

**WEST DELAWARE COUNTY COMMUNITY  
SCHOOL DISTRICT**

**EXPOSURE CONTROL PLAN FOR  
BLOODBORNE PATHOGENS**

# Exposure Control Plan Policy

The West Delaware County Community School District is committed to providing a safe and healthful work environment for our entire staff. 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 and 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.

Facility Name: West Delaware County Community School District

Prepared By: Superintendent, School Nurse, and Director of Buildings, Grounds and Transportation

Date: September 1, 2016

Reviewed/Revised: September 17, 2018; July 24, 2019; August 12, 2021; June 6, 2022

## **Program Administration**

1. The Superintendent, the School Nurse, and the Director of Buildings, Grounds and Transportation are responsible for implementation of the Exposure Control Plan (ECP). The Superintendent 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: West Delaware Central Office 563-927-3515, extension 401.
2. 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.
3. The School Nurse and the Buildings, Grounds and Transportation Director 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 and will ensure that adequate supplies of the aforementioned equipment are available the appropriate sizes.

Contact location/phone number: School Nurse 563-927-3515, extension 206

Director of Buildings, Grounds & Transportation 563-927-3515, extension 410

4. The Superintendent and the School Nurse 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: West Delaware Central Office 563-927-3515, extension 401.

5. The Superintendent and the School Nurse will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives.

Contact location/phone number: West Delaware Central Office 563-927-3515, extension 401

School Nurse 563-927-3515, extension 206

## Employee Exposure Determination

The following table lists job classifications in our School District in which employees have occupational exposure, (contact with blood and other infectious materials):

**Table A**

<b>Job Title</b>	<b>Department/Location</b>	<b>Task/Procedure</b>
Nurses, including Health Services Associate	Health Services/School District Health Offices	May include: General first aid, wound treatment and dressings, foreign body removal, injections, hemoglobin testing, glucose monitoring, catheterizations, assisting students with life skills, bathroom assistance, catheterizations, CPR

The following table lists job classifications in our School District in which employees may have occupational exposure, (contact with blood and other infectious materials):

**Table B**

<b>Job Title</b>	<b>Department/Location</b>	<b>Task/Procedure</b>
School Administrators	District Schools	First Aid in the absence of the school nurse
Professional Staff, Paraprofessional Staff , Secretarial Staff	District Schools	May be exposed in a classroom/office situation
Custodial/Maintenance Staff	Sites and Facilities/District Schools and Facilities	Cleaning of body fluids and/or materials containing blood and infectious materials
Physical Education Teachers	District Schools	First Aid
Special Education Teachers and Special Education Paraprofessional Staff	District Schools	Bathroom assistance, diapering, assisting students with life skills
Coaches/Athletic Trainer	District Schools	First Aid
Secondary Health Team Members, (staff trained in CPR and/or First Aid who can assist in the absence of the nurse)	District Schools	First Aid, CPR if called upon to assist

Part time, temporary, contract, and per diem employees are covered by the Bloodborne Pathogens Standard. The Superintendent and/or her designee will determine the employee's classification and notify the employee of the requirement for Blood Borne Pathogens training.

## **METHODS OF IMPLEMENTATION AND CONTROL**

### **1. Universal Precautions:**

**Date Instituted: See Review Date**

All employees will utilize universal precautions

### **2. Exposure Control Plan**

**Date Instituted: See Review Date**

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 can review this plan at any time during their work hours by contacting the Superintendent or School Nurse. The Exposure Control Plan will also be available on the school district's website under the Staff tab. If requested, the West Delaware County Community school District will provide an employee with a copy of the ECP free of charge and within 15 days of the request.

The Superintendent, the School Nurse, and the Buildings, Grounds and Transportation Director are 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.

### **3. Engineering Controls and Work Practices**

**Date Instituted: See Review Date**

Engineering controls 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:

- Protective equipment shall be provided, used and maintained in a sanitary and reliable condition.
- Protective equipment shall include gloves of appropriate material and size.
- Employees shall use gloves at all times whenever there is a possible exposure to body fluids.
- Employees shall use gloves if skin is cracked, chapped or if any form of dermatitis is present.
- Employees shall use gloves during the cleaning of body fluids.
- General purpose gloves may be used for housekeeping chores.

