

Exposure Control Plan  
Mountain Brook City Schools

Purpose:

The Mountain Brook City School System is committed to providing 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 blood borne pathogens.

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### **Program Administration**

Dr. Dale Wisely is responsible for the implementation of the ECP. The Administrative Team 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) will be instructed to comply with the procedures and work practices outlined in this ECP.

The school system nurse will make available all necessary personal protective equipment (PPE), engineering controls, labels and red bags as required by ADEM. The school system nurse will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes. Contact location/phone number: 205-802-4992.

Each School Administrator/ School Nurse will be responsible for training, documentation of training, and making the written ECP available to employees.

### **Employee Exposure Determination**

Definition:

**Occupational exposure-** reasonably anticipated skin, eye, mucous membrane, or parenteral (through the skin) contact with blood or other potentially infectious materials that may result from the performance of an employee's duties.

Job Title	Tasks/Risks
Administrators, Teachers, Coaches, Security Officers, Clerical Staff, Aides, and Bus Drivers	Providing assistance to students with bleeding or other potentially infectious materials injuries, CPR, and seizure precautions. Controlling combative behavior. Crisis management interventions.
Special Education Teachers and Aides	In addition to the responsibilities listed for teachers, toileting, feeding, changing menstrual pads, tooth brushing, cleaning nose and mouth secretions. Controlling combative behavior.
Speech Therapists	Cleaning nose and mouth secretions, biting, controlling combative behavior, delivering first aid. Controlling combative behavior.
Physical and Occupational Therapists	Assisting with tooth brushing, providing assistance to students with bleeding or other potentially infectious materials injuries, and controlling combative behavior.
Child nutrition personnel	Providing assistance to students with bleeding or other potentially infectious materials injuries.
Maintenance personnel	Maintaining and repairing equipment and facilities, including sewage lines and plumbing equipment, contaminated with potentially infectious materials and

	providing first aid.
Custodians	Cleaning spills and surfaces possibly containing blood and/or body fluids and disposing of garbage and waste materials containing potentially infectious body fluids. Cleaning sewage overflow
School Nurse	Providing nursing procedures such as administering injections; checking blood glucose; providing assistance to students with bleeding or other potentially infectious materials injuries, tracheostomy and catheter care; administering tube feedings, performing CPR and crisis management intervention.

**Methods of Implementation and Control**

**Standard Precautions:**

All employees will utilize standard precautions.

**Engineering Controls-** supplies and facilities needed to create a safe work environment.

1. Hand washing facilities (running water, soap and paper towels) or hand sanitizer will be readily accessible to employees and students.
2. Antiseptic hand cleaners will be provided when hand washing facilities are not available (field trips and school buses).
3. Puncture proof, disposable, labeled containers will be used to dispose of needles, syringes and sharps.
4. Disposable, single-use gloves will be provided to all staff, regardless of their potential for exposure.
5. CPR mouth shields will be provided to designated CPR responders, as well as office staff and school nurse.
6. Other personal, disposable, single-use protection equipment will be provided as required by specific tasks.
7. Appropriate disinfectants, supplies and equipment to clean surfaces and waste receptacles will be provided.
8. Disposable, plastic liners will be provided for waste receptacles, including those placed inside bathroom stalls.
9. School buses will be equipped with first aid and body fluid kits.

**Work Practice Controls-**behaviors employees adopt and practice that are necessary to create and maintain a safe work environment.

1. All employees will immediately wash their hands after removal of disposable gloves or other personal protection equipment; after assisting with toileting of students; and before handling food.
2. Protective equipment such as disposable gloves will be worn when handling any contaminated surface or body fluid and discarded after each use.
3. Contaminated needles, lancets and other sharps will not be recapped or bent.
4. All medical waste will be disposed of in compliance with the Medical Waste Plan.
5. Plastic liners will not be reused in waste receptacles once removed.

6. Employees will immediately report all exposure incidents to the principal. The principal will notify the parent/guardian of exposure incidents involving students.
7. Any disposable item contaminated with blood or other body fluids will be double bagged prior to discarding.

**Personal Protective Equipment:**

PPE will be made available to employees at no cost to them.

The types of PPE available to employees are as follows:

Gloves, eye protection, masks, plastic aprons, CPR masks.

PPE is located in each schools office and may be obtained through the School Nurse.

All employees using PPE must observe the following precautions:

- Wash hand immediately or as soon as feasible after removal of gloves or other PPE.
- Remove PPE after it becomes contaminated, and before leaving the work area.
- Used(contaminated) PPE may be disposed of in regular trash cans provided it is doubled bagged.
- Wear appropriate gloves when it can be reasonable 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, 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 appropriated 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.

**Housekeeping:**

Medical Waste will be stored and disposed of in accordance to the Medical Waste Management Plan.

