

Exposure Control Plan (ECP) for Bloodborne Pathogens

Purpose

Fort Lewis College 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 our firm in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP includes:

- Determination of employee exposure;
- Implementation of various methods of exposure control, including:
 - Universal precautions,
 - Engineering and work practice controls,
 - Personal protective equipment, and
 - Housekeeping
- Hepatitis B vaccination;
- Post-exposure evaluation and follow-up;
- Communication of hazards to employees and training;
- Recordkeeping; and
- Procedures for evaluating circumstances surrounding an exposure incident.

The methods of implementation of these elements of the standard are discussed in the subsequent pages of this ECP.

Administrative Duties

The Health Center is responsible for the implementation of the ECP. The Health Center will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. Contact location/phone number: 970.247.7355.

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.

The Health Center 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. The Director of the Health Center will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes. Additionally, The Health Center will be responsible for ensuring that all medical actions required are performed and that appropriate employee health records are maintained. Finally The Health Center will be responsible for training, documentation of training, and making the written ECP available to employees or their designated representatives.

Employee Exposure Determination

The following is a list of all job classifications at Fort Lewis College in which all employees have occupational exposure:

- Health Center Physician Assistant
- Health Center Registered Nurse and Licensed Practical Nurse
- Campus Police
- Athletic Trainer and Student Athletic Trainer

The following is a list of job classifications in which some employees at Fort Lewis College have occupational exposure:

- Conference Services Utility Crew
- Coaches
- Physical Plant, College Union Building, and Residence Life Custodians
- Health Center Administrative Assistant
- Resident Life Directors, Resident Assistants and Assistant Directors
- Lab Instructors and student lab instructors
- Outdoor Pursuits Director and Assistant director
- Plumbers
- Athletic Equipment Manager and Assistant Manager
- Swimming Pool Lifeguards and Certified Pool Operator
- Intramural Open Recreation Supervisors
- Child Development Center Employees and Child Development Student Workers
- Student Life Center director, Assistant Director and Student Life Center Employees
- Police Officers and Assistants

Even though student instructors/workers are not employees, they will be covered under this policy if they have potential for exposure to bloodborne pathogens with the department they are working. On the first day of service, if there is potential for the student to be exposed, the student will be instructed by the department director on the proper use of gloves. Then the student will receive the complete BBP training later.

The above job classifications will have mandatory BBP training within 30 days of employment. It will be at the discretion of department chairs as to whether the training will be provided on an annual basis. Hepatitis B immunization will be offered to the new employees within 10 days with a right to waiver. There will be no cost for these services. If the employee has waived the immunization offering initially and has an exposure to a BBP, post-exposure care must be offered within 24 hours.

Training will be made available to all other job classifications, but it is not required. It will be at the discretion of the department directors to make training mandatory, either one time or annually, for their department. The College will not pay for Hepatitis B immunizations for this group of employees. However the Health Center will offer the immunizations for the same low cost it charges students. If an employee in this group has an exposure to a BBP, they should report the exposure to their immediate supervisor and then follow the process for Workers' Compensation as

outlined in sections VI.

Methods of Implementation and Control

Universal Precautions

All employees will utilize universal precautions.

Exposure Control Plan

Employees covered by the bloodborne pathogens standard receive an explanation of this ECP during their initial training session. It will also be reviewed in their annual refresher training. All employees have an opportunity to review this plan at any time during their work shifts by contacting Virginia Newman, at the Health Center. If requested, Fort Lewis College will provide an employee with a copy of the ECP free of charge and within 15 days of the request.

Virginia Newman is responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect any new or modified tasks and procedures that affect occupational exposure and to reflect new or revised employee positions with occupational exposure. The review and update of such plans must also:

- Reflect changes in technology that eliminate or reduce exposure to bloodborne pathogens; and
- Document annually consideration and implementation of appropriate commercially available and effective safer medical devices designed to eliminate or minimize occupational exposure.

The following lists the safer devices Virginia Newman has identified as possible additions in our last annual review, which took place, August 18, 2008:

Device:

Methods used to evaluate device:

Decision whether or not to implement:

Justification for decision:

Student Health Services solicits input from non-managerial employees responsible for direct patient care in the identification, evaluation, and selection of effective engineering and work practice controls. Only those employees responsible for direct patient care who are potentially exposed to injuries from contaminated sharps need be contacted. Our solicitation method involves the following: employee suggestions, vendor presentations, professional association recommendations and informal discussions with peers. Virginia Newman documents all solicitation in the ECP.

The following lists the engineering and work practice controls identified during solicitation in our last annual review:

Engineering or work practice control:

Employee solicited:

Decision whether or not to implement:

Engineering and Work Practice Controls

Engineering 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:

- Retractable needles

Sharps disposal containers are inspected and maintained or replaced by staff in either the Health Center or Athletic Training Room as needed to prevent overfilling. The Health Center will contract with a medical waste disposal company to dispose of the waste.

