- In the event of a bonafide exposure incident, the portion of the standard relating to post-exposure evaluation and follow-up would apply.

Berrien RESA elects to proactively offer HBV to Category A staff. Employees in Category A will be offered the vaccination within 10 days of getting trained and being placed in their assignment. Exceptions will be those employees who have previously received the vaccine series, those with antibody testing has revealed are immune or the vaccine is contra-indicated for medical reasons.

Post-Exposure and Follow Up

When an employee experiences an exposure incident, it must be reported to his/her supervisor or building principal, the district RN and Human Resources.

All employees who experience an exposure incident will be offered post-exposure evaluation and follow-up by a licensed physician or physician extender in accordance with Centers for Disease Control and Prevention guidelines as specified in MIOSHA standard.

This follow-up will include the following:

- documentation of the report (s) of exposure, and the circumstances under which the exposure incident occurred;
- If possible, the identification of the source individual and, if possible, the status of the source individual. The blood of source individual will be tested (after consent is obtained) for HIV/HBV infectivity. If consent is not obtained, the employer shall establish that legally required consent cannot be obtained. If the source individual's consent is not required by law, his or her blood, if available, shall be tested and the results documented.
- Results of testing of the source individual will be made available to the exposed employee with the exposed employee informed about the applicable laws and regulations concerning disclosure of the identity and infectivity of the source individual.
- The employee will be offered the option of having their own blood collected for testing of their HIV/HBV serological status within 24 hours at no cost to the employee. The blood sample will be preserved for at least 90 days to allow the employee to decide if the blood should be tested for HIV serological status.
- The employee will be offered post exposure prophylaxis in accordance with the current recommendations of the US Public Health Service in consultation with a licensed healthcare professional.
- The employee will be given appropriate, confidential counseling concerning precautions to take during the period after the exposure incident. Counseling on risk reduction and the risks and benefits of HIV testing. The employee will also be given information on what potential illnesses to be

- alert for and to report any related experiences to appropriate personnel.
- The Executive Director of Human Resources has been designated to assure that the policy outlined here is effectively carried out as well as to maintain records related to this policy.

Interaction with Health Care Professionals

An employer shall ensure that the health care professional who is responsible for the Hepatitis B vaccination is provided with a copy of these rules and appendices. A written opinion shall be obtained from the health care professional who evaluates employees of this facility. Written opinions will be obtained in the following instances:

- a. When the employee is sent to obtain the Hepatitis B vaccine
- b. Whenever the employee is sent to a health care professional following an exposure incident

Health care professionals shall be instructed to limit their written opinions to:

- a. Whether the Hepatitis B vaccine is indicated and if the employee has received the vaccine, or for evaluation following the incident;
- b. A statement that the employee has been informed of the results of the evaluation;
- c. A statement that the employee has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials. (Note: The written opinion to the employer is not to reference any personal medical information.)

Training

Training for all Category A employees will be conducted prior to initial assignment to tasks where occupational exposure may occur. Training will be conducted in the following manner:

- The MIOSHA standard for Bloodborne Infectious Diseases;
- Epidemiology and symptomology of bloodborne diseases;
- Modes of transmission of bloodborne pathogens;
- This Exposure Control Plan, (IE points of the plan, lines of responsibility, how the plan will be implemented, access to the plan, etc);
- Procedures which might cause exposure to blood or other potentially infectious materials at Berrien RESA;
- Control methods which will be used at Berrien RESA to control exposure to blood or other potentially infectious materials;
- Personal protective equipment available at Berrien RESA and who should be contacted concerning its use;
- Post-exposure evaluation and follow-up;
- Signs and labels used at Berrien RESA;
- Hepatitis b vaccine program at Berrien RESA;

Training sessions shall afford employees ample opportunity for discussion and the answering of questions by a knowledgeable trainer.

Training will be conducted through on-line program and questions can be answered by the district RN. Training is coordinated by Human Resources department.

All Category A employees will receive annual refresher training. Note: This training is to be conducted within one year of the employee's previous training.

