

**Kittery School District  
Occupational Exposure Control Plan**

The Kittery School District is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this goal, the following exposure control plan (ECP) 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."

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

- Determination of employee exposure
- Implementation of various methods of exposure control, including:
  - Universal precautions
  - Engineering and work practice controls
  - Personal protective equipment
  - Housekeeping
- Hepatitis B vaccination
- Post exposure evaluation and follow up
- Communication of hazards to employees and training
- Recordkeeping
- Procedures for evaluating circumstances surrounding exposure incidents

Implementation methods for these elements of the standard are discussed in the subsequent pages of this ECP.

**PROGRAM ADMINISTRATION**

- School Nurses are responsible for implementation of the ECP during school hours.
- The Athletic director will be responsible for the plan during athletic events and the Maintenance director will be responsible for the environment.
- The Human Resources Manager and the School Nurses will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures.  
Contact: Lauren Lawson, Human Resources- 207-475-1338
- Those employees who are determined to have occupational exposure to blood or other potentially infectious materials (OPIM) must comply with the procedures and work practices outlined in this ECP.
- School Nurses will provide and maintain all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), and teal bags as required by the standard. School

Nurses will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.

Contact(s):

Horace Mitchell Primary School:                      Shay Stathoplos 439-5855

Shapleigh School:    Brenda Bladen 439-5866

R.W Traip Academy:    Betsy Burke 439-4402

- Human Resources Manager will be responsible for ensuring that all medical actions required by the standard are performed and that appropriate employee health and OSHA records are maintained. Contact: Lauren Lawson, Human Resources- 207-475-1338
- Human Resources Manager will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives. Contact: Lauren Lawson, Human Resources- 207-475-1338

### EXPOSURE DETERMINATION

A. All of the following employees may reasonably anticipate exposure to blood and other potentially infectious body fluids in the course of their work activities:

<u>Job Classification</u>	<u>Task/Procedures</u>
School Nurse	First Aid
School Nurse & Education Technician	Toilet an encopretic child
School Nurse	Assist students in glucose testing
School Nurse	Administer insulin

B. Employees who may have occasion for exposure to blood and other potentially infectious body fluids in the course of work activities:

<u>Job Classification</u>	<u>Task/Procedures</u>
School Secretaries	Assist students with first aid in absence of nurse
Physical Education Teachers	First Aid
Coaches	First Aid
Custodians	Clean up of blood and bodily fluids;
ALL teachers K-3	Bloody nose and injuries
Cafeteria Workers	Food preparation
Lunch and Recess Monitors	Bloody noses and injuries

## IMPLEMENTATION

### A. Universal Precautions

All employees will utilize universal precautions to prevent contact with blood or OPIM. All blood or OPIM will be considered infectious regardless of the perceived status of the source individual. Employees will cover any wound that is not scabbed over and could be a source of potential exposure.

- Diabetic students, as developmentally appropriate and in other than emergency situations, will perform their own glucose testing after having demonstrated proficiency.
- Students will be taught to apply pressure to stop bleeding or nosebleeds.

### B. Engineering Controls and Work Practices

Engineering and work practice controls and personal protective equipment will be used to prevent or minimize exposure to bloodborne pathogens. The specific engineering and work practice controls will be:

- All employees will wear protective gloves when dealing with blood or OPIM (other potentially infectious materials)
- All spills of blood or OPIM will be cleaned up using appropriate approved antiviral/antibacterial agent
- All employees will wash hands after contact with blood or OPIM even if wearing gloves. After removal of personal protection, employees will wash their hands and other potentially contaminated skin immediately with soap and water
- If employees incur exposure to their skin or mucous membranes those areas will be washed or flushed with water, as appropriate, immediately or as soon as feasible, following contact
- Adequate and accessible hand washing facilities are available in all schools for employees who incur exposure to blood or OPIM
- Any individual who has blood stained clothing will change into clean clothes, if the clothing cannot be properly cleaned. The bloody clothing will be bagged and sent home with the individual
- Contaminated broken glass and other materials will not be picked up with hands. It will be swept up or picked up by mechanical means (sweeping with broom and dustpan or vacuum)
- The nurses will maintain properly labeled sharps containers. Contaminated needles and other contaminated sharps are discarded in the sharps container in the school nurses' offices immediately or as soon as possible. Contaminated sharps will not be bent, recapped, removed, sheared or purposely broken. Sharps containers are puncture resistant, leak proof, labeled as a biohazard and kept out of the reach of children in the schools. They will be checked twice a year and be disposed of as needed. The custodial staff can dispose of the sharps container at the town transfer station once the sharps container is properly closed

- The nurses will provide employees with personal kits for emergency protection, if necessary, which will contain disposable gloves, gauze squares, Band-Aids and nose plugs or nose clips. Employees will notify nurses if their personal kits need supplies
- Waste baskets will be emptied each school day by custodians
- Waste baskets in the nurse's offices will have double bags
- Buildings will be cleaned and decontaminated on a routine basis,
- MSDS sheets and cleaning schedules will be kept by the custodial supervisor
- All contaminated work surfaces will be decontaminated after completion of procedures or as soon as feasible after any spill of blood or OPIM

### C. Personal Protective Equipment (PPE)

Employees will be provided appropriate personal protective equipment free of charge. It will be chosen based on the anticipated exposure and will prevent blood or OPIM from reaching the skin or mucous membranes.

