St Norbert College – Bloodborne Pathogens Exposure Control Plan

Methods of Implementation and Control

Policy

Facility Name: St Norbert College
Date of Preparation: Original preparation, April 17, 1992
The purpose of this Exposure Control Plan is to:

1. Eliminate or minimize employee occupational exposure to blood or other body fluids.
2. Identify employee occupations that may be exposed to blood or other potentially infectious materials (OPIM) while performing their regular duties of their jobs.
3. To provide employees exposed to blood and OPIM, information and training on prevention of exposure and a systematic process for assessing an exposure occurrence. A copy of this plan is available to all employees during the normal work day at Health and Wellness Services, lower level, Main Hall.

Program Administration

Health and Wellness Services is responsible for the implementation of the ECP. The Sr. Director of Health and Wellness Services will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures.

Contact location: Health and Wellness Services
Phone number: 920.403.3266

Those employees who are determined to have occupational exposure to blood or other potentially infectious materials (OPIM) must comply with the procedures and work practices outlined in this ECP.

Health and Wellness Services 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. Health and Wellness Services will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.

Contact location: Health and Wellness Services
Phone number: 920.403.3266

Health and Wellness Services will be responsible for ensuring that all medical actions required are performed and that appropriate employee health and OSHA records are maintained.

Contact location: Health and Wellness Services
Phone number: 920.403.3266
Health and Wellness Services will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives.  

**Contact location:** Health and Wellness Services  
**Phone number:** 920.403.3266

### Employee Exposure Determination

The Health and Wellness Services has performed an exposure determination for *all* common job classifications which may be expected to incur occupational exposures to blood or other potentially infectious materials. This exposure determination is made without regard to use of PPE (Personal Protective Equipment). The following is a list of those job classifications in this category:

- Athletic Trainers and Student Trainers
- Nurses and select staff members in Health and Wellness Services
- Housekeeping
- Safety Officers and Student Safety interns

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

#### Athletics

<table>
<thead>
<tr>
<th>Job Title</th>
<th>Department/Location</th>
<th>Task/Procedure</th>
</tr>
</thead>
</table>
| Athletic Trainers/ Athletic Training Student Aides | Athletics | • Athletic injury and wound care  
• Debridement  
• Bandaging |

**PPE:**

1. Use of appropriate sized gloves, face masks and shields as indicated with the type of potential exposure

**Engineering work practice controls:**

1. Soap and water readily available or use of hand sanitizer if no water available
2. Sharps containers for contaminated sharps
3. Self-sheathing needles and syringes
4. Policy for no re-capping of needles or re-sheathing of scalpels
5. Tongs, broom, dust pan available for sharps pick up and disposal.
6. Biomedical waste containers labeled with Biohazard Insignia, lined with red biohazard bags; disposed of in a certified biohazard waste removal process
7. Routinely clean surfaces of treatment table with a biomedical solution that will kill blood-borne pathogens on surfaces.
<table>
<thead>
<tr>
<th>Job Title</th>
<th>Department/Location</th>
<th>Task/Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Laundry Operators</td>
<td>Athletics</td>
<td>• Laundering athletic wear&lt;br&gt;• Laundering towels/cloths used in the care of the injured athlete</td>
</tr>
</tbody>
</table>

**PPE:**
1. Use of appropriate sized gloves in collecting and placing used towels, uniforms and other garments into the washing machine

**Engineering work practice controls:**
1. Routinely clean laundering machines, collection baskets and any other equipment utilized in the laundering of athletic wear.

<table>
<thead>
<tr>
<th>Job Title</th>
<th>Department/Location</th>
<th>Task/Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housekeeping</td>
<td>Athletics&lt;br&gt;Health &amp; Wellness Services&lt;br&gt;Kress Inn&lt;br&gt;REH</td>
<td>• General cleaning</td>
</tr>
</tbody>
</table>

**PPE:**
1. Use of appropriate sized and rubber type gloves when cleaning surfaces and equipment, including floors, walls, light fixtures, bathrooms, sinks etc.
2. Visible blood or body fluids will be treated with a biochemical solution that will ensure decontamination specific to blood borne pathogens

**Health and Wellness**

<table>
<thead>
<tr>
<th>Job Title</th>
<th>Department/Location</th>
<th>Task/Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nurses</td>
<td>Health and Wellness</td>
<td>• Injections&lt;br&gt;• Medical procedures&lt;br&gt;• Wound care&lt;br&gt;• Phlebotomy&lt;br&gt;• Body fluid specimen collection and testing</td>
</tr>
</tbody>
</table>

