

Colchester School District Exposure Control Plan

INTRODUCTION

The Colchester School District (CSD) is committed to providing a safe and healthy environment for our staff and students. In pursuit of this goal, 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 organization 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
 - Housekeeping
- Hepatitis B vaccination
- Post-exposure evaluation and follow-up
- Communication of hazards to employees
- Training
- Recordkeeping
- Procedures for evaluating circumstances surrounding exposure incidents

Implementation methods for these elements of the standard are discussed in the subsequent pages of this ECP.

PROGRAM ADMINISTRATION

The CSD Health Services Department is responsible for the implementation of the ECP. The District Nurse Supervisor will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures.

- 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 CSD Nurses and their designee(s) will provide and maintain all necessary personal protective equipment (PPE), controls (e.g. sharps containers), labels, and bags as required by the standard and will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.
- The CSD Nurses will be responsible for ensuring that all medical actions required by the standard are performed. Human Resources will ensure that appropriate employee health and OSHA records are maintained.

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

EMPLOYEE EXPOSURE DETERMINATION

The following is a list of all job classifications in which district employees **will have** occupational exposure:

<u>Job Title</u>	<u>Department/Location</u>	<u>Task that may create exposure</u>
Custodian	Each school location	Clean up from spills, illness; handling waste
Lead Custodian	Each school location	Clean up from spills, illness; handling waste
Custodial Manager	Districtwide	Clean up from spills, illness; handling waste
Maintenance Foreman	Districtwide	Clearing debris, working with equipment
Maintenance Worker	Districtwide	Clearing debris, working with equipment
School Nurse	Each school location	Attending to student/staff illness or injury
Athletic Trainer	Colchester High School	Attending to student illness or injury

All other CSD employees, including but not limited to, principals, teachers, guidance counselors, interventionists, para educators, bus drivers, bus support staff, substitute employees, administrative support staff, food service workers, and coaches **may have** occupational exposure in the course of working with or transporting students.

NOTE: These guidelines apply to employees working in full-time, part-time, temporary, contract, and per diem positions.

METHODS OF IMPLEMENTATION AND CONTROL

Universal Precautions

Definition: Universal Precautions are the standard by which one manages contact with real or potentially infectious materials. It is an approach where all human blood and other body fluids are treated as if infectious for bloodborne pathogens. These body fluids include, but are not limited to, amniotic fluid, blood, saliva, semen, vaginal secretions, any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids.

It is expected that all employees will utilize universal precautions to prevent and control exposure to blood or other potentially infectious materials.

Employees are expected to follow the precautions outlined below:

1. Use personal protective equipment designed to prevent exposure to bloodborne pathogens. This includes gloves, masks, and eye protection, as applicable.
2. Follow hand washing protocols immediately after removing gloves.

3. Wash hands before eating, drinking, applying cosmetics or lip balm, and handling contact lenses. Restrict these activities in places where body fluids may be present or are stored.
4. Use biohazard containers for disposal of materials saturated with blood or body fluids.
5. Decontaminate all potentially contaminated equipment, surfaces, and waste receptacles.
6. Handle broken glass, sharp objects, and waste materials carefully, and discard appropriately.
7. If an employee is exposed to a BBP, they must notify the building nurse, the building administrator and/or their supervisor, and HR as appropriate.

Exposure Control Plan

All new employees covered by the bloodborne pathogens standard will receive an explanation of this ECP during their initial training. It will also be reviewed in their annual training either through the Vector Training, K-12 Edition or onsite training. All employees can review this plan at any time by contacting Human Resources, their building administrator, or the District Nursing Supervisor. If requested, we will provide an employee with a copy of the ECP.

The District Nurse Supervisor will be 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.

Engineering Controls and Work Practices

While performing work related duties, there is a potential for job related exposure to bloodborne pathogens (BBPs) for some employees. To comply with federal and state regulations, the CSD has established procedures to reduce the risk of work-related exposure to bloodborne pathogens, and/or potentially infectious materials. Employees are expected to follow the specific controls and work practices outlined below to minimize or eliminate job-related exposure:

- Sharps used for a student's personal medical care should be handled by the student when possible. They should be placed directly, without manipulation (bending needle, breaking off, etc.) into an approved sharps container.
- Sharps disposal containers are inspected and maintained by each school's building nurse. The containers for contaminated sharps must be puncture-resistant. The sides and the bottom must be leak proof. They must be appropriately labeled or color-coded to warn everyone that the contents are hazardous. Containers for disposable sharps must be closeable. They will be replaced whenever necessary to prevent overfilling.
- The Colchester School District identifies the need for changes in engineering controls and work practices through the review of OSHA records, employee interviews, and committee activities.
- New procedures and new products are reviewed regularly through literature review, supplier information, professional development, and training.