Recordkeeping

Berrien RESA shall establish and maintain a record for each employee with occupational exposure to include:

- Name
- Social security number
- Hepatitis B vaccine status
- A copy of all results of examinations, medical testing, and follow-up procedures required as part of vaccinations and post-exposure follow-up. Employer shall ensure record confidentiality
- Keeping on file for duration of employment plus 30 years

CONSENT TO DETERMINE HBV AND HIV INFECTIVITY

I understand that on _____
(date) (source individual)

was involved in an exposure incident. I do hereby grant consent to conduct a blood test in order to Determine hepatitis B virus (HBV) and human immunodeficiency virus (HIV) infectivity.

(student or legal guardian's signature) (date)

NO CONSENT TO DETERMINE HBV AND HIV INFECTIVITY

I understand that on _____
(date) (source individual)

was involved in an exposure incident. I do hereby deny consent to conduct a blood test in order to Determine hepatitis B virus (HBV) and human immunodeficiency virus (HIV) infectivity.

(student or legal guardian's signature) (date)

Berrien Regional Education Service Agency
711 St. Joseph Avenue
Berrien Springs, Michigan 49103

HEPATITIS B

VACCINATION DECLINATION

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

Print Name: _____

Job Classification: _____

Signature

Date

USING PERSONAL PROTECTIVE EQUIPMENT

GOWN:

Put gown on and wrap it around the back of your clothing.
Tie strings at neck and waist

GLOVES:

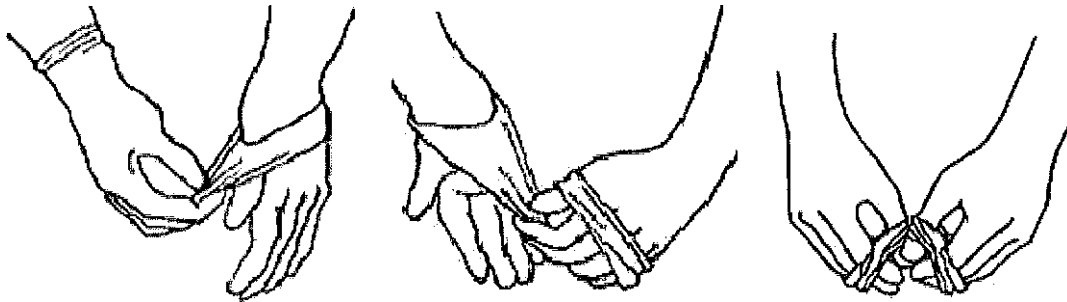
Put gloves on. Cover the edges of the gown's sleeves by pulling the gloves over the cuffs.

FACE SHIELD OR MASK/GOGGLES:

Position the shield or mask goggles over your eyes nose or mouth.
Adjust elastic band high enough so it won't slide off.

REMOVAL OF GLOVES:

Remove gloves first using the following steps.



1. Grasp one of the gloves and cuff and pull it partway off. The glove will turn inside out. It is important to keep the first glove partially on your hand before removing the second glove. This protects you from touching the outside of either glove with your bare hands.
2. Leaving the first glove over your fingers, grasp the second glove near the cuff and pull it part of the way off. The glove will turn inside out. It is important to keep the second glove partially on your hand to protect you from touching the outside surface of the first glove with your bare hand.
3. Pull off the two gloves at the same time, being careful to touch only the inside surfaces of the gloves with your bare hands.
4. Dispose of the gloves by placing inside out in the trash.
5. Wash hands thoroughly with soap and water.

REMOVAL OF PROTECTIVE CLOTHING:

1. Remove face shield or mask/goggles
2. Face shield may be decontaminated with Hillyard 181
3. Face masks should be placed in a plastic lined waste container
4. Remove gown by untying the strings at neck and waist
5. Place fingers of left hand under the cuff of right sleeve
6. Pull right sleeve partially off
7. With right hand slide left sleeve off
8. Hold gown away from your body
9. Fold gown back to the front and then top to bottom – outside of gown is now turned in
10. Dispose of gown in plastic lined waste container

BERRIEN REGIONAL EDUCATION SERVICE AGENCY
711 St. Joseph Avenue
Berrien Springs, Michigan 49103

