

South Coast ESD EXPOSURE CONTROL PLAN

POLICY

The South Coast Education Service (SCESD) is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this endeavor, the following Exposure Control Plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with OSHA standard 29 CFR 1910.1030, "Occupational Exposure to Bloodborne Pathogens."

The ECP is a key document to assist the SCESD in implementing and ensuring compliance with the standard, thereby protecting employees. This ECP includes:

1. Determination of employee exposure by exposed individual
2. Implementation of various methods of exposure control, including universal precautions
3. Engineering and work practice controls:
 - a. Personal protective equipment
 - b. Housekeeping
4. Hepatitis B vaccination
5. Post-exposure evaluation and follow-up (Supervisor &/or Safety Officer)
6. Communication of hazards to employees and training
7. Recordkeeping
8. Procedures for evaluating circumstances surrounding exposure incidents (Maintenance Program Administrator &/or Safety Manager)

An exposure incident is a specific eye, mouth, other mucous membrane, non-intact skin or parenteral contact with blood or other potentially infectious materials (OPIM).

PROGRAM ADMINISTRATION

- SCESD's Maintenance Department and Safety Officer are responsible for the implementation of the ECP. Under the oversight of the SCESD's Maintenance Department, the Maintenance Program Administrator &/or Safety Manager will maintain, review and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. Contact phone number: 541-266-3951.
- Those employees who are determined to have occupational exposure to blood or OPIM must comply with the procedures and work practices outlined in this ECP.
- SCESD Program Departments will maintain and provide all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard. SCESD Program Departments will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes. Contact phone number: 541-266-3951.
- The Human Resources Department will be responsible for ensuring that all medical actions required are performed and that appropriate employee health and OSHA records are maintained. Contact phone number: 541-266-3951
- The Human Resources Department will be responsible for scheduling training, documentation of training, and making the written ECP available to employees, OSHA, and The National Institute for Occupational Safety and Health (NIOSH) representatives. Contact phone number: 541-266-3951
- The Toxic and Hazardous Substances Bloodborne Pathogens OSHA OAR 437 is located on the safety page of the SCESD website and can be found at <https://www.scesd.k12.or.us/safety-committee/>

EMPLOYEE EXPOSURE DETERMINATION

The following is a list of all job classifications at our establishment in which **all** employees have occupational exposure:

<u>JOB TITLE</u>	<u>DEPARTMENT/LOCATION</u>
Nurses/LPHA/CNA	SCESD Main Office Buildings/School Sites
Custodians	SCESD Main Office Buildings
Maintenance Specialists	SCESD Main Office Buildings Bus

The following is a list of job classifications in which **some** employees have occupational exposure. Included is a list of tasks and procedures, or groups of closely related tasks and procedures, in which occupational exposure may occur for these individuals:

<u>JOB TITLE</u>	<u>DEPARTMENT/LOCATION</u>	<u>TASK/PROCEDURE</u>
• EI/ECSE & ALS Teachers	SCESD Main Office Buildings/District Locations	Feeding, Student Self-Care
• Instructional Assistant (IA)	SCESD Main Office Buildings/District Locations	Feeding, Student Self-Care
• SLP/SLPAs	SCESD Main Office Buildings/District Locations	Feeding, Student Self-Care
• Specialists who evaluate/ Provide direct care	SCESD Main Office Buildings/District Locations SCESD Main Office Buildings/District Locations	Feeding, Student Self-Care Feeding, Student Self-Care
• Administrators who have Students	SCESD Main Office Buildings/District Locations	Feeding, Student Self-Care
• Audiologist	SCESD Main Office Buildings/District Locations	Feeding, Student Self-Care

Part-time, temporary, contract and per diem employees are covered by the ECP the same as any other employee of SCESD.

METHODS OF IMPLEMENTATION AND CONTROL

1. Universal Precautions

- All employees will utilize universal precautions by presuming all bodily fluids are contaminated.

2. Exposure Control Plan

- Employees covered by the bloodborne pathogens standard will receive an explanation of this ECP during their initial training session through SafeSchools online training portal. It will also be reviewed in their annual refresher training provided through SafeSchools online training portal.
- All employees shall have an opportunity to review this plan at any time during their work shifts by contacting the Maintenance Department or Human Resources Department. If requested, the Human Resources Department will provide an employee with a copy of the ECP within fifteen (15) days of the request. The ECP will also be available on the SCESD's web page under the Facilities heading.

