

Davis Technical College

Bloodborne Pathogen

Exposure Control Plan



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BLOODBORNE PATHOGEN EXPOSURE CONTROL PLAN		
Subject: Introduction to Exposure Control Plan		

INTRODUCTION TO EXPOSURE CONTROL PLAN

Davis Technical College (“Davis Tech”) is committed to providing a safe and healthful work environment for entire staff and students. In pursuit of this goal, the following bloodborne pathogen exposure control plan¹ (“ECP”) is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance 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 Davis Tech in implementing and ensuring compliance with the standard, thereby protecting our employees and students. 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
- Procedures for evaluating circumstances surrounding exposure incidents Implementation methods for these elements of the standard are discussed in the subsequent pages of this ECP.

¹ Each individual department’s budget covers the cost for all supplies to prevent bloodborne pathogen exposure, medical expenses, and Workers Compensation claims.



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Subject: First Aid		

FIRST AID

- Allow affected area to bleed freely.
- Wash the affected area thoroughly with soap and water.
- Flush splashes to nose, mouth, and skin with water.
- Use eyewash stations, saline, or sterile wash to flush the eyes.
- Immediately report the incident to receive follow-up care.



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Subject: Program Administration		

PROGRAM ADMINISTRATION

Davis Tech’s Safety and Risk Manager will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures.

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.

Each exposing department 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. Those exposing departments will ensure that adequate supplies of the equipment are available in the appropriate sizes. Each exposing department will also be responsible for training, documentation of training, and making the written ECP available to employees. The Safety and Risk manager will conduct annual audits to ensure compliance.

Contact location/phone number:

Department	Location	Name	Phone	Email
Safety and Risk	Main Building - 2036	Jeremy Jeppson	801-593-2125	jeremy.jeppson@davistech.edu
Custodial	Main Building - 1023	Jim Mikkelsen	801-593-2308	jim.mikkelsen@davistech.edu



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Contact location/phone number cont.:

Practical Nursing	Health Building -	Jodie Buttars	801-593-2350	jodie.buttars@davistech.edu
Health Professions	Health Building - 118	Dee Weaver	801-593-2369	dee.weaver@davistech.edu
Service Professions	Main Building - 1014	Amanda Hollingsworth	801-593-2476	amanda.hollingsworth@davistech.edu
Service Professions	Main Building - 1014	Marlee Patterson	801-593-2431	marlee.patterson@davistech.edu

Due to the potential medical treatments and demand for confidentiality, human resources will ensure that all medical actions required by the standard are performed and that appropriate employee health and OSHA records are maintained.

Contact location/phone number:

Name	Location	Phone	Email
Scott Hoffman	Main Building - 1081	801-593-2393	scott.hoffman@davistech.edu



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Subject: Student Exposure		

STUDENT/VOLUNTEER EXPOSURE

Students and volunteers are not employees and are not regulated by [OSHA standards](#). A standard interpretation from OSHA to Merlyn C. Bartlet, dated March 5, 1999, states in part:

The Occupational Safety and Health Act of 1970 extends only to employees of an organization. Students volunteering and/or learning in a state or regional hospital or other healthcare institution are not covered by OSHA regulations. High school, college, or professional nursing students are also not considered employees of the hospital.

Utah State Code 34A-6-103(1)(e) defines and employee as:

“Employee” includes any person suffered or permitted to work by an employer.

Davis Tech will follow the same ECP to prevent student and volunteer (as defined in Utah Code Title 67 Chapter 20) exposure to bloodborne pathogens. The difference will be in medical treatment, reporting, and recordkeeping.

If a student is exposed to bloodborne pathogens in a classroom setting, then that student should seek medical attention at their own preferred provider. Volunteers exposed in classroom settings are covered under Davis Tech’s Worker’s Compensation Insurance.



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Subject: Student Exposure		

If the exposure occurs in a clinical setting, or during an externship, then Davis Tech will file a claim through Davis Tech’s Worker’s Compensation provider and allow the student or volunteer to seek medical treatment through Davis Tech’s provider network.

An incident involving a student or volunteer will not be recorded on Davis Tech’s OSHA 300 logs, Davis Tech’s needlestick or sharps injury log, and will not be reported to Utah Occupational Safety and Health (“UOSH”).

Some students are also employees of Davis Tech. For example: a practical nursing student may work part-time as a custodian. If a student-employee is exposed while acting as an employee, then Davis Tech’s full ECP applies.

