

Lewis & Clark Bloodborne Pathogens Exposure Control Plan

Last revision date: September 1, 2009

The administration of Lewis & Clark is committed to the prevention of incidents or accidents that will result in injury and illness, and to comply with the Oregon OSHA Bloodborne Pathogens Standard, OAR 437-02-1910.1030; and through this written exposure control plan, share responsibility to ensure performance under that responsibility. Lewis & Clark (hereafter referred to as the Lewis & Clark) adopts this exposure control plan as an element of its Safety and Health Policy and Procedures.

A. ***PURPOSE***

The purpose of this exposure control plan is to:

1. Eliminate or minimize employee occupational exposure to human blood or other potentially infectious materials (hereafter referred to as OPIM).
2. Identify employees occupationally exposed to blood or OPIM while performing their regular job duties.
3. To provide employees exposed to blood and OPIM information and training. A copy of this plan is available to all employees during normal work hours at Facilities Services (Building 47), Risk Management Office, Room 206.
4. Comply with the Oregon Bloodborne Pathogens Standard, OAR 437-02-1910.1030.

A. ***EXPOSURE DETERMINATION***

The Lewis & Clark has performed an exposure determination for all common job classifications that may be expected to incur occupational exposures to blood or OPIM. This determination was made without regard to the use of Personal Protective Equipment (hereafter referred to as PPE). The following lists those job classifications in this category.

- 1) Health Services nurse practitioners
- 2) Health Services nurses both registered and limited practical
- 3) Health Services medical assistants
- 4) Health Services laboratory technologists
- 5) Health Services physicians
- 6) Health Services office manager

The following is a list of job classifications in which some employees may have occupational exposures. Not all of these employees are expected to incur exposure to blood or OPIM. The job classification, tasks, and procedures are listed below.

Job Classification	Task/Procedure
1) Campus Living department Resident Advisors	First aid-collateral duty
2) Campus Living department Area Directors	First aid-collateral duty
3) Campus Safety Officers.	First aid-collateral duty
4) Physical Education/Athletics trainers	First aid-collateral duty
5) Physical Education/Athletics lifeguards	First aid-collateral duty
6) Animal laboratory personnel	Handling sharps

B. COMPLIANCE METHODS

2) Universal Precautions

Universal precautions recognize all body fluids as though they are contaminated with bloodborne pathogens. This method of infection control requires the employer and employee to assume that all human blood and specified human body fluids are infectious for Human Immunodeficiency Virus (hereafter referred to as HIV) and Hepatitis B Virus (hereafter referred to as HBV), and other bloodborne pathogens. Where differentiation of types of body fluids is difficult or impossible, all body fluids are to be considered as potentially infectious.

3) Engineering Controls and Work Practices

Engineering controls:

- Self-sheathing hypodermic syringes
- Puncture-resistant disposal containers for contaminated sharps, orthodontia wire, or broken glass
- Mechanical needle recapping devices
- Bio-safety cabinets

Work practice controls:

- Providing readily accessible hand washing facilities
- Washing hands immediately after glove removal
- Equipment sterilization/decontamination
- Prohibiting eating, drinking, or smoking in work areas where there is a likelihood of exposure to bloodborne pathogens or OPIM

Engineering controls and work practice controls will be used by all employees to eliminate or minimize occupational exposure at the Lewis & Clark. The following engineering controls must be followed:

1. Sharps containers must:
 - a. Be puncture resistant
 - b. Be properly labeled/color-coded for biohazards
 - c. Be leak proof
 - d. Not allow employees to reach into the container by hand
 - e. Be conveniently located within the work area
 - f. Maintained in an upright position
 - g. Be replaced routinely and not allowed to overfill

4) Storage, transportation or shipping containers must:

- a. Be closeable
- b. Be properly labeled or color-coded for biohazards.
- c. Be leak proof
- d. Be puncture resistant

The following are work practices that must be followed by employees with occupational exposure:

1. Wash hands with soap and water immediately or as soon as possible after removing gloves or other protective equipment.
2. Flush mucous membranes with water immediately or as soon as possible following contact of body areas with blood or OPIM.
3. Do not bend, recap or remove contaminated needles unless no alternative is feasible or such action is required by a specific medical procedure. The preferred method is to place contaminated needles in the sharps container immediately after use.
4. Do not shear or break contaminated needles.
5. Immediately close sharps containers when full. Place in a secondary container if leakage is possible.
6. Do not eat, drink, smoke, apply cosmetics, apply lip balm, or handle contact lenses in work areas where there is a likelihood of occupational exposure.

