

Commonwealth Scaffold, LLC
Bloodborne Pathogens
Program and Training
Materials

Effective Date: 12/14/2012
Revision #:



Table of Contents

Bloodborne Pathogens Program1

Employee Handout6

Presentation Instructor Notes7

Presentation Quiz9

Presentation Sign-In Log10

Prepared by:

Date:

Approved by:

Date:

This policy is merely a guideline. It is not meant to be exhaustive nor be construed as legal advice. It does not address all potential compliance issues with federal, state, local OSHA or any other regulatory agency standards. Consult your licensed Commercial Property and Casualty representative at Allied Insurance Brokers, Inc. or legal counsel to address possible compliance requirements.
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Bloodborne Pathogens Program

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Reference Standard

Occupational Safety and Health Administration (OSHA); Bloodborne Pathogens, Subpart Z, 29 CFR 1910.1030

Purpose

This program is designed to eliminate or minimize employee exposure to bloodborne pathogens.

Scope

This program applies to all of our company employees, all contractors and vendors performing work on company property as well as all other individuals who are visiting or have business with our company.

Note: This training guide does not apply to HIV and HBV research laboratories and HIV and HBV production facilities.

Responsibilities

- Management is responsible for development and review of this program. Management is also responsible for appropriate employee training.
- Management and supervisors are responsible for enforcement of this program.
- Employees shall comply with all procedures outlined in this policy.
- Contractors and vendors shall comply with all procedures outlined in this policy.

Definitions

Bloodborne Pathogens: (BBP) Pathogenic microorganisms that are present in human blood and can cause disease to humans. Examples are: HIV, Hepatitis B and AIDS.

Contaminated: The presence or the reasonably anticipated presence of blood or other potentially infectious materials on an item or surface.

Contractor: A non-company employee being paid to perform work in our facility.

Exposure incident: Any specific eye, mouth, other mucus membrane, non-intact skin, or other contact with blood or potentially infected material.

Other Potentially Infected Material: (OPIM) Any bodily fluid that is visibly contaminated with blood or any fluids in which it is difficult or impossible to tell what the fluid is and/or if it is contaminated with blood.

Personal Protective Equipment: (PPE) Gloves, safety glasses, suits, face shields, etc. worn to prevent contact with blood or other bodily fluids.

Regulated Waste: Liquid or semi-liquid blood or OPIM in a liquid or semi-liquid state if compressed; items that are caked with dried blood or OPIM and are capable of releasing these materials during handling; contaminated sharps; wastes containing pathogens or microbiological waste.

Sharps: Medical devices with a point and/or a blade capable of penetrating human skin (e.g. hypodermic needles, scalpels, etc.).

Universal Precautions: Our approach to infection control. All bodily fluid will be treated as if it was contaminated with a bloodborne pathogen and appropriate protection and sanitation steps will be taken.

Vendor: A non-company employee being paid to perform a service in our facility.

Procedure

Exposure Control Plan

There are only two possibilities for bloodborne pathogens exposure in our facility:

- While responding to an illness or injury to provide first aid care; or
- When cleaning and sanitizing a bodily fluid spill.

Additionally, an employee could experience unintended exposure from contact with blood or OPIM.

Accordingly, there are no direct engineering controls available. Our exposure control plan is:

1. Only designated personnel who are trained, authorized and equipped to respond to medical emergencies and or bodily fluid spills will do so. All other personnel will avoid contact and notify their supervisor if a spill or exposure incident is encountered.
2. While responding to bodily fluid spills, an appropriate level of PPE will be worn including:
 - Safety glasses-Incidents with minimal exposure potential (e.g. a laceration with minimal bleeding);
 - Face Shield-Incidents with a potential of bodily fluid becoming airborne (e.g. a laceration with spurting, arterial bleeding);
 - Disposable liquid proof gloves- All incidents;
 - Apron/disposable suit and shoe covers- Incidents with a potential of bodily fluid becoming airborne or incidents in which response personnel could walk through a spill or move against material contaminated with a spill; or
 - Barrier mask and/or Bag Valve Mask-Incidents requiring mouth to mouth or mouth to nose breathing.

Adequate supplies of personal protective equipment are kept in the following locations:

(List locations of BBP PPE) _____.

