

Section G: Personnel

GBGAA Bloodborne Pathogens and Exposure Control Plan

Region 8 is committed to providing a safe working environment for staff. The following Exposure Control Plan (ECP) is designed to provide compliance with Occupational Safety and Health Administration (OSHA) standard 29 CFR 1910.1030, "Occupational Exposure to Bloodborne Pathogens."

The ECP is a key document to assist Region 8 in implementing and ensuring compliance with the standard, thereby protecting all 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 (PPE)
 - Housekeeping
- Hepatitis B Vaccination
- Post Exposure Evaluation and Follow-up
- Communication of hazards to employees and training
- Procedures for Evaluating Circumstances Surrounding an Exposure Incidents
- Record Keeping

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

Program Administration

- The Director is responsible for implementation of the ECP. The Director 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: Mid-Coast School of Technology, 1 Main Street, Rockland (207) 594-2161
- 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 Maintenance Director or designee will provide and maintain all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard. The Maintenance Director will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.

Contact location/phone number: Mid-Coast School of Technology, 1 Main Street, Rockland (207) 594-2161

- The Business Manager will be responsible for ensuring that all medical actions required by the standard are performed and that appropriate employee health and OSHA records are maintained. Contact location/phone number: Mid-Coast School of Technology, 1 Main Street, Rockland (207) 594-2161
- The Business Manager will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives. Contact location/phone number: Mid-Coast School of Technology, 1 Main Street, Rockland (207) 594-2161

Employee Exposure Determination

The following is a list of job classifications which may have moderate risk of occupational exposure:

School Nurse	Maintenance Staff	Instructors
Director	Assistant Director	Administrative Assistants
Educational Technicians	Adult Ed Instructors	Student Services Coord.

Methods of Implementation and Control

Universal Precautions – All employees will utilize universal precautions.

Exposure Control Plan – All employees will receive a copy of the ECP during their initial hire and training. The ECP will also be reviewed during an annual refresher training. All employees can review this plan at any time during their work shifts by contacting the Director. A copy of the plan will also be included in the Staff Handbook.

The Director is responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

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

Those controls shall include but not be limited to:

- A lined hazardous waste container in each first aid station/area and emptied by custodians daily.
- Sharps containers will be inspected, maintained and replaced by the Maintenance Director. They will be disposed of in a medically appropriate manner. Sharps containers are puncture resistant, leak proof, labeled with a biohazard label, and kept out of reach of students. They will be disposed of as needed and checked monthly.

- Building areas exposed to blood or OPIM will be cleaned and decontaminated immediately. SDS sheets and cleaning schedules will be kept by the Maintenance Director and will be available to all staff.
- Contaminated work surfaces will be decontaminated immediately after completion of procedures and after exposure to blood or OPIM. First Aid Stations will routinely be decontaminated at the end of the work shift by a custodian.
- Broken glass will be swept into a dustpan and disposed of in a non-penetrable waste container. Dust pans will be cleaned immediately.

Personal Protective Equipment (PPE)

All PPE 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 Maintenance Director.

Types of PPE available to employees include, but are not limited to:

- Non-latex gloves
- Utility gloves
- Hearing and eye protection

PPE is available in the main office, and classrooms. First Aid kits are available at each First Aid Station. Gloves may be obtained from maintenance staff.

All employees using Personal Protective Equipment must observe the following precautions:

- Wash hands immediately or as soon as feasible after removing gloves or other PPE.
- Wear appropriate gloves when it can be reasonably anticipated that there may be hand contact with blood or OPIM and when in contact with contaminated items or surfaces; replace gloves if torn, punctured, contaminated, or if their ability to function as a barrier is compromised.
- Gloves will be used when performing any first aid measures, and when cleaning bathrooms or any other surfaces which may contain bodily fluids.
- Remove PPE after it becomes contaminated and before leaving the work area.
- Disposable gloves will be removed by grasping the cuffs and turning them inside out. Never wash or try to decontaminate gloves for reuse.
- 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.
- Wear appropriate face and eye protection when splashes, sprays, spatters or droplets of blood or OPIM may potentially contact the eye, nose or mouth.
- 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.
- Used PPE may be disposed of in designated lined waste containers in nurse or custodial closets.