**PPE:**
1. Use of appropriate sized gloves, face masks and shields as indicated with the type of potential exposure
Engineering work practice controls:
1. Soap and water readily available or use of hand sanitizer if no water available
2. Sharps containers for contaminated sharps in each clinical area
3. Self-sheathing needles and syringes
4. Manufacturer’s cover on centrifuge used every time a specimen is centrifuged
5. Policy for no re-capping of needles or re-sheathing of scalpels, probes, sutures
6. Tongs, broom, dust pan available for sharps picked up and disposal.
7. Biomedical waste containers labeled with Biohazard Insignia, lined with red biohazard bags; disposed of in a certified biohazard waste removal process.
8. Clean surfaces of treatment table with a biomedical solution that will decontaminate for blood-borne pathogens on surfaces.

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<tr>
<th>Job Title</th>
<th>Department/Location</th>
<th>Task/Procedure</th>
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<tbody>
<tr>
<td>Housekeepers</td>
<td>Health and Wellness</td>
<td>• General cleaning in clinical area (see checklist to be signed by housekeepers after each cleaning)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• On call for special cleaning in areas where injuries and illness have occurred in hall/public areas</td>
</tr>
</tbody>
</table>

PPE:
1. Use of appropriate sized and rubber type gloves when cleaning surfaces and equipment, including floors, walls, light fixtures, bathrooms, sinks etc.
2. Visible blood or body fluids will be treated with a biochemical solution that will ensure decontamination specific to blood borne pathogens

Campus Safety

<table>
<thead>
<tr>
<th>Job Title</th>
<th>Department/Location</th>
<th>Task/Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safety Officers (fulltime/student)</td>
<td>Campus Safety</td>
<td>• Responding to injuries/illness on campus</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Providing first aid and CPR</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Controlling assaults/handling soiled articles</td>
</tr>
</tbody>
</table>

PPE:
1. Use of appropriate sized gloves, face masks as indicated with the type of potential exposure.
Engineering work practice controls:
1. Soap and water readily available or use of hand sanitizer if no water available
2. Sharps containers for contaminated sharps
3. Self-sheathing needles and syringes
4. Plastic cover for vehicle seat

Implementation and Control

1. Universal Precautions
“Universal Precautions” recognizes all body fluids as though they are infected 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 HIV, HBV, HCV, 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 regardless of the perceived status of the source individual.

2. Engineering Controls and Work Practices
Engineering and Work Practice Controls will be used by all employees to eliminate or minimize occupational exposures at this facility. The Engineering Controls are:
   1. Hand washing facilities are available in rooms in which medical and athletic treatment processes take place. Single use towels or air driers will be used for drying. If sinks are not readily available, the use of alcohol based hand sanitizer is provided.
      a. Wash hands or other skin surfaces immediately after contact with bodily fluids
      b. After removing gloves or other protective equipment
   2. Gloves, masks, goggles, smocks
      a. N95 masks fit tested and provided for substances requiring this level of protection
      b. CPR mouth guard
   3. Needle design to protect from needle stick injury
   4. Sharps container in all areas where needle use occurs
   5. Waste containers with lids and insignia signage/ color denoting hazardous material
   6. Air filters with variable air exchanges in rooms with communicable disease/ airborne particles
   7. Centrifuge with lid for specimen reduction

3. Personal Protective Equipment (PPE)
The following PPE will be provided at no cost to employees:
Body Protection:
   1. Mouth guard for CPR
   2. Gloves, masks, smocks

Gloves and Masks:
Gloves for all specimen collection/injections, wound care, procedures
Masks for all assessments related to illness, specimen collection, tissue cultures, procedures such as ear lavage, wound irrigation, treatment applications
Eye Protection:
1. Ear lavage
2. Incision and Drainage assistance
3. URI 6I + 6U diagnostic assessments and specimen collection

Special PPE:
1. N95 respiratory masks for airborne or droplet communicable disease secretions and specimen collections.
2. Rubber gloves for biological waste disposal and containment.

The Health and Wellness Services Sr. Director is assigned the responsibility to ensure and issue appropriate readily accessible PPE, without cost, to employees. Hypoallergenic gloves, glove liners, powderless gloves, or other similar alternatives shall be readily accessible to those 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 employer at no cost to the employee. PPE, when removed, will be discarded in general waste containers, unless “saturated” with potential Blood Borne Pathogens. “Saturated” items will be disposed of in the waste container scheduled for professional waste disposal.