Part-time, temporary, contract and per diem employees are covered by the bloodborne pathogens standard and this ECP.



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Subject: Employee Exposure Determination		

EMPLOYEE EXPOSURE DETERMINATION

The following is a list of all job classifications at our establishment in which all employees have occupational exposure:

Job Title	Department
Safety and Risk Manager	Safety and Risk
Security Risk Management Coordinator	Safety and Risk
Security Specialist	Safety and Risk
Custodial Supervisor	Facilities
Custodian	Facilities
Medical Assistant Instructor	Allied Health
Dental Assistant Instructor	Allied Health
Phlebotomy Instructor	Allied Health
Surgical Tech Instructor	Allied Health
Fire/EMS Instructor	Allied Health
Pharmacy Technician Instructor	Allied Health
Practical Nursing	Allied Health
Dental Volunteers	Allied Health
Esthetics Instructors	Services
Culinary Instructors	Services



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Subject: Employee Exposure Determination		

The following is a list of job classifications in which some employees at our establishment have occupational exposure. Included is a list of tasks and procedures, or groups of closely related tasks and procedures, in which occupational exposure may occur for these individuals:

Job Classification	Hazardous Task/Procedure
All	First Aid
All	CPR
Custodial	Blood Cleanup
Custodial	Handling regulated waste
Medical and Dental Instructor	Placing and removing IVs, phlebotomy, injections, laboratory procedures, surgical technician practical laboratories, disposal of regulated waste
Dental Volunteers	Dental procedures including injections and disposal of regulated waste.
Practical Nursing Instructors	Placing intramuscular injections
Esthetics Instructors	Microderm and extraction
Culinary Instructors	Cutting and dicing food products, cleaning sharp objects



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Subject: Methods of Implementation and Control		

METHODS OF IMPLEMENTATION AND CONTROL

Universal Precautions

All employees will utilize universal precautions by wearing personal protective equipment which at a minimum consists of gloves, but may also include gowns, face shields, masks, among other items. Additionally, employees will receive regular safety training.

Exposure Control Plan

Employees covered by the bloodborne pathogen standard receive an explanation of this ECP during their initial training session and will be reviewed in their annual refresher training. All employees can review this plan at any time during their work shifts by contacting any of the exposing departments supervisors, or going to Davis Tech's iSite webpage.

If requested, Davis Tech will provide an employee with a copy of the ECP free of charge and within 15 days of the request. The Safety and Risk Manager 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.



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Engineering Controls and Work Practices

Engineering controls, work practice controls, and training as needed but no less than annually, will be used to prevent or minimize exposure to bloodborne pathogens. The specific engineering controls and work practice controls used are listed below:

Job Classification	Engineering Controls and Work Practices
Security and Risk	Minimize any physical contact with another person.
Custodians	Will not place hands or other body parts into receptacle bins.
Medical and Dental Instructors	Use disposable tools and place into biohazard sharps container. Use caution and brushes with long handles while cleaning non-disposable tools. Use autoclave to clean non-disposable tools.
Practical Nursing Instructors	Use one handed recap technique prior to use and safety needles. Use disposable tools and place into biohazard sharps container.
Esthetics	Use sharps container for disposable products and disinfect reusable tools.

Sharps disposal containers are inspected daily and maintained or replaced by instructors whenever necessary to prevent overfilling. The safety and risk manager will inspect the containers for compliance as needed, but no less than annually.



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Davis Tech identifies the need for changes in engineering controls and work practices through regular review of OSHA standards, employee interviews, and participation in safety committee.

Davis Tech will evaluate new procedures and new products regularly by reviewing Center for Disease Control guidelines, medical journals, industry standards, as well as through employee credentialing, accrediting, and actively participating in various medical and dental associations. Davis Tech also evaluates best practices as recommended by EBSCO and Dynamic Health.

Both front-line workers and management officials are involved in this process in the following manner: involvement in the yearly evaluation of this ECP, review of all exposure incidents, reporting and evaluating near misses, and ensuring compliance with the Clinical Lab Improvement Amendment (“CLIA”).

The Safety and Risk Manager is responsible for ensuring that these recommendations are implemented.



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Subject: Personal Protective Equipment		

PERSONAL PROTECTIVE EQUIPMENT

Personal Protective Equipment (“PPE”) is provided at no cost to Davis Tech employees. Regular training, occurring no less than every twelve months, in the use of the appropriate PPE for specific tasks or procedures is provided by both online resources such as Bridge and by the Safety and Risk Manager.