3. Regulated Waste such as: contaminated dressings, bandages and other materials will be double bagged in red biohazard bags and disposed of as regulated waste using an approved disposal contractor. We do not use any medical sharps.
4. All potentially contaminated surfaces will be cleaned and sanitized with an approved sanitizing solution or will be disposed of as contaminated medical waste. Personnel performing this duty will be trained in all aspects of this plan and will be required to wear appropriate PPE as outlined above.
5. After performing necessary duties personnel will clean and sanitize any contaminated PPE, remove and discard it.
6. All personnel are required to wash their hands with soap and warm water (waterless skin sanitizer is available to use when potable water is remote from the scene) immediately after removing PPE.
7. Any employee (including both personnel trained and authorized to respond to incidents and those that are not) should immediately do the following if an exposure is suspected:
 - Wash exposed skin surfaces with large amounts of soap and warm water. Exposed mucus membranes should be rinsed with large quantities of warm water
 - Report any actual or suspected exposure incident to their supervisor or the plan administrator. The employee will immediately be referred to a physician or other licensed health care provider for confidential follow-up care to be provided at no cost to the employee.

Plan Review

This plan will be review annually and revised as needed by the program administrator.

Training

All employees who are authorized to respond to potential exposure incidents will be trained annually regarding this exposure control plan and their duties.

Employees who have no occupational contact with potentially contaminated materials will receive awareness training upon hire.

Hepatitis B Vaccination

All personnel who are assigned job duties where they are required to respond to potential exposure incidents will be offered the Hepatitis B vaccination series at no cost. The initial offer of the Hepatitis B vaccination will be within 10 days of assignment. If the employee initially declines the vaccination s/he can rescind the declination at any time. Any employee who declines the Hepatitis B vaccination is required to sign the declination form. (See Appendix A for copies of the Acceptance and Declination statements)

Recordkeeping

The employer must maintain accurate records for each employee with exposure to bloodborne pathogens. This record shall include:

- The name and social security number of the employee;
- A copy of the employee's hepatitis B vaccination status including the dates of all the hepatitis B vaccinations and any medical records relative to the employee's ability to receive vaccination;
- A copy of all results of examinations, medical testing, and follow-up procedures;
- The employer's copy of the healthcare professional's written opinion; and
- A copy of the information provided to the healthcare professional.

The employer must ensure that employee medical records are kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the workplace except as required by this section or as may be required by law.

Revision History Record:

Revision Number	Section	Revised By	Description
0	NA	NA	Original document.

Appendix A

Hepatitis B Vaccination Acceptance and Declination Form

Hepatitis B Vaccination Acceptance and Declination Form

ACCEPTANCE STATEMENT

I understand that due to my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring Hepatitis B virus (HBV) infection. I hereby accept the opportunity to be vaccinated with the Hepatitis B vaccine, at no charge to myself.

Employee Signature

Date

DECLINATION STATEMENT

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring Hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to myself. However, I decline Hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If, in the future, I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Employee Signature

Date

PLAYING IT SAFE

Be safe and healthy on the job at Commonwealth Scaffold, LLC with these helpful tips provided by Allied Insurance Brokers, Inc..



Bodily Fluid Cleanup Safety

Helpful tips for reducing your risk of serious disease

Sometimes the workplace brings surprises, when we least expect it. That includes coming in contact with blood or other bodily fluids, but you may find yourself in circumstances in which you will be forced to deal directly with them (vomiting, bleeding, etc.). In case that happens, Commonwealth Scaffold, LLC wants you to be prepared to protect yourself from bloodborne pathogens and other infectious materials that can be hazardous to your health.

Know How to Stay Protected

Blood and body fluids can contain microbes that cause illness and disease when you come into contact with them. This may happen when you are handling and disposing of contaminated trash or waste, or when you are cleaning up after an accident or unusual situation involving bodily fluids. To minimize your exposure, consider the following recommendations:

- Wear the appropriate personal protective equipment (PPE). This may include gloves, protective eye goggles or a mask. Always check to make sure the PPE is not damaged before use and remove it carefully to avoid self-contamination. Dispose of contaminated protection properly in a leak-proof container that is marked for disposal or decontamination.
- If you have not been trained on the proper use of PPE, do not clean up a mess involving blood or bodily fluids. Notify your supervisor and he or she can find someone who is adequately trained in safe cleanup methods.
- Wash yourself thoroughly after removing PPE. Cover any open wounds or cuts to protect against unnecessary exposure.

- Use good work practices and common sense while cleaning up blood and bodily fluids. Try to avoid splashing these materials as you soak them up.
- Clean and disinfect all equipment and surfaces in contact with blood or other infectious material safely.
- Know the proper response for accidental personal exposure so you won't panic when you need to act fast.

What to Do if You're Exposed

If you are exposed to blood or other bodily fluids, immediately do the following:

- Wash the affected area thoroughly.
- Report the incident to your supervisor, complete an incident report form and promptly receive follow-up medical care by your doctor or other medical professional.

If your eyes, mouth or broken skin come in contact with blood or any other infectious material, flush the area with water and request immediate medical treatment. You may also have to do the following:

- Document what occurred
- Identify and test the source of the fluids, if possible
- Test your blood for possible disease exposure
- Receive counseling treatment after the incident



Serious Risks

Three of the most serious infectious diseases that are transmitted through human blood products and bodily fluids are the Hepatitis B virus, the hepatitis C virus and HIV. Since these diseases are difficult to identify and treat, you need to take special precautions to minimize your risk of exposure.

