

Bloodborne Pathogen Exposure Control Plan

- **Policy Statement and Purpose**

Buncombe County/Mountain Mobility is committed to providing a safe and healthful work environment for our staff. In pursuit of this endeavor, the following exposure control plan is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with OSHA standard 29 CFR 1910.1030, "Occupational Exposure to Bloodborne Pathogens" and the "North Carolina Occupational Safety and Health Bloodborne Pathogens Standard."

The Exposure Control Plan (Plan) will assist Mountain Mobility in implementing and ensuring compliance with the standard, thereby protecting employees, and will include:

- I. Program Administration
- II. Employee Exposure Determination and Task and Procedures Involving Risk
- III. Implementation of various methods of exposure control, including
 - a. Universal Precautions
 - b. Engineering and work practice controls
 - c. Personal protective equipment
 - d. Housekeeping
- IV. Hepatitis B vaccination
- V. Post-exposure evaluation and follow-up
- VI. Communication of hazards to employees and training
- VII. Procedures for evaluating circumstances surrounding an exposure incident
- VIII. Recordkeeping

The methods of implementation of these elements of standard are discussed in the following pages of the Plan.

PROGRAM ADMINISTRATION

The *Operations Manager* of Mountain Mobility is responsible for implementation of the Exposure Control Plan (Plan).

Mountain Mobility employees who are determined to have occupational exposure to blood or **Other Potentially Infectious Materials (OPIM)** and all other employees must comply with the procedures and work practices outlined in the Plan.

The *Buncombe County Safety Officer* will ensure that all required medical actions are performed and that appropriate employee health and OSHA records are maintained.

Mountain Mobility's Operations Manager or System Administrator is responsible for notifying the Buncombe County Safety Officer of any new or modified tasks and procedures that affect occupational exposure and new or revised employee positions that affect occupational exposure so that these changes may be incorporated into the Plan and training.

Mountain Mobility's Operations Manager or System Administrator will coordinate with the Buncombe County Safety Officer to establish employee training needs for all classifications, to coordinate employee training and documentation of training, to maintain records of employee Hepatitis B immunization, and to ensure investigation and documentation of circumstances of an employee exposure incident.

The *Safety Manager* of Mountain Mobility will ensure that all necessary personal protective equipment (PPE) and red bags as required by the standard are provided and maintained in each passenger vehicle and at the Mountain Mobility base.

EXPOSURE DETERMINATION

This policy pertains to Mountain Mobility's job classifications as follows:

- All Transit Drivers

The following is a list of job classifications in which some employees may have occupational exposure risk. It is understood that these employees would have very limited exposure to blood and **Other Potentially Infectious Materials (OPIM)**, and most likely only in extreme emergency situations. The amount of risk varies depending upon the circumstances surrounding tasks done by the employee.

Primary

- Transit Trainer/Safety Manager
- Fleet Manager

Secondary

- Dispatchers
- General Manager
- Operations Manager
- Administration

Tasks and Procedures Involving Risk

The following is a list of tasks or procedures that may involve exposure to bloodborne pathogens.

1. Transporting and/or assisting people to and from various locations
2. Performing First Aid/CPR on people in emergency situations
3. Clean-up of blood or OPIM after an emergency situation has occurred

METHOD OF IMPLEMENTATION

Mountain Mobility will conduct semi-annual inspections and review routing conditions to assure that all exposure to Bloodborne Pathogens and OPIM is minimized and protective measures are put in place.

Spill kits and protective equipment, i.e., goggles, latex gloves, and smock, will be put in all vehicles that have been designated as moderate to high exposure to Bloodborne Pathogens and/or Other Potentially Infectious Materials.

The spill kits and equipment will be inspected on a daily basis as part of the driver's daily vehicle inspection report **and twice yearly as part of the van fleet and equipment re-supply.**

Universal Precautions

In order to protect our employees from the hazards of bloodborne pathogens, Buncombe County practices Universal Precautions (UP) in its regular daily activities. The concept of "Universal Precautions" presumes that the blood and certain body fluids of all individuals are considered potentially infected and must be handled accordingly.