The types of PPE available to employees are as follows:

Job Classification	PPE
Security and Risk	Disposable gloves
Custodians	Disposable gloves
Medical and Dental Instructors	Disposable gloves, gowns, masks, hair covers, face shields, and eye wear.
Nursing Instructors	Disposable gloves, gowns, masks, hair covers, face shields, and eye wear.
Esthetics	Disposable gloves.

PPE is located in several storage closets throughout campus and may be obtained through any instructor. Each instructor is responsible to ensure that storage closets are well stocked with any personal protective equipment that might be required by employees.



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Subject: Personal Protective Equipment		

All employees using PPE must observe the following precautions:

- Wash hands immediately or as soon as feasible after removing gloves or other PPE.
- Remove PPE after it becomes contaminated and before leaving the work area.
- Used PPE may be disposed of in any biohazard container if contaminated. If not contaminated used PPE may be disposed of in any trash receptacle.
- Wear appropriate gloves when it is reasonably anticipated that there may be hand contact with blood or OPIM, 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.
- 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.
- Never wash or decontaminate disposable gloves for reuse.
- 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.
- 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.



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Subject: Housekeeping		

HOUSEKEEPING

Regulated waste is placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded (see the following section “Labels”), and closed prior to removal to prevent spillage or protrusion of contents during handling.

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. New sharps disposal containers are available in the medical, practical nursing, and esthetics storage rooms in the Allied Health and Main Building.

Bins and pails (e.g., wash or emesis basins) are cleaned and decontaminated as soon as feasible after visible contamination.

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

The procedure for handling sharps disposal containers is:

- Never allow the sharps container to pass the “full” line.
- Never attempt to remove anything from the sharps container.
- Once filled, place the container top side up into a biohazard collection pale.



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Subject: Housekeeping		

The procedure for handling other regulated waste is:

- Ensure all regulated waste is disposed of in red bags and/or clearly marked with the biohazard label.
- Never allow the regulated waste containers to overfill.
- Never place any part of the body in the regulated waste containers.
- Once filled, remove the waste bag and tie a spill proof knot in the top of the bag.
- Take the bag to the biohazard collection pales and place the biohazard bag into the collection pale.



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Subject: Laundry		

LAUNDRY

Davis Tech does not create contaminated laundry. Nor does Davis Tech transport any contaminated laundry into any Davis Tech facilities. There is no need to wash any contaminated laundry.

Employees, students, and volunteers exposed to contaminated laundry at externship and clinical sites will follow the bloodborne pathogen program of that specific facility.



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Subject: Labels		

LABELS

All regulated waste and sharps containers shall be marked with a biohazard label and symbol and placed in a red bag or container.

No regulated waste or contaminated equipment shall be brought into Davis Tech's facilities from any off-campus location.

Employees are to notify the Safety and Risk Manager if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc., without proper labels.



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Subject: Hepatitis B Vaccination		

HEPATITIS B VACCINATION

The Safety and Risk Manager will provide training to employees on hepatitis B vaccinations, addressing safety, benefits, efficacy, methods of administration, and availability.

The hepatitis B vaccination series is available at no cost after initial employee training and offered 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.

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 to the employee. Documentation of refusal of the vaccination is kept with the employees personnel file in the human resource office.

Vaccinations will be provided by:

[WorkMed](#), 2075 University Park Blvd, Layton, Utah 84041 – 801-776-4444

Following the 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.



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Subject: Post-Exposure Evaluation and Follow-Up		

POST-EXPOSURE EVALUATION AND FOLLOW-UP

Should an exposure incident occur, contact human resources at the number listed below:

Name	Location	Phone	Email
Scott Hoffman	Main Building - 1081	801-593-2393	scott.hoffman@davistech.edu

An immediately available confidential medical evaluation and follow-up will be conducted by WorkMed, or the employees preferred medical provider.

Following initial first aid (see page 3.), the following activities will be performed:

- Document the routes of exposure and how the exposure occurred.
- Identify and document the source individual (unless Davis Tech can establish that identification is infeasible or prohibited by state or local law).
- Obtain consent, 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.
- 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 source individual is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.
- 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).



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Subject: Post-Exposure Evaluation and Follow-Up		

- 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.