7. Do not keep food and drink in refrigerators, freezers, shelves, cabinets, or on countertops or bench tops where blood or OPIM are present.
8. Perform procedures involving blood or OPIM to minimize splashing, spraying, spattering, and generation of droplets.
9. Do not pipette blood or OPIM by mouth suction.
10. Place blood or OPIM only in containers that prevent leaks during collection, handling, processing, storage, transport, or shipping.
11. If a specimen could puncture a container, it must be placed in a puncture resistant secondary container.
12. Examine and properly decontaminate, if feasible, all equipment prior to serving or shipping.
13. Attach a warning label to all parts or equipment that remain contaminated, and make sure all affected employees, the servicing representative and/or manufacturer, as appropriate are informed of its status.
14. Wear gloves when you anticipate hand contact with blood OPIM, mucous membranes, and non-intact skin, and when you perform vascular access procedures and/or handle or touch contaminated items or surfaces.
15. Remove disposable gloves as soon as possible when contaminated or as soon as possible when torn, punctured or ineffective as a barrier. Never wash disposable gloves for re-use.
16. Properly decontaminate utility gloves before re-using. Discard utility gloves if they are cracked, peeling, torn, punctured, or exhibit other signs of deterioration.
17. Remove garments immediately or as soon as possible if they are penetrated by blood or OPIM.
18. Remove all personal protective equipment before leaving the work area.
19. Place used personal protective equipment only in designated areas or containers for storage, washing, decontamination, or disposal.
20. Do not pick up broken glassware directly with the hands. Use mechanical means such as a dustpan and broom, tongs, or forceps.

3. Personal Protective Equipment (PPE)

The following PPE will be provided at not cost to employees:

- a. Body protection: gown, smocks, lab coats (Health Services staff only)
- b. Gloves: natural rubber latex (all subject employees)
- c. Face masks: (all subject employees)
- d. Eye protection: (Health Services staff only)

The directors of departments with subject employees are responsible for issuing appropriate, readily accessible, PPE, without cost to the employees. Hypoallergenic gloves, glove liners, or powderless gloves, or other similar alternatives will be issued to employees who are allergic to the gloves normally provided.

All PPE will be removed prior to leaving the work area. All PPE will be cleaned, laundered, and disposed of by the Lewis & Clark at no cost to the employee. PPE, when removed, will be placed in the disposal room of the Health Center, basement, Templeton Student Center.

5) Housekeeping

- a. General Housekeeping Procedures:

All equipment and environmental and working surfaces will be cleaned and decontaminated using appropriate disinfectants as soon as feasible after any contact with blood or OPIM.

Protective coverings will be used to cover equipment and environmental surfaces and will be removed/replaced when contaminated or at the end of the workday.

Skyline Building Maintenance will clean the Health Center in all patient treatment/examining areas on a daily basis.

- b. Regulated Waste:

Contaminated sharps and other regulated waste will be discarded using only approved containers that are sturdy, leak proof, and appropriately labeled. Where there is risk of the container contents puncturing the container it will be placed in secondary puncture-resistant container.

- c. Contaminated Laundry:

Contaminated laundry shall be handled as little as possible with minimum agitation. It must be bagged or containerized where it was used and must not be sorted or rinsed where it was used.

Contaminated laundry must be placed and transported in bags or containers that are properly labeled for biohazards.

When contaminated laundry is wet and could possibly soak through or leak from a bag or container, it must be placed in leak-proof bags or containers.

Employees will wear proper PPE when handling contaminated laundry.

6) Hepatitis B Vaccine, Post-Exposure Evaluation, and Follow-up:

a. Hepatitis B Vaccination:

The Lewis & Clark will offer at no cost to exposed employees the HBV vaccination series, and the post-exposure follow-up to those who have had an exposure incident within 10 workdays. The Medical Coordinator of the Student Health Service is in charge of administering the HBV vaccinations.

The Medical Coordinator of the Student Health Service will ensure that all medical evaluations and procedures including the hepatitis B vaccine and vaccination series and post-exposure follow-up, including prophylaxis are:

- 1) Made available at no charge to the employee, at a reasonable place and time.
- 2) Performed or supervised by a licensed healthcare professional according to CDC recommendations.

b. Post-Exposure Evaluation and Follow-up:

When an employee has an exposure incident, it will be reported to the Lewis & Clark Risk Management Coordinator.