Exposure Control Plan

Employees covered by the bloodborne pathogens standard receive an explanation of the Plan during their initial training session. The Plan is reviewed in their annual training update. A copy of the Plan is available for driver review in the Driver's Room. The Plan is also available in the Mountain Mobility Operations Manager's office, as well as the office of the Buncombe County Safety Officer.

Work Practices

Work practices will be used to prevent or minimize exposure to bloodborne pathogens. The specific work practices used are listed below:

- a) Hands must be washed thoroughly between each direct contact and after handling soiled or contaminated equipment or material;
- b) Hands and other skin surfaces must be washed immediately or as soon as feasible if contaminated with blood or OPIM;
- c) When washing is not feasible, an approved antibacterial hand cleanser may be substituted;

- d) Eating, drinking, smoking, applying cosmetics or lip balm, and handling contact lenses are prohibited in the work areas where there is reasonable likelihood of occupational exposure to bloodborne pathogens;
- e) Regulated medical waste is to be placed in red biohazard bags or a biohazard-labeled OSHA approved container;
 - 1. Employees are to notify the Operations Manager (via dispatch if observed while transporting passengers) if they observe that blood or OPIM are stored, handled or discarded inappropriately;
 - 2. The Operations Manager or any other member of Transit Management will notify the Buncombe County Safety Officer if they observe or receive reports that blood or OPIM are stored, handled, or discarded inappropriately.
- f) Employees are not to handle or clean up blood or OPIM in any manner inconsistent with how they have been trained and equipped or as articulated above.

When Transit Management identifies the need for changes in work practices,

- a) Transit Management and the Buncombe County Safety Officer will:
 - 1. Initiate corrective action if unsafe situations are observed.
 - 2. Solicit/encourage employee input about safety and safe practices.
 - 3. Review procedures.

Personal Protective Equipment

Personal Protective Equipment (PPE) is provided to employees at no cost to them. The Transit Trainer/Safety Manager is assigned to orient new employees and provide training in the use of appropriate PPE for tasks or procedures employees will perform.

Examples of types of PPE available to employees are as follows:

- a) Disposable gowns and aprons
- b) Disposable gloves including non-latex gloves and powder free gloves
- c) Disposable face shield, masks, eye shields
- d) Disposable shoe/feet covers
- e) Disposable CPR masks

PPE is located in each vehicle and other areas where blood or OPIM are likely encountered including; the parking lot/driveways/walkways, headquarters building lobby, Training Room, Driver's Room, posted First Aid Kits, Automatic Defibrillator (AED) Station and the PPE resupply itself.

All employees using PPE must observe the following precautions:

- a) Wash hands or use an approved hand cleaner immediately or as soon as feasible after removal of gloves or other PPE;
- b) Remove PPE after completing a task or procedure, after it becomes contaminated, when it is torn or no longer able to provide protection, and before leaving the work area;
 1. Disposable PPE may be placed in the non-regulated trash unless it squeezed produces a drop of blood or if it is damp with infectious materials or caked with dried blood or OPIM that would flake off if handled. Place the latter in a red bag.
 2. Reusable PPE such as resuscitation equipment, **including AED parts** and medical instruments are to be placed in basins **or containers** designated for contaminated equipment **until cleaned and sanitized**.
- c) Wear appropriate gloves when it can be reasonably anticipated that there may be 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;
- d) Never wash or decontaminated disposable gloves for reuse;
- e) Wear appropriate face and eye protection when splashes, sprays, splatters, or droplets of blood or OPIM pose a hazard to the eye, nose, or mouth;
- f) 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.
- g) **Non-sterile training material may be re-used if labeled as such but not contaminated with OPIM as their medical definitions are different.**

Employees are not to take PPE home for cleaning or laundering.

Housekeeping in Building and Vehicles

Daily, without loaded passengers, at the end of a shift (or beforehand if needed) vehicles are swept, little discarded and windows are cleaned by operators. Any surfaces with possible OPIM are sanitized with cleaning implements and products maintained separately in the Training office away from general housekeeping or janitorial items.

During daily van operations, with concern for passenger exposure, OPIM is contained and cleaned by the assigned driver with the van's Blood Pathogen Exposure Kit. Should the amount of OPIM be beyond the scope or area of the kit, then the Fleet Manager or Safety Training will assist in clean-up with separated supplies.