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Subject: Administration of Post-Exposure Evaluation and Follow-Up		

ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

Davis Tech's Human Resource Department 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 and that the health care 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
- If possible, results of the source individual's blood test

Davis Tech's Human Resource Department will provide the employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.



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Subject: Procedures for Evaluating Exposure Incidents		

PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

The Safety and Risk Manager 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 or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)
- Location of the incident (O.R., E.R., patient room, etc.)
- Procedure being performed when the incident occurred
- Employee's training

Davis Tech's Human Resource Department will record all percutaneous injuries from contaminated sharps in a Sharps Injury Log without identifying the employee.

If revisions to this ECP are necessary the Safety and Risk Manager will ensure that appropriate changes are made.



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Subject: Employee Training		

EMPLOYEE TRAINING

All employees who have occupational exposure to bloodborne pathogens receive initial and annual training conducted by the Safety and Risk Manager.

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 Davis Tech's 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, proper 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



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Subject: Employee Training		

- 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 the Safety and Risk Management office.



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Subject: Recordkeeping		

TRAINING RECORDS

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 Safety and Risk Management office. The training records include:

- Training completed through Bridge.
- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- 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:

Davis Technical College, Safety and Risk, 550 East 300 South, Kaysville, Utah 84037.



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Subject: Recordkeeping		

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 Davis Tech's Human Resource and Safety Management offices.

- NOTE - 29 CFR 1904 reporting requirements only apply to employees of Davis Tech. Students and volunteers are not considered employees of Davis Tech, even while completing externships or clinicals as part of their studies. An employee/employer relationship does not exist between Davis Tech and students.



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Subject: Recordkeeping		

SHARPS INJURY LOG

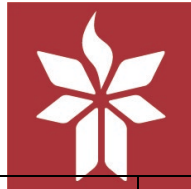
In addition to the 29 CFR 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in a Sharps Injury Log. All incidences must include at least:

- 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.

- NOTE - The Sharps Injury Log does not pertain to students and volunteers of Davis Tech because there is not an employee/employer relationship.

A template of a sharps injury log is found on the next page.

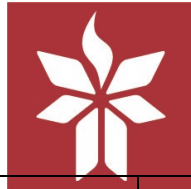


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Subject: Recordkeeping		

SHARPS INJURY LOG TEMPLATE

Date	Time	Type/Brand/Model of Device	Department/Work Area	Describe how the incident occurred

Per OSHA requirements, sharps injury logs must be saved for five years following the end of the calendar year that these records cover.



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Subject: Medical Records		

MEDICAL RECORDS

Medical records are maintained for each employee with occupational exposure in accordance with 29 CFR 1910.1020, "Access to Employee Exposure and Medical Records." Davis Tech's Human Resource Office is responsible for maintenance of the required medical records. These confidential records are kept in Davis Tech's Human Resources vault 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. Such requests should be sent to:

Davis Technical College, Human Resources, 550 East 300 South, Kaysville, Utah 84037.



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Subject: Hepatitis B Vaccine Declination		

Employee Acceptance / Declination of Hepatitis B Vaccination

Name _____ Job Title _____

Fiscal Year _____

_____ **Hepatitis B Vaccine Acceptance**

Hepatitis B virus typically causes a clinical illness with jaundice; it may also produce a sub-clinical infection. In either case, complications can occur, including persistence of infection, chronic carrier state, cirrhosis, and liver cancer. Hepatitis B virus is transmitted principally through contaminated body fluids, (especially blood) skin, or mucosa; therefore, the likelihood of contracting the disease is greater for individuals (e.g. nurses, athletic trainers) coming in frequent contact with blood or blood products.

I understand that a vaccine for Hepatitis B is available and is being offered by my employer at no charge to me. This vaccine, when administered in three doses over a six- month period, has been shown to be highly effective in providing protection against Hepatitis B infection. It has rarely produced serious side effects. I certify that I am not pregnant, nor am I a mother nursing a child with breast milk, and I have been given information regarding Hepatitis B vaccine and the opportunity to have questions answered.

I agree to release my employer from any liability related to the administration of this vaccine.

Signature Date Witness Date

Dates of Vaccination: _____



Employee Acceptance / Declination of Hepatitis B Vaccination Cont.

_____ **Hepatitis B Vaccine Declination**

I have received information from my employer about the Hepatitis B vaccine.

I understand that due to an 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 me. However, I decline the Hepatitis B vaccine 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 an 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.

Signature

Date

Witness

Date