



# SAFETY SPOTLIGHT



ACCASBO, BCIP & GCSSD JOINT INSURANCE FUNDS

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**Topic: OSHA Bloodborne Pathogens Standard**

**March 2018**

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## **Overview**

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Recently, we have encountered several deficiencies in the Bloodborne Pathogens programs in our schools. Typically, oversight of this program is the responsibility of the School Nurse. Common problems we have noted include inadequate or non-existent training, lack of an Exposure Control Plan (ECP), not updating the ECP and not offering the Hepatitis B vaccinations. The information contained in this bulletin should help clarify the critical requirements of this regulation.

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## **Bloodborne Pathogens Regulation**

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The OSHA Bloodborne Pathogens Regulation, 29 CFR 1910.1030, is designed to minimize the risk of an occupational exposure to blood and other potentially infectious materials (OPIM) that could result in transmissions of bloodborne diseases. This includes HIV, Hepatitis B and Hepatitis C among others. The employer is responsible for implementation and oversight of the program for all potentially exposed employees.

The regulation is applicable to any employee that has an anticipated occupational exposure to blood or OPIM during the normal course of their duties. This means that the employee can reasonably be expected to encounter blood while performing their job. It does not include unanticipated emergencies or Good Samaritan Acts. The employer is responsible for identifying what employees are required to be included in this program.

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## **Who Falls Under the Regulation?**

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The employer needs to evaluate each job position in the district and determine if it is likely that person will encounter blood while performing their job duties. If you exclude a position from the regulation, you need to be able to justify why you feel that person or job position does not fall under the standard. This list of job positions will be included in the Exposure Control Plan.

In a school setting, some jobs with exposure are obvious and others need to be more closely scrutinized. Custodians will usually be included since they are likely to clean up incidents involving blood and bodily fluids. Nurses will obviously have a potential blood exposure. Other possible job categories may include physical education teachers, athletic coaches and athletic trainers since they are normally required to have first aid training and an expectation to act as a first responder in an emergency.

You would need to evaluate special education teachers and instructional aides that work with special needs children where the child may be a self-harmer, "spitter" or biter. If there is reasonable potential for blood exposure, training would be needed. Designated emergency response personnel would also be included.

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## **Major Requirements**

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The Bloodborne Pathogens Standard is very comprehensive since it was originally intended to address occupational blood exposures in the medical settings. However, there are some key components of the regulation that are applicable to all situations and you should verify that these are accurately covered.

Key elements of the standard include:

- Written Exposure Control Plan that is updated/reviewed annually;
- Identifying and notifying employees that they are included under the regulation;
- Providing annual training for employees included in the program;
- Supplying all necessary Personal Protective Equipment to minimize exposure risks;
- Supplying all necessary disinfecting chemicals and clean-up materials;
- Providing appropriate disposal supplies and containers for waste products, including approved sharps containers for needles and other contaminated items;
- Providing the Hepatitis B vaccination to all covered employees at no cost;
- Obtaining declination forms from covered employees that decline the Hepatitis B vaccination;
- Offering appropriate medical care following an occupational exposure incident; and
- Maintaining all required records related to the regulation including medical, training, exposure and waste disposal.

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## Implementing Your Program

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Make sure you have a written Exposure Control Plan in place and that it is up to date. If you do not have a program, the JIF Safety Director can provide a generic program for you as a template. Assign oversight of the program to one of your school nurses since they are the most technically qualified to manage the regulatory requirements. Your program should be applied uniformly across the district, so having one nurse in charge or a committee of nurses in charge will ensure everything is consistent.

Identify those employees that have an occupational exposure to blood and include those positions in the program. Notify the affected staff and provide the required training. The ECP will detail the information that must be provided in the training program. The training must be conducted by a technically-qualified person in a “live” setting. Your school nurse is the most likely qualified trainer for this task.

You may use videos and computer-based modules to assist with the required training, but site-specific safety information must be included as part of the live component. This would include who oversees the program, where copies of the ECP are kept, how to report an exposure incident, where to obtain the Hepatitis B vaccinations, location of PPE and decontamination supplies and any other critical safety information related to their job tasks. Training must be provided annually as close to the anniversary date as possible.

The Hepatitis B vaccination is a series of three shots given over a 6-month period and must be offered to all affected employees free of charge. If they decline the shots, they must sign a declination form that documents they were offered the vaccination and chose to decline. They may change their mind at any time and request the vaccination in the future, as long as they are still in a job with blood exposure.

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## Summary

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Remember to file a worker’s compensation report for a blood exposure incident. This will trigger required medical responses to ensure the employee receives proper medical care, testing and counseling. Some bloodborne diseases can take months to show up, requiring multiple blood tests and ongoing medical treatment that can create significant anxiety to the exposed employee. Having a solid plan in place, providing appropriate training and protective equipment will help ensure exposure risks are minimized. Please contact the JIF Safety Director’s Office for questions and assistance.