Any OPIM spill beyond the scope or area of the kit will not be cleaned by Mountain Mobility staff, but the vehicle will be parked, passengers discharged, and van tagged with a Bio-Hazard sticker (supplied) on the driver's door and Buncombe County Emergency Management will be called for contract cleanup.

General van exterior washing is conducted twice monthly by outside contractors and van interiors are detailed once month by outside contractors.

Each work area is cleaned according to a schedule by contracted housekeeping staff.

Contaminated spills are contained and cleaned in a manner to prevent splashing or splattering.

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

Employees clean contaminated work surfaces when contaminated, as soon as feasible, or at the end of the workday.

Equipment that cannot be decontaminated is covered to prevent contamination.

Reusable equipment is cleaned to remove debris before decontamination. Employees use appropriate work practices.

Bins, pails, and sinks used to collect or clean contaminated articles are inspected, cleaned and decontaminated as soon as feasible after contamination or at the end of the workday.

Equipment used to clean and decontaminate reusable articles is maintained according to manufacturer's recommendations.

Regulated waste is placed in containers, which are constructed to contain all contents and prevent leakage, and closed prior to removal to prevent spillage or protrusion of contents during handling. Non-intact containers or red bags are placed into another container (as described above) before transport.

- a) The procedure for handling other regulated waste is:
1. Regulated waste cans are lined with disposable, leak-proof red bags.
 2. When these bags are filled level with the top of the container they are lifted from their container, closed, sealed, taken to the regulated waste storage area, and placed in a red bin.
 3. Employees who remove, close and transport bags of regulated waste are careful to avoid touching or handling the sides or bottom of bags.

4. Waste containers are regularly inspected and are decontaminated upon visible decontamination by staff and cleaned by housekeeping staff according to schedule.
5. Employees wear appropriate PPE. Gloves are always worn.

HEPATITIS B VACCINATION

Hepatitis B vaccination is offered to employees according to the guidelines and recommendations of the U.S. Public Health Service.

The Buncombe County Safety Officer, **or designee**, will provide training to employees on Hepatitis B vaccinations addressing the safety, benefits, efficiency of administration, and availability.

Hepatitis B vaccination shall be made available after the employee has received the training in occupational exposure and within 10 working days of initial assignment to all employees who have occupational exposure unless the employee has previously received the complete Hepatitis B vaccination series, antibody testing has revealed that the employee is immune, or the vaccine is contraindicated for medical reasons.

Participating in a pre-screening program shall not be a prerequisite for receiving the Hepatitis B vaccination.

If the employee initially declines the Hepatitis B vaccination, but at a later date, while still covered under the standard, decides to accept the vaccination, the vaccination shall then be made available.

All employees who decline the Hepatitis vaccination shall sign a required waiver/declination indicating their refusal. The Operations Manager and Buncombe County Safety Officer shall maintain documentation of the employee's declination of the vaccination.

If the U.S. Public Health Service recommends a routine booster dose of Hepatitis B vaccine at a future date, such a booster shall be made available.

The Buncombe County Safety Officer will maintain a record of the employee's Hepatitis B immune status and/or vaccination status. These records are confidential and maintained separately from all employees' **personnel or training files**.

POST-EXPOSURE AND FOLLOW-UP

All exposure incidents shall be reported, investigated and documented. When an employee incurs an exposure incident, it shall be reported to the dispatch, who will forward the information on to the Operations Manager.

Exposure to blood or OPIM can occur during routine work tasks and during accidents and injuries that are not task related such as when an employee renders first aid or emergency care to a client or fellow employee.

Should an incident involving blood or OPIM occur, employees are to contact the Operations Manager (via dispatch or phone if transporting passenger) who will contact the Buncombe County Safety Officer immediately.

Any employee that responds to a first aid or incident under the following circumstances must report this incident. The Buncombe County Safety Officer will access and determine if an actual exposure occurred.

- a) Incident involves the presence of blood or bodily fluids;
- b) Incident occurs at the Mountain Mobility office during employee's workday;
- c) Incident occurs while the employee is representing Mountain Mobility in an official capacity

When the Buncombe County Safety Officer confirms an exposure, the employee is to follow the instructions of the Buncombe County Safety Officer regarding post-exposure medical evaluation.