Procedures for working around potentially infection material will be established and made available to all custodial and maintenance personnel.

**Hepatitis B Vaccination:**

Employees will be provided training on hepatitis B vaccinations, addressing the safety, benefits, efficacy, methods of administration and availability. Hepatitis B vaccine is currently recommended for healthcare workers and public-safety workers who have exposure to blood in the workplace, persons in training in schools of medicine, dentistry, nursing, laboratory technology and other allied health professions, by the Centers for Disease Control.

The hepatitis B vaccination series is available to employees through their primary care physician according to their medical insurance program guidelines.

Documentation for hepatitis B Vaccine will be maintained on all health care workers employed by the Mountain Brook School System.

### **Post-Exposure Evaluation and Follow-up**

1. Recognize and exposure/contact has occurred. (If uncertain assume an incident has occurred and continue procedure)
2. Immediately wash hands and any other body surface exposed with soap and water. Flush exposed mucous membranes (mouth or eyes) with copious amounts of water.
3. Notify School administrator or extended day program director of the incident and individuals involved.
4. Notify school nurse of incident.
5. Comply with further guidance from administrator and school nurse with regard to further action as determined by the incident and individuals involved.

Procedure for Administrator/School Nurse:

- For Student to Student Exposures:
1. Contact parent/guardian of each Student.
  2. Meet with parent/guardian of students separately to maintain confidentiality.
  3. Refer to private physician for medical follow-up.
  4. Complete Exposure Incident Report and Evaluation.

- For Employee to Student Exposures:
1. Contact and meet with the parent/guardian of the student
  2. Refer the student to their private physician for medical follow-up.
  3. Meet with the employee/the option for disclosure of personal medical information to the parent/guardian is at the employee's discretion. If the employee agrees to have testing to reassure the parent/guardian, the cost of testing shall be handled according to the medical insurance program guidelines and release of the information is up to the employee.
  4. Complete Exposure Incident Report and Evaluation.

- For Student to Employee Exposure:
1. Refer the employee to their private physician or the Jefferson County Department of Public Health.

2. Request a Healthcare Professional's Written Opinion: Post-Exposure Evaluation and Follow-up.
3. Complete Exposure Incident Report and Evaluation.
4. File Healthcare Professional's Written Opinion: Post Exposure Evaluation and Follow-up Report in the employee's personnel file.

Employee-to Employee Exposures: Follow same procedure for Student to Employee Exposures.

For Exposures of Volunteers or Others in the School Environment who are not employees, students, or contract personnel:

1. Refer individuals to their private physician/The Jefferson County Health Department for medical follow-up.
2. Complete Exposure Incident Report and Evaluation.

For Volunteer/Other to Student Exposures:

1. Contact the Parent/Guardian of the incident involving the student.
2. Proceed as though it is an Employee to Student Exposure (Note: medical expenses are the responsibilities of the individual parties.)
3. Contract personnel medical expenses are the responsibility of the individual, however, the Healthcare Professional's Written Opinion Post-Exposure Evaluation and Follow-up document is required for the personnel file of the contracted individual.

Phone Number for the Jefferson County Department of Public Health: (205)933-9110

The program administrator and the school system nurse should be notified of all exposure incidents.

Documentation of exposure incidents, training, Hepatitis B vaccinations, and Health Professional's Written Opinions will be recorded and stored according to state guidelines. Training records will be kept for a three year period. Hepatitis B vaccination records and waivers, post-exposure incidents, and Health Professional's Written Opinions will be maintained 30 years post-employment.

Confidentiality will be strictly protected for those involved in exposure incidents.

**Employee Training**

Annual training will be provided to all school personnel to improve their knowledge and work practice controls regarding prevention and avoidance of exposure to blood borne pathogens in the workplace. The current Communicable Disease/HIV policy and Exposure Control Plan will be made available to all employees.

**DOCUMENTATION OF ANNUAL TRAINING**

**I acknowledge that I have received training and information regarding the following topics:**

- Location of Exposure Control Plan
- Obtaining a copy of the Exposure Plan
- Epidemiology and transmission of blood borne pathogens
- Recognizing activities with exposure potential
- Methods and practices to prevent or reduce exposure
- Engineering controls, work practice controls, and protective equipment
- Proper medical waste handling and disposal procedures
- Hepatitis B Vaccination
- Appropriate procedure for exposure incidents
- Appropriate reporting procedures
- Opportunities to have my questions answered by the instructor

Name of instructor conducting training:

\_\_\_\_\_

Qualifications of instructor conducting the training: \_\_\_\_\_

\_\_\_\_\_

<b>NAME</b>	<b>JOB TITLE</b>	<b>TRAINING DATE</b>	<b>SIGNATURE</b>
1.			
2.			
3.			
4.			
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14.			
15.			