This facility identifies the need for changes in engineering control and work practices through the Health Center. The new procedures or new products will be evaluated by the Health Center staff and /or Health and Safety Committee and implemented as appropriate.

Personal Protective Equipment (PPE)

PPE is provided to our employees at no cost to them. Training is provided by Health Center staff 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: latex gloves, face shield, disposable respiratory protection and clothing, if needed. PPE is located in various laboratories, Athletic Training facility and the Health Center.

All employees using PPE must observe the following precautions:

- Mandatory use of PPE if potentially infectious materials are encountered
- Use only PPE that is properly fitted
- Use double gloves as needed
- Employees who are allergic or sensitive to latex will be provided hypo-allergenic gloves, or powder less gloves.

The procedure for handling used PPE is as follows:

- Remove all PPE and place it in a designated container.
- Dispose of contaminated PPE in red-colored bags
- Wash thoroughly after disposing of contaminated PPE

Housekeeping

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

The procedure for handling sharps disposal containers is: contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leak proof on sides and bottoms, and labeled or red color-coded appropriately.

The procedure for handling other regulated waste is: place in the designated containers.

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

Labels

Labels and other warnings will be affixed to contaminated materials to warn others. Each department is responsible for ensuring labels are attached to materials or containers.

Hepatitis B Vaccination

Hepatitis B vaccination provides a means to protect employees at Fort Lewis College from infection caused by Hepatitis B. The term Hepatitis B vaccination refers to the vaccine and vaccination series. All related services will be provided to employees at no cost.

The Health Center staff (or other designated representative) 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 10 days of initial assignment to employees identified in the exposure determination section of this plan. The Human Resources office will notify the Health Center by e-mail of all new employees. If the employee has not been to a training session, the Health Center nurse will explain the process before administration. Vaccination is encouraged unless:

1. Documentation exists that the employee has previously received the series,
2. Antibody testing reveals that the employee is immune. Employees have the right to request an antibody titre to check for immunity at no charge prior to starting the vaccination series.
3. Medical evaluation shows that vaccination is contraindicated.
4. The employee declined the vaccine. In this case, if the employee initially declines Hepatitis B vaccination, but at a later date decides to accept the vaccination, it will be provided to the employee at that time at no cost.

However, if an employee chooses to decline vaccination, the employee must sign a declination form. Documentation of refusal of the vaccination is kept at The Health Center.

Following hepatitis B vaccinations, the health care professional's Written Opinion will be limited to whether the employee requires the hepatitis vaccine, and whether the vaccine was administered.

Post-exposure Evaluation and Follow-Up

If an employee does have an exposure incident it shall be reported, investigated and documented. Employees who have been exposed to BBP shall report the incident through normal Workers' Compensation procedures, i.e., reporting first to the immediate supervisor, then Human Resources and then to the Urgent Care Center at Mercy Medical Center. Since it is imperative that medical attention be sought promptly, the employee is permitted to go to the Urgent Care Center at Mercy Medical Center before going to the supervisor or to the office of Human Resources.

The employee needs to be sure to inform the registration desk that they are from Fort Lewis College and that the employee's services at the Urgent Care Center will be covered by Workers'

Compensation. It is very important that an employee with a Bloodborne Pathogen exposure be seen the day of the incident.

Administration of Post-Exposure Evaluation and Follow-up

The Health Center ensures that health care professional(s) responsible for employee's hepatitis B vaccination and post-exposure evaluation and follow-up are given a copy of this procedure. Following an employee report of a possible exposure incident, the Health Center will:

- Immediately make available to the employee a confidential medical evaluation by a designated Health Care Professional
- Prepare a confidential comprehensive follow-up reporting the exposure incident.
- Provides the employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

Procedures for Evaluating the Circumstances Surrounding an Exposure Incident

The department in which the potential exposure occurred will review the circumstances of all exposure incidents to determine if revisions need to be made, and will communicate these findings to the Director of the Health Center. The directors will ensure that appropriate changes are made to this ECP.

Employee Training

All employees who have occupational exposure to bloodborne pathogens receive training conducted by staff of The Health Center. All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, use of personal protective equipment and transmission of bloodborne pathogen diseases. Training materials for this facility are available at The Health Center or on-line.

Recordkeeping

Training Records

Training records are completed for each employee upon completion of training. These documents will be kept for at least three years at The Health Center.

Medical Records

Medical records are maintained 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 15 working days. Requests should be sent to the Director of the Health Center.

Sharps Injury Log

The Director of Environmental Safety & Health establishes and maintains a sharps injury log to record percutaneous injuries from contaminated sharps. The information in the sharps injury log is recorded and maintained in the EH&S office. This protects the confidentiality of the injured employee.

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.

Signed: _____ (*employee signature*)

Date: _____