For every exposure incident the following procedure applies:

- a) Employees will obtain on-the-job first aid.
- b) Employee will notify the Planner/Manager who will notify the Buncombe County Safety Officer.
- c) The Safety Officer will:
 - 1. Respond to employee report of exposure incident and counsel the employee in follow-up procedures.
 - 2. Complete the Buncombe County Exposure Report form including documentation of the routes of exposure and how the exposure occurred and other reports as required.
 - 3. Identify and document the source individual if identification is feasible.
 - 4. Follow-up with source individual by obtaining consent and making arrangements to have the source individual tested as soon as possible to determine HIV, HCV, and HBV infectivity, if infectivity is not already known, and ensure that the source individual's test results are conveyed to the health care professional providing evaluation of the exposure.
 - 5. 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 (NC Statute regarding confidentiality).

6. Ensure that if the employee does not give consent for HIV serological testing at the time blood is collected for baseline testing, the blood sample will be preserved by the laboratory for at least 90 days. If the exposed employee elects to have the baseline sample tested during this waiting period, the test will be performed as soon as feasible.
7. Ensure that the laboratory is given a copy of OSHA's bloodborne pathogen standard.
8. Obtain a copy of the health care professional's Written Opinion and provide a copy to the employee within 15 days of the completion of the post-exposure evaluation. The written opinion shall be limited to whether the employee requires the Hepatitis B vaccine and whether the vaccine was administered and, whether the employee was informed of the results of the medical evaluation and has been told about any medical conditions resulting from the exposure that require treatment or follow-up evaluation.
9. Ensure that the health care professional evaluating an employee after an exposure incident receives a copy of Buncombe County Transportation Division/Mountain Mobility Exposure Report that contains 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
 - Relevant employee medical records, including vaccination status

COMMUNICATION OF HAZARDS TO EMPLOYEES AND TRAINING

The Transit Trainer/Safety Manager shall ensure that training is provided to the employees at the time of initial assignment to tasks where occupational exposure may occur, and that it shall be repeated within twelve months of the previous training. Training shall be provided at no cost to the employee and at a reasonable time and place. Training shall be tailored to the education and language level of the employee. The training will be interactive and cover the following elements:

- a) An accessible copy of the standard and an explanation of its contents;
- b) A discussion of the epidemiology and symptoms of bloodborne diseases;
- c) An explanation of the modes of transmission of bloodborne pathogens;
- d) Explanation of Mountain Mobility's Transportation Bloodborne Pathogen Exposure Control Plan, and a method for obtaining a copy;
- e) The recognition of tasks that may involve exposure;
- f) An explanation of the use and limitations of methods to reduce exposure, for example, work practices, and personal protective equipment;
- g) Information on the Hepatitis B vaccination, including efficacy, safety, method of administration, benefits, and that it will be offered free of charge;
- h) Information on the types, use, location, removal, handling, decontamination, and disposal of Personal Protective Equipment;
- i) Information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM;
- j) An explanation of the procedures to follow if an exposure incident occurs, including the method of reporting and medical follow-up;
- k) Information on the evaluation and follow-up required after an employee exposure incident.

The person conducting the training shall be knowledgeable in the subject matter. Employees who have received training on bloodborne pathogens in the twelve months preceding the effective date of this policy shall only receive training in provisions of the policy that were not covered.

Additional training shall be provided to employees when there are any changes to tasks or procedures affecting the employee's occupational exposure.

PROCEDURE FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

The *Buncombe County Safety officer along with the Operations Manager* will review the circumstances of all exposure incidents to determine:

- a) Work practices followed
- b) Protective equipment or clothing that was used at the time of the exposure incident
- c) Location of the incident
- d) Procedure being performed when the incident occurred
- e) Employee's training

They will then determine if changes and revisions need to be made in work place controls or procedures and complete the Mountain Mobility Review of Circumstances Surrounding Employee Exposure to blood or OPIM.

The *Buncombe County Safety Officer*:

- a) Ensures that the circumstances of the exposure are investigated;
- b) Ensures that appropriate changes are made in work practice if it is determined that changes need to be made;
- c) Maintains documentation of the review of circumstances and recommendations and ensures that the exposed employee is not identified in the documentation;
- d) Ensures that appropriate changes are made to the Plan if it is determined that revisions need to be made.