- For those who, as part of their job description may need to perform CPR, micro shield masks with one way valves will be provided.
- Proper precautions shall be taken while cleaning rooms, hallways and blood spills.
- Chemical germicides that are approved for use as hospital disinfectants and are tuberculocidal when used at recommended dilutions shall be used to decontaminate spills of blood and other body fluids.
- All sweepings, solid or liquid wastes, refuse or garbage, shall be removed in such a manner as to avoid creating a health threat.
- Sharp instruments and disposable items such as needles should be placed in puncture resistant labeled containers for disposal. Sharp disposal containers are inspected and maintained or replaced by the Health Services Coordinator/Nurse whenever necessary to prevent overfilling.
- Receptacles shall be lined and bags containing potentially infectious material shall be disposed in an appropriate manner.
- Hepatitis B Vaccine: All employees who will have contact with blood and other infectious materials will be provided with the Hepatitis B vaccine at no cost. Employees who may have the potential for blood borne pathogens exposure will be in-serviced on universal precautions and if an exposure transpires, will be referred to Regional Medical Center for evaluation and treatment.
- Hand washing is required and should be in a readily accessible location. The following guidelines apply to hand washing and hand washing facilities:
  - a) Employees must have hand washing facilities located at a reasonable distance from their normal work area.
  - b) Employees must be instructed to wash their hands and other skin surfaces with soap and tepid water as soon as possible after exposure to blood or body fluids to adequately flush contaminated material from skin.
  - c) Employees must be instructed to wash their hands immediately or as soon as feasible after removal of gloves or other personal protective equipment.
- West Delaware County Community School District recognizes the need for revisions in engineering control and work practices through review of OSHA records and the district's Safety Committee activities.
- The School Nurse and the Director of Buildings, Grounds and Transportation will be responsible for reviewing literature, supplier information and attending any professional development sessions as necessary in order to provide the School District Safety Committee with new and effective procedures and protocols and product information for consideration and implementation.

- The Superintendent will ensure effective implementation of committee recommendations.

#### **4. Personal Protective Equipment**

**Date Instituted: See Review Date**

- Personal Protective Equipment, (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 School Nurse or Director of Buildings and Grounds. Training for the custodial/maintenance is provided through the Director Buildings, Grounds and Transportation.
- Resuscitation/respiratory devices should be readily available and accessible to employees who can be reasonably expected to resuscitate a person. Emergency ventilation devices fall under the scope of personal protective equipment. A one way valved mask is available and stored with each AED in the West Delaware district buildings.
- Personal protective equipment is located in School District Health Offices and at Sites and Facilities. PPE may be obtained through the School Nurse, or through the Director of Buildings, Grounds and Transportation. School District employees may request personal protective equipment through a verbal or written request.
- All employees using personal protective equipment must observe the following precautions:
  - a. Wash hands immediately or as soon as feasible after removal of gloves or other personal protective equipment
  - b. Remove personal protective equipment after it becomes contaminated and before leaving the work area
  - c. Used personal protective equipment is disposed of by the custodian in a double bag and disposed with regular trash
  - d. Wear appropriate gloves when it can be reasonably anticipated that there may be hand contact with blood or other potentially infectious material and when handling or touching contaminated items or surfaces
  - e. Replace gloves if torn, punctured, contaminated, or if their ability to function as a barrier is compromised.
  - f. Never wash or decontaminate disposable gloves for reuse.
  - g. Wear appropriate face and eye protection when splashes, sprays, spatters, or droplets of blood or other potentially infectious material pose a hazard to the eye, nose or mouth.
  - h. Remove immediately, or as soon as feasible, any garment contaminated by blood or other potentially infectious material in such a way as to avoid contact with the outer surface.

## **5. Housekeeping**

**Date Instituted: See Review Date**

### **A. Handling and Disposal of Sharps**

- Sharps means anything which can penetrate the skin, including needles, broken glass, and exposed ends of dental wires.
- Shearing or breaking of contaminated sharps is prohibited. Recapping, bending, or removing needles is permissible only if there is no feasible alternative or if such actions are required for a specific medical or dental procedure. If recapping, bending, or removal is necessary, removal or recapping must be done by either a one handed scooping (passive recapping) or through a recapping device.
- A one-handed “scoop” technique uses the needle itself to pick up the cap, and then the cap is pushed against a hard surface to ensure a tight fit onto the device. Also, the cap may be held with tongs or forceps and placed over the needle.
- Contaminated broken glass must not be picked up by hand, but must be cleaned up using mechanical means, such as a brush and dust pan, tongs, or forceps. 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 red to warn everyone that the contents are hazardous.
- Containers for disposable sharps must be closable (that is, have a lid, flap, door, or other means of closing the container), and they must be kept upright to keep the sharps and any liquids from spilling out of the container. Sharps containers, (red hard plastic biohazard container), are located in every health office.
- The containers must be replaced routinely and not be overfilled, which can increase the risk of needlesticks or cuts. Sharps disposal containers that are reusable must not be opened, emptied, or cleaned manually or in any other manner that would expose workers to the risk of sharps injury.
- Disposal of Sharps containers for the West Delaware Schools is arranged by the District Nurse as needed through Stericycle or local pharmacies.
- Broken glassware that may be contaminated is only picked up using mechanical means, such as a brush and dustpan.