- Employees are involved in this process through committee involvement and are welcome to make suggestions for improvements in engineering practices, work practices, new procedures, or product considerations.

Personal Protective Equipment (PPE)

Personal protective equipment is provided to our employees at no cost to them. Training in the use of the appropriate PPE for specific tasks or procedures is provided by the employee's supervisor, the building school nurse, and/or through annual mandatory training on Vector Training.

The types of PPE available to employees at each school are gloves, eye protections, and masks. PPE is located in the custodial offices, nurses offices, and in the buildings and grounds office. It may be obtained from the Lead Custodian or the School Nurse.

All employees using PPE must observe the following precautions:

1. Wash hands immediately or as soon as feasible after removing gloves or other PPE.
2. Remove PPE after it becomes contaminated and before leaving the work area.
3. Used PPE will be disposed of properly.
4. Wear appropriate gloves when it is reasonably anticipated that there may be hand contact with blood or other potentially infectious materials, and when handling or touching contaminated items or surfaces. Replace gloves if torn, punctured or contaminated, or if their ability to function as a barrier is compromised.
5. Utility gloves may be decontaminated for reuse if their integrity is not compromised. Discard utility gloves if they show signs of cracking, peeling, tearing, puncturing, or deterioration.
6. Never wash or decontaminate disposable gloves for reuse.
7. Wear appropriate face and eye protection when splashes, sprays, spatters, or droplets of blood or OPIM pose a hazard to the eye, nose, or mouth.
8. Remove immediately, or as soon as feasible, any garment contaminated by blood or OPIM, in such a way as to avoid contact with the outer surface.

Clean Up Procedure

Employees must use universal precautions (treating ALL blood and body fluids as potentially infectious) to minimize exposure risk. During the school day and in school buildings, it is preferable to call the custodian as they are trained to clean up blood and body fluids. Colchester School District bus and van drivers are also trained to clean up blood and body fluids in vehicles.

Regulated waste is placed in containers which are closable, constructed to contain all contents and prevent leakage, and closed prior to removal to prevent spillage or protrusion of contents during handling. Regulated waste will be disposed of in accordance with Vermont Department of Health and Agency of Natural Resources [guidelines](#).

In all clean up events, the following steps should be followed each time:

1. Put on protective gloves. Gloves and biohazard containers are located in the nurses' office, custodial office, and in district buses and vans.
2. Spread absorbent material over the spilled blood/body fluids. Use paper towels, if needed, to spread out over the whole area.
3. Spray disinfectant over the whole area where blood/body fluid is covered with absorbent material. Let sit for a minimum of 15 minutes.
4. Use paper towels to pick up all blood/body fluid material and put in a leak-proof trash bag and then put all materials in the biohazard container along with gloves.
5. Remove gloves grabbing the cuff first pulling forward towards fingers so the glove comes off inside out and put in the biohazard container.
6. Using new gloves, mop the area using a mop bucket with fresh disinfectant. After use, bring the mop head to the laundry area and wash right away. Wipe down the mop handle with a clean paper towel and dispose of paper towels appropriately.
7. Clean out the biohazard container and store appropriately. Sharps disposal containers are inspected, maintained, and replaced by the nursing staff whenever necessary to prevent overfilling.
8. Wash hands in warm, soapy water for a minimum of 2 minutes.

Handling Sharps

The procedure for handling sharps disposal containers is as follows:

1. Follow the universal precaution cleaning procedures.
2. Contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leak proof on sides and bottoms, and appropriately labeled or color coded. Sharps disposal containers are available in the nurse's office in each building.
3. Broken glassware that may be contaminated is only picked up using mechanical means, such as a brush and dustpan.

Syringes and drug paraphernalia found on school grounds must be [handled carefully](#).

- Block off access to the area to prevent students and others from contact with the sharp.
- Immediately contact the building administrator, custodian, or school nurse.
- Put on heavy duty, puncture resistant gloves and use pliers or tongs to place the needle in a sharps container or a thick plastic container like a laundry detergent bottle.
- Screw on the lid and seal it well with strong tape, like duct tape.
- Label the container with a [sharps label](#) or "DO NOT RECYCLE" and throw it into the regular trash.
- A sharps disposal kit is available in each school through the nurse and/or custodian.

HEPATITIS B VACCINATION

It is recommended that all persons receive a Hepatitis B vaccination from their primary care provider as a matter of personal wellness. For those employees identified in the exposure determination section of this plan, the district will make the hepatitis B vaccination series available at no cost after initial employee orientation and within 10 days of initial assignment. 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 the vaccination is contraindicated.

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. Documentation of refusal of the vaccination is kept with Human Resources.

