Bloodborne Pathogens Exposure Control Program Plan

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References: California Code of Regulations, Title 8, Section 3204; Access to Employee Exposure and Medical Records, Section 5193, District Illness and Injury Prevention Program Manual

This procedure minimizes risk exposure or, if necessary, advises as to how to effectively treat employees involved in an accident where there is a possibility of exposure to bloodborne pathogens.

Procedure:
District management recognizes the potential danger to staff which may result from occupational exposure to bloodborne pathogens as addressed by CAL/OSHA’s Occupational Exposure to Bloodborne Pathogens. District management also recognizes the need for protecting employees from this risk. Recognizing that it is in the best interests of management, employees and injured workers, District management supports and desires to comply fully with the letter, spirit and intent of these rules. To this end, the Bloodborne Pathogens Exposure Control Plan addresses the methods of compliance with 8 CCR 5193 through the use of District policies and standards of practice. These specific policies and procedures are intended to strengthen the widely used Universal Precautions (see below). These policies and procedures are consistent with our existing Injury and Illness Prevention Program Manual but, as was the intention of CAL/OSHA in publishing this regulation focused attention on reducing the risk of contracting bloodborne pathogens while working in the employ of the District. Particular attention is given to the identification of the degrees or classifications of risk associated with different jobs, based upon tasks which individuals in those jobs may be called upon to perform. This is essential for developing, implementing and monitoring training specifically directed at reducing the risk of infection among District staff.

Other areas of special concern address:
• Procedures for evaluating the circumstances surrounding exposure incidents in order to improve the means of reducing or eliminating associated risks;
• Medical procedures for prevention and for post-exposure evaluation and follow-up at no cost to District employees.

Responsibilities for implementation of the plan are as follows:

All District employees shall be responsible for the following:

• Identifying situations or conditions which have an impact on this plan and which should be addressed by modifications or additions. Changes shall be made and communicated as soon as the need is recognized;
• Insuring compliance with the letter, spirit and intent of the District’s policies for the prevention of transmission of bloodborne pathogen;
• Knowing how to recognize occupational exposure and communicating changes in exposure classification to their supervisors when performing tasks or procedures which involve an increased risk of exposure;
• Following all specific procedures and processes specified in the plan;
• Advising supervisors or managers directly of any locations where contamination as defined in the plan could reasonably be expected to occur;
• Wearing and maintaining personal protective equipment appropriately;
• Identifying and removing from use, pieces of personal protective equipment that have been damaged;
• Adhering to Universal Precautions as defined in the plan to guard against infection by bloodborne pathogens when working with or around equipment, tools, machinery or surfaces at a work or accident site during and following emergency treatments of victims;
• Knowing her/his exposure training certification expiration date and for initiating action if not scheduled for training within an appropriate time. No employee whose exposure training certification has expired is allowed to or will perform potentially hazardous procedures except in an emergency situation, and then only after informing her/his supervisor of the expired training status and volunteering to perform the procedure.

Educational administrators, managers and supervisors shall be responsible for the following:

• Beginning immediate action to achieve compliance with the policies, procedure and performance standards of the plan;
• Classifying tasks performed in their areas of responsibility according to the exposure classifications in the plan;
• Developing and maintaining up-to-date, state-of-the-art procedures for eliminating or reducing associated risks;
• Monitoring employees’ job performance to minimize risk of exposure incidents;
• Updating job descriptions if new tasks which present a change in occupational exposure status are assigned to be performed by individuals in a job classification;
• Monitoring employees’ training status and compliance with risk-reducing Universal Precautions (see plan) and specific risk-reducing policies;
• Insuring that all personnel assigned to their work unit have met the training requirements for assignments in which there is a risk of occupational exposure to bloodborne pathogens;
• Maintaining currency of knowledge of available types of personal protective equipment to minimize risk of accident and injury;
• Being particularly attentive to recognizing and acting to prevent unsafe actions by anyone in their work unit;
• Providing a sufficient quantity of appropriate personal protective equipment in appropriate sizes to insure that employees administering first aid have it available when and where needed;
• Inspecting protective equipment for cleanliness, safety and damage while processing it to return to inventory;
• Monitoring first aid supplies and adjusting normal delivery volume as rates of consumption change, and insuring that no employee will at any time have to choose between providing immediate attention to a victim without the benefit of protective equipment or waiting for appropriate equipment to be found;
• Insuring that appropriate medical supplies are available within a reasonable time at an accident scene whenever bloodborne pathogens is reasonably suspected.

The Chief Human Resources Officer shall be responsible for monitoring full compliance with the plan as the designee of the Superintendent/President, and is responsible for the following:
• Scheduling and implementing initial training for any position that may reasonably expose a person to blood or OPIM;
• Scheduling and implementing Bloodborne Pathogens training for all employees within the annual training cycle;
• Providing training in accordance with the CAL/OSHA. Courses shall be taught by qualified instructors who are subject matter experts and are intimately familiar with the policies, procedures and plan of the District;
• Insuring that special training sessions are offered quarterly for employees whose primary language is not English or whose command of English is insufficient to allow for proper understanding of course content.

The Health Services Coordinator/Nurse Practitioner shall be responsible for providing advice and technical information to assist in the original risk classification of a position or job classification, particularly for risk Classifications I and II, and for other advice and information on technical aspects of the program and Plan.

The College physician shall be responsible for the following:
• Providing technical information and medical opinions to District management in conjunction with the process of annual and/or other monitoring of duty restrictions on employees who are under post-exposure duty restrictions in accordance with the Plan;
• Providing information and advice to District employees on current U.S. Public Health Service recommendations regarding HBV vaccination.

Personal or occupational health care physicians shall be responsible for the following:
• Providing medical treatment to employees who have experienced occupational exposure to bloodborne pathogens;
• Knowing the location and inventory level of appropriate and properly sized protective equipment;
• Advising supervisors if adequate first aid supplies are not available for the duration of the work shift;
• Inspecting personal protective equipment before use and placing defective pieces in the reject container located in each storage area.