**PROPER HAND WASHING TECHNIQUE:**

Hand washing is the single most important technique for preventing the spread of infectious diseases.

When to wash your hands:

- Wash your hands when they are dirty.
- Before you prepare food to eat.
- After touching raw meat like chicken or steak.
- Before you eat.
- After you use the restroom
- After you change a diaper or assist someone with personal hygiene.
- Before and after you care for someone who is sick or injured.
- After touching animals, such as dogs and cats.

Technique:

1. Wet hand with running water.
2. Apply soap and lather well. Liquid soap is preferred.
3. Wash hands, using a circular motion and friction for 15-30 seconds. Include the front and back surfaces of the hands, between the finger, and knuckles and around the nails and entire wrist. Wash under jewelry as well.
4. Ring the hands well under running water.
5. Dry the hands well with paper towels, turn off the water faucet with a paper towel and discard the towels.
6. Apply lotion as desired.

**PERSONAL PROTECTIVE EQUIPMENT*****Guidelines for prevention of transmission of HIV and HBV to school system personnel***

<b>Task or Activity</b>	<b>Disposable Gloves</b>	<b>Protective Clothing</b>	<b>Protective Mask</b>	<b>Eyewear</b>
Bleeding control with spurting blood	YES	YES	YES	YES
Bleeding control with minimal blood	YES	NO	NO	NO
Cleaning of athletic mats/area of blood	YES	NO	NO	NO
Cleaning of health room cots/stretchers	YES	NO	NO	NO
Preparing or using chemical dilutions for disinfectant use	YES	NO	NO	YES
Repairing sewage lines and plumbing equipment	YES	YES	YES	YES
Cleaning spills and surfaces containing contaminants	YES	NO	NO	NO
Disposing of garbage and waste materials	YES	NO	NO	NO
Assisting a student with blood glucose monitoring	YES	NO	NO	NO
Diapering	YES	NO	NO	NO
Oral /Nasal Suctioning	YES	NO	NO	YES
Procedures specific to school nursing position	YES	YES*	YES*	YES

\*Procedures specific to school nursing including but not limited to gastrostomy tube feedings and care, tracheotomy care, catheter care, injections, blood glucose monitoring require the use of PPE as determined by the professional nurse in accordance with OSHA guideline and best practice standards in the medical/nursing environment.

## INFORMATION SHEET: SAFE GLOVE USE

Handwashing is essential to prevention and is not replaced by the use of gloves.

Gloves help prevent the transmission of germs from one person to another.

Gloves may be worn to protect the wearer or they may be worn to protect others from the wearer. For example, gloves may be worn to protect the wearer when assisting a person with a bloody nose. However, food preparers wearing gloves protect the public from the wearer.

If you wear contaminated gloves in public areas and touch things such as telephones, doors, drawer handles or elevator buttons, you put everyone at risk for infection.

Gloves **do not provide total protection**, since defects may occur. The combination of gloves, followed by good handwashing upon removal, offers the most complete protection.

To put on single-use disposable gloves:

- Check gloves for tears.
- Put gloves on so that they fit smoothly and are not too big or loose.
- Avoid gloves once they are on to make sure there are no holes.

To remove gloves:

The outside of used gloves should be considered a health hazard. Avoid contacting any bare skin with the outside of used gloves.

- Grasp the cuff area of one glove using other gloved hand.
- Pull the glove off the hand, allowing it to turn inside out.
- Grasp and contain the removed glove within the palm of the gloved hand.
- Place the thumb of the ungloved hand underneath the cuff (between skin and glove) of the gloved hand, and remove it by pulling inside out, over the first glove.
- Both soiled glove surfaces are now contained inside the second glove.
- Discard gloves immediately in a biohazard bag or as recommended.
- After removing gloves, wash and dry hands thoroughly.

Gloves must be changed:

- Between each person touched.
- When gloves are torn or develop a hole.
- Upon completion of each task involving contamination with body fluids.

## **INFORMATION SHEET: LATEX SENSITIVITY**

### **National Institute of Occupational Safety and Health (NIOSH) Alert**

Workers exposed to latex glove and other products containing natural rubber latex may develop allergic reactions such as skin rashes; hives; nasal, eye, or sinus symptoms; asthma; difficulty breathing; and (rarely) shock, DHHS, (NIOSH), Publication No 97-135 at <http://www.cdc.gov/niosh/latex.html>

### **What Is Latex Allergy?**

It is an allergic reaction to products made from natural latex (NRL). It should never be confused with the more common irritant-type reactions that are caused by direct injury to the skin, as from frequent handwashing with detergents. Latex products contain native or endogenous substances such as proteins as well as added processing chemicals. A person can be allergic to the proteins, the focus of this fact sheet, or the chemicals.