Vaccination will be provided by the employees' own healthcare provider, a local pharmacy, or by Concentra Urgent Care at 57 Fayette Road Suite 4, South Burlington, Vermont.

POST-EXPOSURE EVALUATION AND FOLLOW-UP

Should an exposure incident occur during school hours, contact the building nurse or supervisor/administrator who will coordinate with Human Resources as necessary. The following activities are recommended:

- As immediately as available, administer initial first aid by cleaning the wound, flushing the eyes or other mucous membranes, etc.
- A confidential medical evaluation and follow-up is recommended through Concentra Urgent Care. If this is not possible, follow up should occur with the individual's primary care provider or in the emergency room, as appropriate.
- Contact the Lead Custodian to begin clean-up procedures within a school or the bus driver for transportation clean-up procedures, as necessary.
- During the school day, the school nurse will document the areas of exposure and how the exposure is reported to have 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.
- If the exposed employee is provided with the source individual's test results, information about applicable disclosure laws and regulations concerning the identity and infectious status of the source individual (e.g., laws protecting confidentiality) should also be provided.

- Any post-exposure evaluation and follow-up will be handled by workers' compensation and the employee's primary care or urgent care provider.

ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

Human Resources ensures that the healthcare 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
- Relevant employee medical records, including vaccination status.

PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

The building administrator and/or supervisor 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 of clothing that was used at the time of the exposure incident
- Location of the incident
- Procedure being performed when the incident occurred
- Employee's training

Human Resources will record all reported injuries from contaminated sharps in an Injury Log.

If revisions to this ECP are necessary, the district nursing supervisor will ensure that appropriate changes are made. Changes may include an evaluation of safer devices, adding employees to the exposure determination list, etc.

EMPLOYEE TRAINING

All employees who may have occupational exposure to bloodborne pathogens receive initial and annual training conducted through the CSD online training platform.

All employees who will have occupational exposure to bloodborne pathogens will have additional training. The training program covers, at a minimum, the following elements:

1. An explanation of our ECP and how to obtain a copy.
2. An explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident.

3. An explanation of the use and limitations of work practices and PPE.
4. An explanation of the types, uses, location, removal, handling, and disposal of PPE.
5. An explanation of the basis for PPE selection.
6. Information on the Hepatitis B vaccine, the benefits of being vaccinated, and that the vaccine will be offered free of charge.
7. Information on the appropriate actions to take and persons to contact in an emergency involving blood or other bodily fluids.
8. 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
9. Information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
10. An opportunity for interactive questions and answers with a person who can help address questions or concerns.

RECORDKEEPING

Training Records

Training records are maintained through the Human Resources Department. Employee training records are provided upon request to the employee. Such requests should be addressed to the Human Resources department.

OSHA Recordkeeping:

An exposure incident is evaluated to determine if the case meets OSHA's Recordkeeping Requirements (29 CFR 1904). This determination and the recording activities are done by the Operations and Financial Management Department and Human Resources.

APPENDIX A

COLCHESTER SCHOOL DISTRICT
HEPATITIS-B VACCINATION CONSENT FORM

I understand that due to my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring the Hepatitis-B virus (HBV). Based on Colchester School District Policy, I consent to be vaccinated with the Hepatitis-B vaccine at no financial cost to myself. I do agree to have the cost of the vaccination series billed to my health insurance provider but understand that the school district will pay for any costs not covered by my insurance.

Print Name

Signature

Date

(Return this completed form to Human Resources, Central Office)

APPENDIX B

COLCHESTER SCHOOL DISTRICT
HEPATITIS-B VACCINATION DECLINATION FORM

I understand that due to my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring the Hepatitis-B virus (HBV). I have been given the opportunity to be vaccinated with the Hepatitis-B vaccine, at no financial cost to myself. However, I decline the 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.

Print Name

Signature

Date

(Return this completed form to Human Resources, Central Office)

Definitions

Bloodborne Pathogens (BBP): Pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, Hepatitis B Virus (HBV), Hepatitis C Virus (HCV), and Human Immunodeficiency Virus (HIV). Other potentially infectious materials include any body fluid that is visibly contaminated with blood.

Job Related Exposure: Real or potential contact (skin, eye, or mucous membrane) with blood or other potentially infectious materials that occurs during the performance of one's duties.

Universal Blood and Body Fluid Precautions: The standard by which one manages contact with real or potentially infectious materials. An approach where all human blood and other body fluids are treated as if infectious for bloodborne pathogens. These body fluids include, but are not limited to amniotic fluid, saliva, semen, vaginal secretions, anybody fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids.

Sharps: Devices with sharp points or edges that can puncture or cut skin. They may include needles, syringes, lancets, auto injectors, infusion sets, or connections needles/sets.