This flyer is for informational purposes only and is not intended as medical or legal advice.

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BLOOD BORNE PATHOGENS INSTRUCTOR NOTES

The following provides a useful preparation outline for use by trainers presenting the Bloodborne Pathogen program presentation to employees. The presentation is available from Allied Insurance Brokers, Inc..

Training Objectives

- Review the Bloodborne Pathogen program and train employees in proper facility procedures
- Train employees to recognize situations where contact with blood or OPIM is possible

Before Training

- Read the OSHA standard and the model Bloodborne Pathogen Program
- Understand that this program is not written for health care facilities or for facilities with medical departments staffed by professional care givers; in either case, a facility specific exposure control plan is probably required.
- Understand that an employer can decide that its facility policy is to require employees to avoid all contact with blood and OPIM. If this is the case document that no contact is foreseeable, but there must be an arrangement for trained contractors to be used if a blood/bodily fluid spill occurs.
- Bring examples of the facility PPE used to protect against exposure during potential exposure incidents. Designated employees should be shown how to use this equipment and given an opportunity to try it on during a training environment.

Introduction for Training

- Begin by stressing the overall importance of safety in your facility
- Review the importance of following all exposure prevention rules because it is impossible to tell by looking at an individual if s/he is infected with a bloodborne pathogen
- The following information from NIOSH puts the risk in some perspective. For accidental needle sticks that occur in health care (needle sticks are the best mechanism of transmitting bloodborne pathogens from one person to another):
 - 6% to 30% for Hepatitis B
 - 1.8% for Hepatitis C
 - 0.3% for HIV
- Statistics are not available for infection resulting from contact of infected material with broken skin or mucus membranes-presumably the incidence is significantly lower.
- Stress the importance of washing hands and other potentially exposed skin following all response incidents
- Give examples of what situations could occur necessitating use of the procedure
- As a ground breaker, you can ask employees what experience they have had with first aid or other response activities involving bloodborne pathogens

General Guidelines

- Stress the importance of the bullet points on these slides
- Stress the importance of the individual employee being committed to his/her own safety
- Be sure to be open to questions or comments

Training Notes

- Review the location(s) of PPE and clean-up and sanitation equipment use for bloodborne pathogen response
- Review and demonstrate cleaning and sanitation procedure with students
- Review any chemical handling safety issues associated with the sanitizing solution(s) used in your facility
- Discuss the points listed on the slide

Conclusion

Review the importance of safety in your facility

Offer all students, with job assignments for first aid response or incident clean-up and sanitation, the Hepatitis B vaccination. Document their acceptance or declination with the statements contained in the model program.

Review the important points listed on the "Conclusion" slide

Student Exercise

At the conclusion of the training have students demonstrate the following:

1. How to wear the appropriate PPE for a mock incident that you describe
2. How to safely remove PPE post-incident
3. What steps to take if the student believes that s/he has suffered an exposure
4. How to clean and sanitize a spill

Quiz Answers

1.) A 2.) B 3.) A 4.) A 5.) A 6.) B 7.) B 8.) A 9.) A 10.) A

BLOOD BORNE PATHOGENS QUIZ

Name: _____ Date: _____ Score: _____

Place a check mark on the line with the best answer for each of these 10 questions:

1. Blood borne pathogens are capable of causing disease in humans:
 - a. ___ True
 - b. ___ False
2. Blood borne pathogens can enter the human body through:
 - a. ___ Fingernails and toenails
 - b. ___ Broken skin and mucus membranes
3. In our facility we can be exposed to blood borne pathogens through:
 - a. ___ First aid and clean-up activities
 - b. ___ Production and maintenance work
4. We cannot tell by looking at an individual if he/she has been infected:
 - a. ___ True
 - b. ___ False
5. With Universal Precautions, we do the following:
 - a. ___ Treat all blood and other bodily fluid as if it were contaminated
 - b. ___ Let someone else do our job
6. If a medical emergency occurs and we **do not** have PPE one very important action to take is:
 - a. ___ Perform CPR
 - b. ___ Avoid all contact with blood and other bodily fluid
7. PPE that is always required for responding to any incident is:
 - a. ___ Safety shoes and a hard hat
 - b. ___ Safety glasses and disposable gloves
8. We always do this at the conclusion of an incident:
 - a. ___ Wash our hands
 - b. ___ Have cup of coffee
9. If we think we've experienced an exposure incident we must:
 - a. ___ Wash/flush the area contacted and report the incident
 - b. ___ Hope everything is OK
10. All responders have a right to Hepatitis B vaccinations:
 - a. ___ True
 - b. ___ False