## B. Regulated Waste

**Date Instituted: See Review Date**

Regulated waste requires special handling and must be placed in appropriate containers.

Regulated waste includes the following:

- 1) liquid or semi-liquid blood or other potentially infectious material,
  - 2) items contaminated with blood or other potentially infectious material that would release these substances in a liquid or semi-liquid state if compressed,
  - 3) items that are caked with blood or other potentially infectious material and are capable of releasing these materials during handling,
  - 4) contaminated sharp, and pathologic and microbiological wastes containing blood or other potentially infectious material.
- The containers into which regulated waste is stored, transported or shipped must be closeable.
- The container must also be constructed so as to contain the waste and prevent leakage of its contents. If the waste could puncture the primary container, the primary container must be placed into a puncture-resistant container. If outside contamination of the primary container occurs, the primary container must also be placed within a second container which prevents leakage. For containment requirements of sharps, see the section “Handling and Disposal of Sharps” on page 8.

Indicated below are the types of regulated waste which you use in your facility (e.g., gloves, gowns, soiled laundry, gauze/bandages), the type of containers in which the waste is disposed and the label placed on each container. Red bags identified for biohazard waste are available if needed and disposal is through a call to Stericycle by the School Nurse or Director of Buildings, Grounds & Transportation. Red bags are not routinely used.

<u>WASTE</u>	<u>LOCATION</u>	<u>CONTAINERS</u>	<u>LABEL</u>
Gloves	Buildings	Double Plastic Bagging	None
Gauze/Bandages	Buildings	Double Plastic Bagging	None
Diapers/Urine/Feces	Buildings	Double Plastic Bagging	None
Emesis	Buildings	Double Plastic Bagging	None

## **6. Eating, Drinking, Applying Cosmetics**

**Date Instituted: See Review Date**

- All district buildings are smoke free.
- Eating, drinking, and/or applying cosmetics or lip balm and handling contact lenses are prohibited in the work areas where there is any risk of occupational exposure. Food and drink shall not be kept in refrigerators, freezers, shelves, cabinets or on countertops where blood and other potentially infectious materials are present.

## **7. Housekeeping**

**Date Instituted: See Review Date**

Facilities must be maintained in a clear and sanitary condition. The schedule which sets forth the manner in which and time when areas in the facility are cleaned and disinfected is maintained by the Director of Buildings, Grounds & Transportation.

- a) Work surfaces must be decontaminated with an appropriate disinfectant after completion of procedures, immediately when overtly contaminated, after any spill of blood or other potentially infectious materials and at the end of the work shifts when surfaces have become contaminated since the last cleaning.
- b) Reusable receptacles, such as bins, pails, and cans that have likelihood for becoming contaminated must be inspected and decontaminated on a regular basis. When contamination is visible, receptacles should be cleaned and decontaminated immediately or as soon as feasible.
- c) Broken glassware which may be contaminated must not be picked up directly with the hands. Tools which are used in the clean-up of broken glass must be decontaminated or discarded after use and the broken glass should be placed in a sharps container. Vacuum cleaners are not appropriate for clean-up of contaminated broken glass.
- d) Contaminated laundry must be placed and transported in bags or containers labeled appropriately. All employees who have contact with contaminated laundry must wear protective gloves and other appropriate personal protective equipment.

## **8. Hepatitis B Vaccination**

**Date Instituted: See Review Date**

- The West Delaware School Nurse will provide training to employees with occupational exposure on Hepatitis B vaccinations, addressing safety, benefits, efficacy, methods of administration, and availability. This will occur annually with Bloodborne Pathogens training.
- The Hepatitis B vaccination series is available at no cost after initial employee training and within 10 days of initial assignment to all employees identified in the exposure determination section of this plan. 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 vaccination is contraindicated.

- 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. See Appendix A.
- Documentation of refusal of the vaccination is kept at Human Resources at the West Delaware Central Office.
- Vaccination will be provided by the Regional Medical Center located at: 709 W. Main Street, Manchester, Iowa 52057, 563-927-3232.
- Following a medical evaluation, a copy of the health care professional's written opinion will be obtained and provided to the employee within 15 days of the completion of the evaluation. It will be limited to whether the employee requires the hepatitis vaccine and whether the vaccine was administered.

