

May 2013

SAFETY BULLETIN

SAFETY SPOTLIGHT:

This month's "Safety Spotlight" highlights the basic requirements under the OSHA Bloodborne Pathogens Standard. It covers classification of employees, training and written program requirements. Please share this information with your school nurses and department supervisors to ensure your program is compliant.



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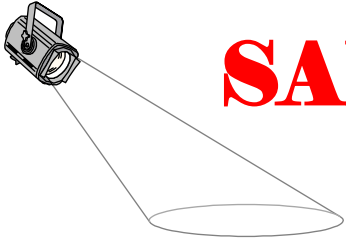
To learn more, please review the attachment.

For further training or to schedule a Customized Training Program at a time and location that is convenient to you, contact:

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SAFETY SPOTLIGHT

Bloodborne Pathogens

Subpart Z of the Code of Federal Regulations (CFR), section 1910.1030 addresses the requirements for occupational exposure to blood and bodily fluids that may contain blood. While there are many different bloodborne pathogens, this regulation focuses primarily on HIV, Hepatitis B and Hepatitis C. In most districts, the school nurse is responsible for the oversight of this program. Most are doing a very good job in managing the regulatory requirements, however on occasion we do see deficiencies in the programs and training.

Under the Bloodborne Pathogens regulations, the employer is required to evaluate each job for possible occupational exposure to blood or other potentially infectious materials (OPIM). This will include bodily fluids that may contain blood. If the employer determines that an employee has a reasonable anticipated exposure to blood while performing their duties, they would be included in the program. OSHA does not specifically categorize job classifications that are included, but leaves the decision to the employer. You would just need to be able to justify exclusion of a particular job class during an inspection.

It is important to note that "Good Samaritan" type acts, such as rendering aid to an injured student or coworker would not be included under the regulation. It only includes anticipated exposures based on the normal duties of the employee. In schools, this will normally include the school nurses, custodial staff, physical education teachers, athletic coaches, athletic trainers and employees designated for emergency response situations where they may need to render first aid. You may need to include special education teachers and para-professionals depending on the exposure risks of the children they are handling (i.e. self-injurious, biters, frequent nosebleeds, etc.).

Once you have determined which employees to include in the program, the employees must receive the appropriate training. Training must be conducted by a technically qualified person, such as your school nurse. Video or computer-based training can be a component of the training, but it cannot be the sole source of the training in accordance with OSHA regulations. In general, the training must include a discussion on what bloodborne pathogens are, methods of transmission, job tasks that may cause exposure, details of the employer Exposure Control Plan, methods to limit exposure, use of proper Personal Protective Equipment, disinfection and cleanup methods, information on the Hepatitis B vaccination and procedures for reporting an exposure incident.



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**NJ has the 5th highest HIV
infection rate in the US
among adolescents between
the ages of 13 and 19.
Never assume someone does
not have a bloodborne
disease, regardless of age.**

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Keeping Your BBP Program Up to Date

- Review the job tasks of every employee category to determine if they would have an anticipated occupational exposure to blood and bodily fluids that may contain blood. If so, they must be included in the BBP Program.
- Provide annual training for all affected personnel. Training must be provided to new employees at the time they are assigned tasks where they would have potential exposure to blood. Refresher training must be provided within one year of the previous training. All training must be conducted by a technically qualified instructor, such as your school nurse.
- Offer the Hepatitis B Vaccinations to all affected employees. These vaccinations must be offered after the initial training and within 10 working days of assignment and at no cost to the employee. If the employee declines the vaccination, they must sign a declination form acknowledging that the vaccine was offered. If they change their mind at a later date and are still an affected employee, the vaccine must be provided free of charge at that time.
- Ensure that the Exposure Control Plan is complete and current. The program must be made readily available to all affected staff. The school nurse will usually be in charge of administering the program. It must have a documented review performed annually. Any changes must be communicated to affected staff.
- Appropriate personal protective equipment, such as gloves and eye protection, must be made available to affected staff. Proper disinfection and clean up materials must be available for staff required to perform housekeeping duties.
- Program procedures must include measures for proper waste disposal, including contaminated sharps. Puncture proof and leak proof containers with the biohazard symbol should be located in the facilities where necessary.
- Don't forget about off-site activities such as traveling sports teams and field trips. The exposure potential still exists and the regulations still apply. Universal precautions dictate that all blood and fluids that may contain blood be treated as though infected. Do not take the risk by assuming someone is not infected.

If you need any assistance or have any questions, please contact the JIF Safety Coordinator, John Geitz at (P) 856.218-8772 or safetyfirst@comcast.net



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