SCESD's Maintenance Department and Safety Officer is responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect any new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

3. Engineering Controls and Work Practices

Engineering controls and work practice controls will be used to prevent or minimize exposure to bloodborne pathogens.

The specific engineering controls and work practice controls used are listed below:

- Safety goggles or face mask will be worn when working with potentially contaminated fluids.
- Safety goggles or face masks will be worn when working with children known to spit.

- Safety shin and arm guards/sweatshirts will be worn when working with children known to bite, pinch or kick.
- Sharps disposal containers will be inspected regularly and maintained or replaced by the assigned nurse to prevent overfilling.
- Exam gloves will be worn when performing nursing duties with a patient.
- Exam gloves will be worn when cleaning up blood, vomit or other bodily fluids.
- Exam gloves will be used when feeding or doing self-care with students
- Leather gloves will be worn when working with wood, metal or glass.

The safety team, safety officer and/or program administrators will identify the need for changes in engineering control and work practices through review of OSHA records, employee interviews, committee activities, incident reports and 801 reports. Non-managerial staff will be solicited, as required by the OSHA standard, in the review of engineering controls, new products and work practices.

Personal Protective Equipment (PPE)

PPE is provided to our employees at no cost to them. Training is provided by the employee's program administrator in the use of the appropriate PPE for the tasks or procedures employees will perform.

The types of PPE available to employees are as follows:

- Gloves
- Face shield or protective goggles
- Shin and arm guards/protective sweatshirts
- Body fluid cleanup kits (CB Office-Janitors closet, IA Workroom, GB Office-Storage Closet w/First Aid Kit)

PPE is located in program department office/storage locations and may be obtained by contacting the staff members program secretary, building custodian, Maintenance Department and/or Human Resources Department.

All employees using PPE must observe the following precautions:

- Hands are to be washed immediately or as soon as feasible after removal of gloves or other PPE.
- PPE is to be removed after it becomes contaminated and before leaving the work area.
- Used PPE is to be disposed of in the appropriate labeled plastic container for storage, laundering, decontamination or disposal.
- Appropriate gloves are to be worn when it can be reasonably anticipated there may be hand contact with blood or OPIM and when handling or touching contaminated items or surfaces.
- Gloves are to be replaced if torn, punctured, contaminated, or if their ability to function as a barrier is compromised.
- Utility gloves may be decontaminated for reuse if their integrity is not compromised but must be discarded if they show signs of cracking, peeling, tearing, puncturing, or deterioration.
- Leather or other protective gloves are to be used whenever working with sharp edged materials, lumber, or metal materials.
- Disposable gloves are never to be washed or decontaminated for reuse.
- Appropriate face and eye protection is to be worn when splashes, sprays, spatters, or droplets of blood or OPIM pose a hazard to the eye, nose, or mouth.
- Face shield or goggles are to be worn whenever it can be reasonably anticipated that spitting may occur or when working with equipment that ejects material into the air when used, e.g. grinders, saws, hammers, etc.
- Any garment contaminated by blood or OPIM shall be removed immediately, or as soon as feasible, in such a way as to avoid skin or eye contact.
- Disposal and/or decontamination of PPE is the responsibility of the Safety Officer in SCESD buildings and Custodial in district buildings.
- If a cut is on finger ensure it is bandaged before gloving.

Housekeeping

Regulated waste is to be placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded (see Labels), and closed prior to removal to prevent spillage or protrusion of contents during handling.

Contaminated sharps are discarded by a SCESD designated nurse(s) immediately or as soon as possible in containers that are closable, puncture-resistant, leak proof on sides and bottoms, and labeled or color-coded appropriately. Sharps disposal containers are available at the nurse's office. Sharps containers are hand delivered by a SCESD designated nurse(s) to the nearest medical clinic and/or county waste collection center for disposal as needed.

Bins and pails (e.g., wash or emesis basins) are cleaned and decontaminated as soon as feasible after visible contamination.

Broken glassware which may be contaminated is picked up using mechanical means, such as a brush, tongs and dust pan.

