

FRENCHTOWN BOROUGH BOARD OF EDUCATION
Frenchtown, New Jersey 08825
Board Approval 10/28/08
Readopted: March 28, 2017

FILE CODE: 5141

BLOODBORNE PATHOGENS

EXPOSURE CONTROL PLAN

AND

RECORDKEEPING FORMS

INSTRUCTIONS

The Frenchtown School District Exposure Control Plan is in compliance with the Bloodborne Pathogens Standard, OSHA, 29 Code Federal Regulation, 1910.1030, and the NJ PEOSH adoption N.J.A.C. 12:100-4.2. A central component of the Standard is the development of an Exposure Control Plan (ECP) tailored to individual worksites.

The plan includes the following elements:

- statement of employer policy
- designation of employees responsible for implementation of various plan elements
- determination of employee exposure
- implementation of various methods of exposure control, including:
 - universal precautions
 - engineering controls and work practices
 - personal protective equipment
 - training
 - Hepatitis B Vaccination
 - Post-Exposure evaluation and follow up
 - Housekeeping
 - Labeling
- Employer recordkeeping

Before proceeding to use this document, read the Bloodborne Pathogens Standard. After you have familiarized yourself with the standard, follow the control plan in the order in which it is presented, adding information specific to your worksite wherever indicated. The plan must be completed in its entirety to assure that the Exposure Control Plan complies with the NJ PEOSH Standard. You will note that in several places within the plan, it will be necessary for you to exercise judgement as to how you will proceed. Should you have any questions in this regard or need clarification or guidance on any other aspect of the plan, you may contact Glenda Grimes at 908-996-2751.

The Exposure Control Plan also contains forms that may be used to comply with recordkeeping requirements of the standard.

INTRODUCTION

Acquired Immunodeficiency Syndrome (AIDS) and Hepatitis B warrant serious concerns for workers occupationally exposed to blood and certain other body fluids that contain bloodborne pathogens. It is estimated that more than 5.6 million workers in health care and public safety occupations could be potentially exposed. In recognition of these potential hazards, the NJ Public Employees Occupational Safety and Health (PEOSH), the NJ Dept. of Health and the NJ Dept of Labor, have adopted the federal Bloodborne Pathogens Standard (CFR) 1910.1030 to help protect workers from these health hazards. The NJ Bloodborne Pathogens amendment to N.J.A.C. 12:100-4.2, became effective July 6, 1993. The amendment will become operative (90 days after the effective date of the amendment) October 4, 1993, with the following exceptions: (1) The exposure control plan required shall be completed on or before December 3, 1993, (2) the information, training and the recordkeeping shall become operative January 6, 1994, the rest of the standard's requirements become operative February 6, 1994.

The major intent of this regulation is to prevent the transmission of bloodborne diseases within potentially exposed workplace occupations. The standard is expected to reduce and prevent employee exposure to the Human Immunodeficiency Virus (HIV), Hepatitis B Virus (HBV) and other bloodborne diseases. The Occupational Safety and Health Administration (OSHA) estimates the standard could prevent more than 200 deaths and about 9,000 infections per year from HBV alone. The standard requires that employers follow universal precautions, which means that all blood or other potentially infectious material must be treated as being infectious for HIV and HBV. Each employer must determine the application of universal precautions by performing an employee exposure evaluation. If employee exposure is recognized, as defined by the standard, then the standard mandates a number of requirements. One of the major requirements is the development of an Exposure Control Plan, which mandates engineering controls, work practices, personal protective equipment, HBV vaccinations and training. The standard also mandates practices and procedures for housekeeping, medical evaluations, hazard communication, and recordkeeping.

POLICY

Frenchtown School is committed to provide a safe and healthful work environment for our entire staff. In pursuit of this endeavor, the following Exposure Control Plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with NJ PEOSH Bloodborne Pathogens Standard.

The ECP is a key document to assist our Township in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP includes:

1. Employee exposure determination
2. The procedures for evaluating the circumstances surrounding an exposure incident and
3. The schedule and method for implementing the specific sections of the standard, including:
 - Methods of compliance
 - Hepatitis B vaccination and post-exposure follow up
 - Training and communication of hazards to employees
 - Recordkeeping

PROGRAM ADMINISTRATION

- Chief School Administrator and School Nurse Is (are) responsible for the implementation of the ECP.
- School Nurse will maintain and update the written ECP at least annually and whenever necessary to include new or modified tasks and procedures.
- Those employers who are reasonably anticipated to have contact with or exposure to blood or other potentially infected materials are required to comply with the procedures and work practices outlined in this ECP.
- School Nurse and Plant Manager will have the responsibility for written housekeeping protocols and will ensure that effective disinfectants are purchased.
- School Nurse will be responsible for ensuring that all medical actions required are performed and that appropriate medical records are maintained.
- School Nurse and Plant Manager will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA and NJPEOSH representatives.
- School Nurse will maintain and provide all necessary personal protective equipment (PPE), engineering controls (i.e., sharp containers, etc.), labels and red bags as required by the standard.