STAFF ACCIDENT/EXPOSURE INCIDENT REPORT

EMPLOYEE NAME: _____ BUILDING: _____

ROOM # _____ TIME OF INCIDENT: _____ AM/PM

DATE OF INCIDENT: _____

POTENTIALLY INFECTIOUS MATERIALS:

TYPE: _____

SOURCE INDIVIDUAL: _____

HISTORY OF WHAT HAPPENED: (How was incident caused - give brief description of what occurred)

PERSONAL PROTECTIVE EQUIPMENT BEING USED:

TYPE OF BEHAVIOR: (✓ one that applies)					
<input type="checkbox"/>	Spitting	<input type="checkbox"/>	Biting	<input type="checkbox"/>	Urination
<input type="checkbox"/>	Defecation	<input type="checkbox"/>	Masturbation	<input type="checkbox"/>	Bleeding
<input type="checkbox"/>	Other	Specify: _____			

ACTIONS TAKEN (decontamination, clean-up, reporting, etc.):

EMPLOYEE'S SIGNATURE: _____

AN EXPOSURE INCIDENT OCCURRED: Yes No

SUPERVISOR/NURSE SIGNATURE: _____

If an exposure incident has occurred, notify supervisor immediately and complete remainder of form. Also complete BLOOD/BODY FLUID EXPOSURE WORKSHEET.

EMPLOYEE STATUS PRIOR TO EXPOSURE:

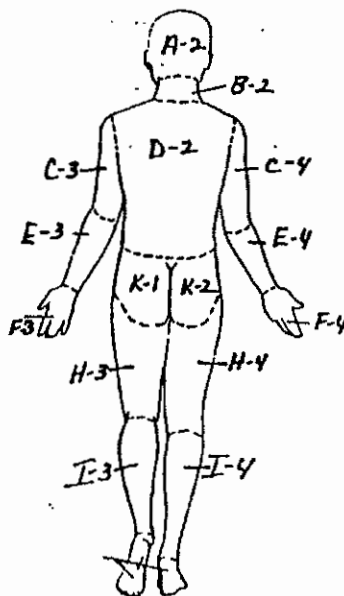
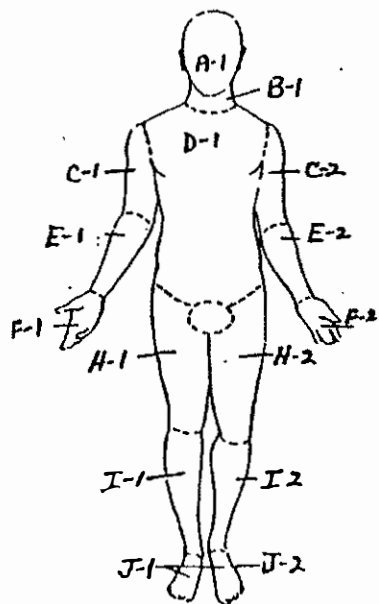
	YES	NO	DATE AND/OR NAME
RECOMBIVAC Series			
Test for Anti-BHs			
HBIG			
RECOMBIVAC Booster			
Notify Health Department			
Notify Company Physician			
Reported to Human Resources			

REPORTED BY: _____

SUBMIT TO IMMEDIATE SUPERVISOR FOLLOWING INCIDENT.

COPIES TO:

- Employee medical file
- Physician



Universal Precautions

Procedures for handling spilled Blood and Body Fluids

STEP

1



Put on disposable gloves (latex or vinyl).

STEP

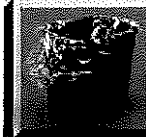
2



Use Paper Towels to absorb spill.

STEP

3



Place used towels in leak-proof plastic bag.
(Extensive spills - use RED plastic bag).

STEP

4



Flood area with bleach solution*, alcohol, or
a dry sanitary absorbent agent.

STEP

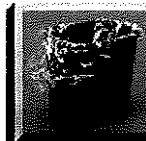
5



Clean area with paper towels, vacuum,
or broom & dust pan.

STEP

6



Place used towels, vacuum cleaner bag, or
waste in leak-proof plastic bag.

STEP

7



Remove gloves - pull inside out.

STEP

8



Place used gloves in bag and tie.

STEP

9



Wash hands with soap and water for at least 10
seconds.

* Bleach solution = 1 part bleach to 10 parts water