The SCESD will use OSHA accepted products to disinfect surfaces and/or equipment contaminated by blood or OPIM. Those approved products are:

- EPA-registered tuberculocidal disinfectants
- Diluted bleach solutions
- EPA-registered disinfectants labeled as effective against both HIV and HBV
- Sterilants/High-Level Disinfectants cleared by the FDA

While cleaning contaminated surfaces and equipment, the worker is to:

- Wear personal protective equipment (PPE) provided by the employer
- Thoroughly clean up all blood or OPIM before applying the disinfectant
- Leave the surface wet with the disinfectant for a minimum of ten (10) minutes
- Dispose of infectious waste following the bloodborne pathogen standard

Labels

The following will be appropriately labeled as biohazards:

- Containment bags
- Sharps containers
- Red biohazard bags
- Red biohazard containers

The Maintenance Department Program Administrator and/or Safety Officer is responsible for ensuring that warning labels and red bags are used as required for regulated waste and contaminated equipment brought into the facility.

The school nurse will ensure warning labels are affixed or red bags are used as required for regulated waste or contaminated equipment in the facility.

Employees are to notify the Maintenance Department Program Administrator and/or Safety Officer if they discover regulated waste containers, contaminated equipment, etc. without proper labels.

HEPATITIS B VACCINATION

The SCESD Human Resources Department will provide new employees informational flyer on hepatitis B vaccinations, and explain how the process works within the organization.

The SCESD Nurse Coordinator or designee will provide training to employees on hepatitis B vaccinations, addressing

the safety, benefits, efficacy, methods of administration, and availability.

The hepatitis B vaccination series is available at no cost after training and within ten (10) days of initial assignment to employees identified in the exposure determination section of this plan. Vaccination is encouraged unless:

- 1) Documentation exists that the employee has previously received the series;
- 2) Antibody testing reveals that the employee is immune; or
- 3) Medical evaluation shows that vaccination is contraindicated.

However, if an employee chooses to decline vaccination, the employee must sign a declination form (**Appendix A**). Employees who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the vaccination is kept in the employee's health record at the SCESD Office.

POST-EXPOSURE EVALUATION AND FOLLOW-UP

Should an exposure incident occur, the SCESD's Human Resources Administrator shall be contacted at the following number: 541-266-4046. A confidential medical evaluation by a licensed health care professional and follow-up will be immediately made available to the employee by the Human Resources Department.

Following the initial first aid (clean the wound, flush eyes or other mucous membrane, etc.), the following activities will be performed:

- Document the routes of exposure and how the exposure occurred.
- Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).
- Obtain consent and make arrangements to have the source individual tested as soon as possible to determine HIV, HCV, and HBV infectivity; document that the source individual's test results were conveyed to the employee's health care provider.
- If the source individual is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.
- Assure that the exposed employee is provided with the source individual's test results and with information about applicable disclosure laws and regulations concerning the identity and infectious status of the source individual (e.g., laws protecting confidentiality).
- After obtaining consent, collect exposed employee's blood as soon as feasible after exposure incident, and test blood for HBV and HIV serological status.
- If the employee does not give consent for HIV serological testing during collection of blood for baseline testing, the baseline blood sample will be preserved for at least ninety (90) days.
- If the exposed employee elects to have the baseline sample tested during the 90-day waiting period, the testing will be performed as soon as feasible.

Following the medical evaluation, a copy of the healthcare professional's written opinion will be obtained and provided to the employee. It will be limited to whether the employee requires the hepatitis vaccine and whether the vaccine was administered.

ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

The Benefits and Risk Manager will ensure that health care professional(s) responsible for an employee's hepatitis B vaccination, post-exposure evaluation and medical follow-up are given a copy of OSHA's bloodborne pathogens standard.

The Human Resource Administrator will also ensure the health care professional evaluating an employee after an exposure incident receives the following:

- A description of the employee's job duties relevant to the exposure incident;
- Route(s) of exposure;
- Circumstances of exposure; and
- If possible, results of the source individual's blood test.

The employee will be provided a copy of the evaluating healthcare professional's written opinion within fifteen (15) days after completion of the evaluation.

PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

The Safety Committee will review the circumstances of all exposure incidents to determine:

- Engineering controls in use at the time
- Work practices followed
- A description of the device being used (including type and brand)
- Protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)
- Location of the incident
- Procedure being performed when the incident occurred
- Employee's training

EMPLOYEE TRAINING

If it is determined that revisions need to be made, the SCESD's Maintenance Administrator and/or Safety Officer will see that these changes are made and incorporated in the SCESD's ECP employee training program.

All employees who have occupational exposure to bloodborne pathogens will receive online training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program will cover at a minimum the following elements:

- A copy and explanation of the OSHA bloodborne pathogen standard
- An explanation of our ECP and how to obtain a copy
- An explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
- An explanation of the use and limitations of engineering controls, work practices, and PPE
- An explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE
- An explanation of the basis for PPE selection
- Information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine will be offered free of charge
- Information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM
- An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available
- Information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
- An explanation of the signs and labels and/or color coding required by the standard

RECORDKEEPING

Training Records

Training records are completed for each employee upon completion of training. These documents will be maintained by the Human Resources Department for at least **three years** at the SCESD Office.

The training records include:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names of all employees completing the online training

Employee training records are provided upon request to the employee or the employee's authorized representative within fifteen (15) working days. Such requests are to be addressed to the Human Resources Department.

Medical Records

In accordance with OSHA regulations under Part 1904 "Recording and Reporting Occupational Injuries", in Title 29 of

the federal code, The SCESD shall maintain a record of sharps injuries.

The SCESD's Human Resource Administrator will record all percutaneous injuries from contaminated sharps on the OSHA 300 Log of Work-Related Injuries and Illnesses and the OSHA 301 Injury and Illness Incident Report.

- Records of sharps injuries will be maintained in a manner that can easily be separated from other types of work-related injuries and illnesses.
- The information in the log shall be recorded and maintained in such a manner as to protect the confidentiality of the injured employee (e.g., removal of personal identifiers).

At a minimum, the sharps injury recordkeeping shall contain:

- The type and brand of device involved in the incident (if known);
- The department or work area where the exposure incident occurred; and
- An explanation of how the incident occurred.

The SCESD will determine the format and whether the log is maintained electronically or on paper. The log will be reviewed as a part of the annual program evaluation and maintained for at least five (5) years following the end of the calendar year covered. No copy will be provided to anyone without the removal of the personal identifiers.

Medical records are maintained for each employee with occupational exposure in accordance with 29 CFR 1910.1020, "Access to Employee Exposure and Medical Records."

The Human Resources Department is responsible for maintenance of the required medical records. These **confidential** records are kept at the SCESD Office for at least the **duration of employment plus 30 years**.

Employee medical records are provided upon request of the employee or to anyone having written consent of the employee within fifteen (15) working days. Employee requests for their medical records are to be made to the SCESD's Human Resources Department.

APPENDIX A

HEPATITIS B VACCINE DECLINATION (MANDATORY)

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, 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.

Employee

Printed Name: _____

Employee

Signature: _____ Date: _____

Appendix B

Hepatitis B Vaccination Consent/Declination

As an employee having occupational exposure to potentially infectious materials, you have the right to receive the Hepatitis B vaccination series **free of charge** (paid for by SCESD). Please read the Hepatitis B Vaccine Information Sheet provided and complete this form by checking the box preceding the appropriate statement, signing and dating this form. You must also complete the Screening Questionnaire for Adult Immunization form when meeting with the nurse.

CONSENT: As an employee having occupational exposure to blood or other potentially infectious materials, including the risk of acquiring Hepatitis B virus (HBV) infection, I have been informed about and offered the opportunity to receive the Hepatitis B vaccine, at **no charge to me**. I understand that I must have **3 doses** of the vaccine to develop immunity. However, as with any medical treatment, there is no guarantee that I will become immune or that I will not experience any adverse side effects from the vaccine. **I accept the offer at this time.**

VACCINATION RECORD

	Dose #1	Dose #2	Dose #3
Date of Dose			
Lot #			
Exp. Date			
Site: Circle One	Left Deltoid Right Deltoid	Left Deltoid Right Deltoid	Left Deltoid Right Deltoid
Administered by:			

Employee Name (please print)

Employee Signature

Today's Date