Eye Wash Stations

Eye wash stations will be available in designated areas. Maintenance of stations is responsibility of building custodians. In the event blood is splashed or sprayed into an employee's eye, immediately flush the affected eye for approximately ten minutes.

Procedure for Handling Used PPE:

Contaminated Sharps

Contaminated needles and other contaminated sharps shall be discarded in sharps containers in the school nurses' office immediately or as soon as possible. Sharps will not be bent, recapped, removed, sheared or purposely broken.

Hepatitis B Vaccine

All employees who have been identified as having moderate risk of exposure to blood or OPIM (see employee exposure determination list) will be offered the Hepatitis B vaccination series at no cost to the employee. The vaccine will be offered within ten working days of their initial assignments 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.

Arrangements for vaccination will be made through the Business Manager.

Documentation of administered vaccine doses will be kept in the employee's medical file. Employees who decline the Hepatitis B vaccine will sign a declination form. Those employees may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the vaccination will be kept in the Business Office.

Post Exposure Evaluation and Follow-Up

In the event of an accidental exposure, the procedure is as follows:

1. Immediate first aid: employee will wash the exposure site thoroughly with soap or disinfectant and water. Flush eyes and/or mucous membranes with water immediately
2. Employee will immediately report the injury to the Director, Assistant Director or Business Manager. If none of the preceding staff are available, the employee will report the incident to any available administrator.
3. A post-exposure evaluation and follow-up will be arranged for the employee at Health Connections, Pen Bay Medical Center Emergency Room or other designated facility by the Director or designee.
4. The employee will complete an Employee Incident Report form which will include the circumstances under which the incident occurred and

documentation of the route of exposure (skin, mucous membrane, etc.)
This will be submitted within 24 hours.

5. Flow of completed forms:
 - Original copies to Director's Office
 - Copy of each form retained for employee's medical file

Procedures for Evaluating Circumstances Surrounding an Exposure Incident

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

1. Engineering controls in use at the time
2. Work practices followed
3. A description of any device being used at the time of exposure
4. Protective equipment or clothing that was used at the time of the exposure (gloves, eye shields, etc.)
5. Location and time of the incident
6. Procedure being performed when the incident occurred
7. Employee's training

The School Nurse will record all injuries from contaminated sharps in a Sharps Injury Log.

If it is determined that the ECP needs revision, the Director will ensure that appropriate changes are made to the ECP.

Employee Training

All employees who have occupational exposure to bloodborne pathogens receive initial and annual training conducted by the School Nurse.

All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, 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 and used at this facility
- an opportunity for interactive questions and answers with the person conducting the training session.

Training materials for this facility are available from the Business Manager.

Record Keeping

Training records – Training records will be completed at each training. These documents will be kept in Region 8 Business Office. The records will include:

- Date of the training session
- The contents or summary of the training session
- The names and qualifications of persons conducting the training
- The names and job titles of all persons attending the training session

Employee training records are provided upon request to the employee or the employee's authorized representative within 15 working days. Such requests should be addressed to the Director.

Medical records – Medical records are maintained for each employee with occupational exposure in accordance with 29 CFR 1910.20 "Access to Employee Exposure and Medical Records."

The Director is responsible for maintenance of the required medical records. These confidential records are kept in the Business Office for at least the duration of employment plus 30 years.

Employee medical records are provided within 15 working days upon request of the employee or to anyone having written consent of the employee. Such requests will be sent to the Director.

OSHA Record Keeping – An exposure incident is evaluated to determine if the case meets OSHA's Record Keeping requirements (29 CFR 1904). This determination and the recording activities are done by the Director/designee.

Sharps Injury Log

In addition to the 1904 Recordkeeping Requirements, all injuries from contaminated sharps are also recorded in a Sharps Injury Log. All incidences must include at least:

- date of the injury
- type and brand of the device involved (**syringe, suture needle**)
- department or work area where the incident occurred
- explanation of how the incident occurred.

This log is reviewed as part of the annual program evaluation and maintained for at least five years following the end of the calendar year covered. If a copy is requested by anyone, it must have any personal identifiers removed from the report.

Legal Reference: Federal Occupational Safety and Health Administration (OSHA)
Standard (Title 29, Part 1910.1030)

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