### **Who Is At Risk?**

People who are genetically susceptible to latex allergy, just as some people are genetically susceptible to developing hay fever, bee stings and peanut allergies, can become allergic after exposure to latex-containing products. People with a history of multiple allergies, such as hay fever, food allergy, asthma and eczema also can develop latex allergy. Most people who encounter latex products only through their general use in society have no health problems from the use of these products. According to scientific literature, the major risk groups are:

- Children with spina bifida and other congenital (at-birth) abnormalities. It is thought that since these children undergo many medical procedures to correct their medical problems, they are exposed more frequently to products containing NRL. It is not known if other genetic factors related to their conditions predispose them to latex allergy.
- Workers who are genetically predisposed to latex allergy. To protect themselves from exposure to life-threatening blood borne diseases, this group frequently uses and continuously changes NRL gloves as required by OSHA.
- People with conditions that require the frequent use of indwelling catheters or other rubber devices.
- People with a history of allergies such as rhinitis, asthma or food allergies with a positive skin test.

### **In identifying those who are at higher risk to react to latex, consideration should be given to:**

- Health history of allergies
- Hives under gloves
- Hand dermatitis related to gloves with dry cracking skin, sores, bumps or itching
- Allergic conjunctivitis after rubbing eye with recently degloved hand
- Swelling around mouth after dental procedure or blowing up a balloon
- Vaginal burning after a pelvic exam or contact with a condom
- History of occupational asthma where increased latex exposure may be the culprit

If latex allergy is suspected, the individual should contact his/her physician for further medical evaluation.

### **Some Common Products Contain Latex**

<b>Medical Equipment &amp; Supplies</b>	<b>Office Supplies</b>	<b>Household Items</b>
Gloves	Rubber bands	Automobile tires
Blood pressure cuffs	Erasers	Balloons
Stethoscopes		Dishwashing gloves
Intravenous tubing		Expandable fabric (waistbands)
Syringes		Shoe soles
Goggles		Carpeting
Respirators		Motorcycle and bicycle grips

**CONFIDENTIAL**  
**EXPOSURE INCIDENT REPORT AND EVALUATION**

1. Name (employee or student):

2. Social Security Number: \_\_\_\_\_ 3. Date of incident:

4. Notification of parent/guardian (if student): YES \_\_\_ NO \_\_\_ Date: \_\_\_\_\_ Time:

\_\_\_\_\_  
Name and relationship of person notified:

5. Description of individual's duties/activities during the exposure incident:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. The route of exposure was:

a. Needlestick with contaminated needle to (area of body involved) \_\_\_\_\_

\_\_\_\_\_

b. Piercing of skin with contaminated sharp to (area of body involved) \_\_\_\_\_

\_\_\_\_\_

c. Splashing/spraying of blood or other potentially infectious material to (area of body involved)

\_\_\_\_\_

d. Other:

\_\_\_\_\_

\_\_\_\_\_

11. Describe the circumstances under which the incident occurred:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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8. Name of the source individual, if known: \_\_\_\_\_

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9. Can repetition of the incident be reduced or minimized by instituting a new engineering or work practice control? YES \_\_\_ NO \_\_\_

10. If yes, describe the actions that should be taken in the future:

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11. Date this action was instituted and made part of the Exposure Control Plan:

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***Note: Maintain this record for duration of employment or attendance, PLUS 30 YEARS.***

**CONFIDENTIAL**  
**HEALTHCARE PROFESSIONAL'S WRITTEN OPINION**  
**POST-EXPOSURE EVALUATION AND FOLLOW-UP**

Hepatitis B Vaccination is indicated for this employee. YES \_\_\_ NO \_\_\_

If yes, indicate if employee has previously received or is currently receiving vaccination series.

Dates Received

( \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_ )

If vaccine declined by individual, indicate date \_\_\_\_\_.

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Enter date completed:

\_\_\_\_\_ Employee has been informed of the results of the post-exposure evaluation.

\_\_\_\_\_ Employee has been told about medical conditions, if any, resulting from the exposure incident which may require additional evaluation or treatment.

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\_\_\_\_\_  
Employee's Signature

\_\_\_\_\_  
Employee's Name (printed)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Physician

\_\_\_\_\_  
Physician's Name (printed)

\_\_\_\_\_  
Date

## RESOURCES

Websites:

Centers for Disease Control

<http://www.cdc.gov/>

Medline Plus: *The National Library of Medicine, a part of the National Institutes of Health, created and maintains MedlinePlus to assist you in locating authoritative health information*

<http://medlineplus.gov/>

Jefferson Department of Health

<http://www.jcdh.org>