- School Nurse and Plant Manager will ensure that adequate supplies of the aforementioned equipment are available.

****NOTE:** The names or Job Titles of the Program Administrators can be used to simplify compliance. The responsibilities for the program may be held by one individual. In this case these items can be combined.

- Utility gloves may be decontaminated for reuse if their integrity is not compromised. The decontamination procedure will consist of:

Disposable gloves will be used instead of utility gloves thus no need. Discard utility gloves when they show signs of cracking, peeling, tearing, puncturing, or deterioration.

- Never wash or decontaminate disposable gloves for reuse or before disposal.
- Wear appropriate face and eye protection such as a mask with glasses with solid side shields or a chin-length face shield when splashes, sprays, spatters, or droplets of blood or other potentially infectious materials pose a hazard to the eye, nose, or mouth.
- If a garment is penetrated by blood or and other potentially infectious materials, the garment(s) must be removed immediately or as soon as feasible. If a pullover scrub (as opposed to scrubs with snap closures) becomes minimally contaminated, employees should be trained to remove the pull-over scrub in such a way as to avoid contact with the outer surface; e.g., rolling up the garment as it is pulled toward the head for removal. However, if the amount of blood exposure is such that the blood penetrates the scrub and contaminates the inner surface, not only is it impossible to remove the scrub without exposure to blood, but the penetration itself would constitute exposure. It may be prudent to train employees to cut such a contaminated scrub to aid removal and prevent exposure to the face.
- Repair and/or replacement of PPE will be at no cost to employees.

TRAINING

All Employees who have or are reasonably anticipated to have occupational exposure to bloodborne pathogens will receive training conducted by January 6, 1994.

School Nurse will provide training on the epidemiology of bloodborne pathogen diseases. The training program will cover, at a medium, the following elements:

- A copy and expiration of the standard
- Epidemiology and symptoms of bloodborne pathogens

- Modes of transmission
- Our Exposure Control Plan and how to obtain a copy

HEPATITIS B VACCINATION

School Nurse will provide information on Hepatitis B vaccinations addressing its safety, benefits, efficacy, methods of administration and availability. A general overview of these considerations is given in Appendix L for review. The Hepatitis B vaccination series will be made available at no cost within 10 days of initial assignment to employees who have occupational exposure to blood or other potentially infectious materials unless:

- The employee has previously received the series
- Antibody testing reveals that the employee is immune
- Medical reasons prevent taking the vaccination; or
- The employee chooses not to participate

All employees are strongly encouraged to receive the Hepatitis B vaccination series. However, if an employee chooses to decline HBV vaccination, then the employee must sign a statement to this effect.

Employees who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the HBV vaccination (See Appendix C1) will be kept in Chief School Administrator and School Nurse's offices with the employees other medical records.

Vaccination administered in accordance with United States Public Health Service (USPHS) recommended protocol.

HBV vaccination booster doses must be available to employees if recommended by USPHS.

Appendix C is an optional form that may be used to record the employee vaccination series information.

****NOTE:** To ensure employees are aware of the importance of the Hepatitis B vaccination, it is necessary to thoroughly discuss the efficacy, safety, methods of administration, benefits of the vaccination, the fact that it is given at no cost, and during work hours.

RECORDKEEPING

Medical Records

Medical records are maintained for each employee with occupational exposure in

accordance with NJ PEOSH.

School Nurse is responsible for maintenance of the required medical records and they are kept at School Nurse's office plus a copy to Chief School Administrator.

NOTE: Refer to the Appendix Section for copies of applicable medical record forms.

The medical record will include:

- The name and social security number of employee;
- A copy of the employees Hepatitis B vaccinations and any medical records relative to the employee's ability to receive vaccination;
- A copy of all results of examinations, medical testing, and follow-up procedures as required by the standard;
- A copy of all healthcare professional's written opinion(s) as required by the standard.

All employee medical records will be kept confidential and will not be disclosed or reported without the employee's express written consent to any person within or outside the workplace except as required by the standard or as may be required by law.

Employee medical records shall be maintained for at least the duration of employment plus 30 years.

Employee medical record shall be provided upon request of the employee or to anyone having written consent of the employee within 15 working days.

Training Records

Bloodborne pathogen training records will be maintained by School Nurse at the Health Office.