## **9. Post-Exposure Evaluation and Follow-Up**

### **Date Instituted: See Review Date**

- Should an exposure incident occur, immediately contact the building administrator and the School Nurse at (563) 927-3515 extension 206.
- An immediately available confidential medical evaluation and follow-up will be conducted by the School Nurse or Regional Medical Center at no cost to the employee.
- Following initial first aid (clean the wound, flush eyes or other mucous membrane, etc.), the following activities will be performed:
  - a) Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).
  - b) 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.
  - c) If the source individual is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.
  - d) After obtaining consent, collect exposed employee's blood as soon as feasible after exposure incident and test blood for HBV and HIV serological status. If the employee does not give consent for HIV serological testing during collection of blood for baseline testing, preserve the baseline blood sample for at least 90 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.
  - e) Assure that the exposed employee is provided with the source individual's test results and with information about applicable disclosure laws and regulations concerning the identity

and infectious status of the source individual (e.g., laws protecting confidentiality).

#### **10. Administration of Post-Exposure Evaluation and Follow-Up**

**Date Instituted: See Review Date**

- West Delaware County Community Schools 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 OSHA's bloodborne pathogens standard.
- Department of Human Resources ensures that the healthcare professional evaluating an employee after an exposure incident receives the following:
  - a) A description of the employee's job duties relevant to the exposure incident
  - b) Route(s) of exposure
  - c) Circumstances of exposure
  - d) If possible, results of the source individual's blood test and relevant employee medical records, including vaccination status
- The West Delaware Central Office provides the employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

#### **11. Procedure for Evaluating the Circumstances Surrounding an Exposure Incident**

**Date Instituted: See Review Date**

- The School Nurse, the Superintendent, and the Director of Buildings, Grounds, and Transportation will review the circumstances of all exposure incidents to determine:
  - a) Engineering controls in use at the time
  - b) Work practices followed
  - c) A description of the device being used (including type and brand)
  - d) Protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)
  - e) Location of the incident
  - f) Procedure being performed when the incident occurred
  - g) Employee training
- The School Nurse will record all percutaneous injuries from contaminated sharps in a Sharps Injury Log.
- If revisions to this ECP are necessary, the School Nurse, the Superintendent, and/or the Director of Buildings, Grounds & Transportation will ensure that appropriate changes are made.

## **12. Employee Training**

**Date Instituted: See Review Date**

- All employees who have occupational exposure to bloodborne pathogens receive initial and annual training conducted by the School Nurse; Director of Buildings, Grounds and Transportation; or approved online course.
- 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:
  - 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 at every School Health Office and with the School Nurse.

## **13. Recordkeeping**

**Date Instituted: See Review Date**

### **Training Records:**

Training records are completed for each employee upon completion of training. These documents will be kept for at least three years either electronically through the AEA online training system or in West Delaware Central Office personnel files.

The training records include:

- a. The dates of the training sessions
- b. The contents or a summary of the training sessions
- c. The names and qualifications of persons conducting the training
- d. The names and job titles of all persons attending the training sessions

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 West Delaware Central Office.

#### **14. Medical Records**

**Date Instituted: See Review Date**

- 1 Medical records are maintained for each employee with occupational exposure in accordance with 29 *CFR* 1910.1020, "Access to Employee Exposure and Medical Records."
- 2 The School Nurse and/or Central Office Secretary is responsible for maintenance of the required medical records. These confidential records are kept in the West Delaware Central Office for at least the duration of employment plus 30 years.
- 3 Employee medical records are provided upon request of the employee or to anyone having written consent of the employee within 15 working days. Such requests should be sent to:

West Delaware Central Office, 701 New Street, Manchester IA 52057

#### **15. OSHA Recordkeeping**

**Date Instituted: See Review Date**

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 School Nurse and the Superintendent.

#### **16. Sharps Injury Log**

**Date Instituted: See Review Date**

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

- a) Date of the injury
- b) Type and brand of the device involved (syringe, suture needle)
- c) Department or work area where the incident occurred
- d) Explanation of how the incident occurred.
- e) 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.
- f) If a copy is requested by anyone, it must have any personal identifiers removed from the report

## **Appendix A**

### **HEPATITIS B VACCINE DECLINATION**

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.

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Employee Signature

Date

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Print Name

## **Appendix B**

### **West Delaware County Community School Contact Information**

Superintendent of Schools

Dr. Kristen Rickey

West Delaware Central Office

701 New Street, Manchester, IA 52057

563-927-3515, extension 401

Director of Buildings, Grounds and Transportation

Gary Fonck

West Delaware Vehicle Maintenance and Storage Facility

1145 Grand Avenue. Manchester, IA 52057

563-927-3515, extension 410

School Nurse

Chelsey Pangburn

West Delaware Middle School

1101 Doctor Street, Manchester, IA 52057

563-927-3515, extension 206