**Housekeeping**
The facility will be cleaned and decontaminated according to the following schedule:

<table>
<thead>
<tr>
<th>Area</th>
<th>Schedule</th>
<th>Cleaner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clinical exam rooms, lavatory and lab rooms</td>
<td>Daily</td>
<td>Housekeeping</td>
</tr>
<tr>
<td>Athletic training rooms</td>
<td>Daily</td>
<td>Housekeeping</td>
</tr>
</tbody>
</table>

**Contaminated Laundry**
Contaminated laundry in athletics will be cleaned at the athletic department by an individual with OSHA Bloodborne pathogen training.

**Regulated Waste**
The following procedures will be followed:
Sharps containers will be closed between uses and when full the top will be locked and placed in the biohazardous red bag lined cardboard container, sealed and kept until scheduled pick up. Biohazardous waste will be disposed of through Steri-Cycle Disposal Services on a routine schedule.

**Labels and Signs**
Health and Wellness Services Sr. Director will ensure biohazard labels are on each container of regulated waste, on centrifuge, sharps containers, and lab specimen refrigerator door. Employees are to notify (Name of responsible person or department) if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc., without proper labels.
**Hepatitis B Vaccine and Post Exposure Evaluation and Follow-up**

**Hepatitis B Vaccination**

St Norbert College Health and Wellness Services will offer, at no cost to employees, the hepatitis B vaccination series within 10 working days after receiving the initial job assignment or notification from facilities of a new housekeeper. The Sr. Director of Health and Wellness Services is in charge of the Hepatitis B vaccination program. The Sr. Director of Health and Wellness Services will ensure that all medical evaluations and procedures including the hepatitis B vaccine and vaccination series and post exposure follow-up, including prophylaxis, are:

a. Made available at no cost to the employee at a reasonable place and time
b. Performed or supervised by a licensed healthcare professional according to the recommendation of the CDC.

However, if an employee declines the vaccination, the employee must sign a declination form. Employees who decline may request and obtain the vaccination at a later date at no cost.

**Post exposure Evaluation and Follow-up**

When an employee has an exposure incident, it will be reported to the Sr. Director of Health and Wellness Services. Following a reported exposure incident, the exposed employee will receive a confidential medical evaluation as soon as possible. If after hours, the individual will be referred to Bellin Hospital for the medical interview. All employees who incur an exposure incident considered to be a high risk exposure will be offered post exposure evaluation and follow-up in accordance with the OSHA Blood-borne Pathogen standard. All post exposure follow-ups will be performed by Bellin Hospital or the hospital of the employee’s choice.

**Information Provided to the Healthcare Professional**

The Sr. Director of the Health and Wellness Services will ensure the healthcare professional responsible for the employee’s hepatitis B assessment is provided the following:

- Dates of Hepatitis B vaccination series
- Notification if documentation of vaccination has been received.

**Healthcare Professional’s Written Opinion**

The Sr. Director of the Health and Wellness Services will obtain and provide the employee with a copy of the evaluating healthcare professional’s written opinion within 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. The healthcare professional’s written opinion for post exposure follow-up will be limited to the following information:

- Status of HIV testing and results of tests.
- Status of testing for HCV and results of tests.

**Information and Training**

Health and Wellness Services will ensure training is provided at the time of initial assignment to tasks where occupational exposure may occur, and that it shall be repeated within 12 months of the previous
training. The training program will be tailored to the education and language level of the employee, and offered during the normal work shift. The training will contain the following information:

- Work Practice Controls and PPE
- Changes in procedures and corresponding changes in particular measures.

Additional training will be given to employees when there are any changes of tasks or procedures affecting the employee’s occupational exposure.

**Recordkeeping**

The Sr. Director of the Health and Wellness Services is responsible for maintaining medical records. These individual records will be kept in the Health and Wellness Services locked medical files for the duration of employment, plus 30 years or in the electronic medical record, CCHIT certified.

**Training Records**

The Sr. Director of the Health and Wellness Services is responsible for maintaining training records. These records will be kept in the Health and Wellness Services training files. All employee records will be made available to the employee as needed or requested.

**Evaluation and Review**

The Sr. Director of the Health and Wellness Services is responsible for reviewing this program, its effectiveness, and for updating as needed.

Revised February, 2017: September, 2018
Chrystal D. Woller BSN, RN
Sr. Director of Health and Wellness Services