Following a reported exposure incident, the exposed employee will immediately receive a confidential medical evaluation that will include the following elements:

- 1) It is at no cost to the employee.
- 2) It is made available at a reasonable time and place.
- 3) It is performed by/or under the supervision of a licensed physician or healthcare professional, and

- 4) Provided according to recommendations of the U.S. Public Health Service current at the time evaluations and procedures take place.
- 5) All sample analysis is performed at an accredited laboratory at no cost to the employee.

All employees who incur an exposure incident will be offered post-exposure evaluation and follow-up. All post-exposure follow-ups will be performed by the Oregon Health Sciences University.

c. Information Provided to the Healthcare Professional

The Risk Management Coordinator will ensure that the healthcare professional responsible for the employee's hepatitis B vaccination is provided with the following:

- 1) A copy of OAR 437, Division 2, Subdivision Z, Toxic and Hazardous Substances, Bloodborne Pathogens (29CFR 1910.1030)
- 2) A description of the exposed employee's duties as they relate to the exposure incident.
- 3) Documentation of the route(s) of exposure and circumstances under which exposure occurred.
- 4) Results of the source individual's blood testing, if available; and
- 5) All medical records relevant to the appropriate treatment of the employee including vaccination status.

d. Healthcare Professional's Written Opinion

The Risk Management Coordinator will obtain and provide the employee with a copy of the evaluating healthcare professional's written opinion with 15 days of the completion of the evaluation.

The healthcare professional's written opinion for HBV vaccination will be limited to whether HBV is indicated for an employee, and if the employee has received such vaccination.

6. Communication of Hazards

1. **Labels and Signs.** The Medical Coordinator of the Student Health Services will ensure that biohazard labels are on each container of regulated waste according the section g of the standard.

Warning labels must be affixed to all containers, including refrigerators and freezers containing blood or OPIM. Refer to the standard for label design requirements.

2. Information and Training

The Risk Management Coordinator will ensure training is provided at the time of initial assignment to tasks where occupational exposure to blood or OPIM may occur, and that it shall be repeated annually. Said training will occur so as to be paid time for the employees attending. Training will include:

- 1) The regulation (29CFR 1910.1030).
- 2) Epidemiology and symptoms of bloodborne pathogens.
- 3) Modes of transmission of bloodborne pathogens.
- 4) The exposure control plan.
- 5) Methods for recognizing tasks that involve potential exposure to blood or OPIM.
- 6) Universal precautions (engineering controls, work practices, and PPE).
- 7) Proper decontamination and disposal procedures.
- 8) Appropriate PPE.
- 9) HBV vaccination.
- 10) Emergency actions regarding blood and OPIM.
- 11) Exposure incident procedures.
- 12) Post-exposure and follow-up.
- 13) Signs/labeling for regulated waste.

EXPOSURE CONTROL SAFETY RULES

1. If hand washing facilities are not available use antiseptic hand cleaner in conjunction with clean paper towels or antiseptic towelettes and wash hands with soap and water as soon as possible.
2. Wash hands immediately or as soon as feasible after removal of gloves or other PPE.
3. Wash hands and any other skin with soap and water, or flush mucous membranes with water immediately or as soon as possible after contact with blood or OPIM.
4. Contaminated needles will not be bent, recapped, broken, or sheered. All needles used are single use, disposable needles. After use they will immediately be placed in sharp's containers.
5. Eating, smoking, drinking, or the application of cosmetics or lip baum is not allowed in work areas where there is any likelihood of exposure to blood or OPIM.

6. Refrigerators containing blood or OPIM specimens will not be used to store food or drink.

7. Mouth pipetting/suctioning of blood or OPIM will not be used.

Lewis & Clark

Hepatitis B Vaccination & Declination Form

Dear Colleague,

As a result of a risk assessment of your functional job activities it has been determined that you are at risk of work related exposure to hepatitis B virus (HBV), a serious and potentially life-threatening illness. By this letter Lewis & Clark hereby offers you vaccination with HBV vaccine. This vaccine would be administered in three injections over a six month period and is offered **at no cost to you.** This is not mandatory. Your options are:

- ☐ Receive the vaccine (schedule an appointment at the Student Health Center).
- ☐ Receive a titers blood draw to test for HBV antibodies if you think you may already have been vaccinated (also at the Student Health Center and also **at no cost to you.**).
- ☐ Decline vaccination.

Please indicate your choice by checking **ONE** of the boxes above. Declining vaccination is appropriate if you are absolutely certain HBV vaccination has already been received. If in doubt, titers is recommended. If you are declining vaccination, please carefully read the following:

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 infection, 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.

Please print your name, date, and sign this form and return it to: Risk Management, Mailstop Code 76, Facilities Services.

Name (please print)

Date

Signature