- Disposable non-latex gloves will be available through the nurses' offices, custodial services, and nutritional services
- Disposable non-latex gloves will be worn when it is reasonably anticipated that employees will have hand contact with blood or OPIM
- Disposable non-latex gloves which have been contaminated will be removed, disposed of in a lined trash can, and then the employee should immediately wash hands
- Used or contaminated disposable gloves are not to be washed or decontaminated for reuse and are to be replaced when they become contaminated, torn, punctured or when their ability to function as a barrier is compromised
- Utility gloves can be washed and reused if they are intact (no cracking or punctures)

### **HEPATITIS B VACCINE**

- All employees identified as having potential occupational exposure will be offered the vaccine series free of charge through the Kittery School District's occupational health provider. Employees who are exposed should contact Human Resources.
- Employees who decline the vaccine will sign a declination waiver statement. Employees who initially decline the vaccine can change their mind at any time and have the vaccine provided at no cost.
- Employees who are unsure of their vaccination history may contact their primary care provider to request a titer, and to receive a recommendation about further HBV vaccinations

## POST EXPOSURE EVALUATION AND FOLLOW-UP

An exposure incident means direct transmission of blood or other potentially infectious material to mucous membranes or non-intact skin of the employee, including a needle stick puncture by contaminated sharps. In the event of an exposure, the procedure is as follows:

- Immediate first aid. The employee will wash the exposure site thoroughly with soap or disinfectant and water. Flush affected eyes and/or mucous membranes with water immediately
- Employee will immediately report the injury to the Human Resources Department.
- All employees who incur an exposure incident will be offered a post-exposure evaluation and follow up. The school nurse and/or supervisor will arrange for this medical post-exposure evaluation and follow up by the Kittery School District occupational health provider
- The employee will complete a First Report of Injury form, which will include the circumstances under which the incident occurred and documentation of the route of exposure (skin, mucous membrane, etc.) **This will be submitted within 24 hours.**
- The occupational health provider will meet with the employee. Information about blood borne pathogens and instructions for follow up will be given to the employee. Blood collection and testing will be discussed
- If the source individual is known, the school nurse will provide an appropriate form for the source individual to complete and return directly to the occupational health provider (This is called the "Employee's Notice of Accidental Injury or Illness")
- The source individual's blood shall be tested as soon as feasible and after consent is obtained in order to determine HBV and HIV infectivity. If consent is not obtained, the employer shall establish that legally required consent cannot be obtained. When the source individual's consent is not required by law, the source individual's blood, if available, shall be tested and the results documented. Results of the source individual's testing shall be made available to the exposed employee, and the employee shall be informed of applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual
- The original copy of the First Report of Injury will be sent to the Human Resources Department and retained in the employee's medical file

Procedures for evaluating the circumstances surrounding an exposure incident:

The Human Resources Manager will review the circumstances of all exposure incidents to determine if the Exposure Control Plan (ECP) has been followed. If it is determined that revisions need to be made, the Human Resources Manager will ensure that appropriate changes are made to this ECP. Areas to be reviewed include:

- Engineering controls in use at the time
- Work practices followed
- A description of any device being used at the time of exposure

- Protective equipment or clothing that was used at the time of the exposure incident (gloves, etc.)
- Location of incident
- Procedure being performed when the incident occurred
- Employee's training

#### **EMPLOYEE TRAINING**

- Training for all new employees will be conducted prior to initial assignment to tasks where occupational exposure may occur. Training will be conducted in the fall of each school year and will include an explanation of:
  - The OSHA Standard for Bloodborne Pathogens
  - Modes of transmission of Bloodborne Pathogens
  - An explanation of this ECP, points of the plan, and how the plan will be implemented
  - Tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
  - Use and limitations of engineering controls, work practice and PPE
  - Types, uses, location, removal, handling, decontamination and disposal of PPE
  - Appropriate actions to take and persons to contact in an emergency involving blood or OPIM
  - Procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available

#### **RECORDKEEPING**

- The Human Resources Manager will keep all records required by the standard. Kittery's occupational health provider will keep medical records related to exposure incidents
- The Human Resources Manager will coordinate training of staff

THIS EXPOSURE CONTROL PLAN WILL BE EVALUATED AND UPDATED AS NEEDED ANNUALLY

Reviewed by Human Resources and Director of Nursing 09/01/2015

Reviewed by Human Resources and Director of Nursing 10/02/2017

Reviewed by Human Resources and Director of Nursing 08/16/2018

Reviewed by Human Resources and Director of Nursing 08/18/2019