

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 electronically.
4. Comply with the OSHA Bloodborne Pathogen Standard, 29 CFR 1910.1030.

Program Administration

Health Services is responsible for the implementation of the ECP. Health Services will maintain, review, and update the ECP regularly to include new or modified tasks and procedures.

Contact location: Health 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 Services will coordinate the purchase and maintenance of necessary (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard.

Contact location: Health Services

Phone number: 920.403.3266

Health Services, in coordination with Human Resources, 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 Services

Phone number: 920.403.3266

Contact location: Human Resources

Phone number: 920.403.3211

Human Resources will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives.

Contact location: Human Resources

Phone number: 920.403.3211

Employee Exposure Determination

Health Services, in coordination with Human Resources, have 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 contracted through Prevea
- Equipment Managers and Student Workers
- Nurses and staff members in Health Services
- Housekeeping including Kress Inn Employees
- Campus Safety Officers
- Laundry and Equipment Managers and Student Workers

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

Job Title	Department/Location	Task/Procedure
Athletic Trainers Fitness Center Student Workers	Athletics	<ul style="list-style-type: none"> ● Athletic injury and wound care ● Debridement ● Bandaging

*Athletic Trainers oversight and management is authorized through Prevea Health.

PPE:

1. Use of appropriate sized gloves, face masks, pocket 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 is available.
2. Sharps containers for contaminated sharps.
3. Self-sheathing needles and syringes.
4. Policy for no recapping 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 the treatment table with a biomedical solution that will kill blood-borne pathogens on surfaces.

Job Title	Department/Location	Task/Procedure
Laundry Operator/Equipment Manager and Student Workers	Athletics	<ul style="list-style-type: none"> ● Laundering athletic wear ● Laundering towels/cloths used in the care of the injured athlete

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.

Job Title	Department/Location	Task/Procedure
Housekeeping	Campus Locations Kress Inn	<ul style="list-style-type: none"> ● General cleaning

PPE:

1. Use of appropriate sized and rubber type gloves when cleaning surfaces and equipment, including floors, walls, light fixtures, bathrooms, sinks etc.

Engineering Work Practice Controls:

1. Visible blood or body fluids will be treated with a biochemical solution that will ensure decontamination specific to blood borne pathogens.

Health Services

Job Title	Department/Location	Task/Procedure
Nurses, Support Staff and Health Educator	Health Services	<ul style="list-style-type: none"> ● Injections ● Medical procedures ● Wound care and injury management ● Phlebotomy ● Body fluid specimen collection, testing and clean up

PPE:

1. Use of appropriate sized gloves, gown, 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 is 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 recapping 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 with a biomedical solution that will decontaminate for blood-borne pathogens.

Job Title	Department/Location	Task/Procedure
Housekeepers	Health Services	<ul style="list-style-type: none"> ● General cleaning in clinical area (see checklist to be signed by housekeepers after each cleaning) ● On call for special cleaning in areas where injuries and illness have occurred in hall/public areas

PPE:

1. Use of appropriate sized and rubber type gloves when cleaning surfaces and equipment, including floors, walls, light fixtures, bathrooms, sinks etc.

Engineering Work Practice Controls:

1. Visible blood or body fluids will be treated with a biochemical solution that will ensure decontamination specific to blood borne pathogens.

Campus Safety

Job Title	Department/Location	Task/Procedure
Safety Officers	Campus Safety	<ul style="list-style-type: none"> ● Responding to injuries/illness on campus ● Providing first aid and CPR ● Controlling assaults/handling soiled articles

PPE:

1. Use of appropriate sized gloves, face masks, and pocket 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 is available.
2. Sharps containers for contaminated sharps.
3. Plastic cover for vehicle seat.
4. Bloodborne Pathogens Protection and Clean-Up Kit.

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. Single use towels or air dryers 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. Wash hands after removing gloves or other protective equipment.
2. Gloves, masks, goggles, gowns and lab coats.
 - a. N95 masks fit tested and provided for substances requiring this level of protection.
 - b. CPR face shield or pocket mask.
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. Pocket mask for CPR.
2. Gloves, masks, face shields and isolation gown or lab coat.

Gloves and Masks:

Gloves for all specimen collection/injections, wound care, procedures and clean up.

Face Shields, masks, and/or pocket masks for assessments related to illness, specimen collection, tissue cultures, procedures such as ear lavage, wound irrigation, treatment applications, CPR, or clean up.

Eye Protection:

1. Ear lavage.
2. Diagnostic assessments and specimen collection.
3. Clean up.

Special PPE:

1. *N95 respiratory masks for airborne or droplet communicable disease secretions and specimen collections.*
2. *Gloves for biological waste disposal and containment.*

Health Services is assigned the responsibility to coordinate appropriate readily accessible PPE. 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 accordingly.

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:

Area	Schedule	Cleaner
Clinical exam rooms, lavatory and lab rooms	Daily	Housekeeping
Athletic training rooms	Daily	Housekeeping

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 biohazard red bag lined container, sealed and kept until scheduled pick up. Health Services biohazardous waste will be disposed of through Steri-Cycle Disposal Services on a routine schedule.

Labels and Signs

Health Services will ensure biohazard labels are on each container of regulated waste, on centrifuge, sharps containers, and the 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 Services will administer, at no cost to employees, the hepatitis B vaccination series within 10 working days after receiving the initial job assignment. Health Services oversees the Hepatitis B vaccination program. The hepatitis B series will be:

- 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 federal guidance.

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 employee's supervisor in accordance with St. Norbert College's workers compensation injury reporting procedure. Following a reported exposure incident, the exposed employee will receive a confidential medical evaluation as soon as possible. The individual will be referred to Bellin Health for medical evaluation. 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 evaluations will be performed by Bellin Health or the healthcare system of the employee's choice.

Information Provided to the Healthcare Professional

Health Services will assist the employee with access to hepatitis B vaccination or records to support off campus evaluation and treatment. This may include:

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

Healthcare Professional's Written Opinion

Bellin Health or the employee's provider of choice, will 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 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.

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.

Information and Training

Human Resources 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

Health Services is responsible for maintaining employee medical records. These individual records will be kept and maintained in the employee's electronic health record for the duration of employment, plus 30 years or in the electronic medical record.

Training Records

Human Resources is responsible for maintaining training records. These records will be kept electronically in Workday. All employee records will be made available to the employee as needed or requested.

Evaluation and Review

Health Services, in coordination with Human Resources, is responsible for reviewing this program, its effectiveness, and for updating as needed.

Revised February, 2017: December, 2022