



OVER THE RAINBOW BUTTERFLY GARDEN EXPOSURE CONTROL PLAN

POLICY

Over the Rainbow Butterfly Garden (OTRBG) is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this endeavor, the following Exposure Control Plan (ECP) is provided to eliminate and/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 agency 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 (PPE)
 - Housekeeping
- Hepatitis B vaccination
- Post-exposure evaluation and follow-up
- Communication of hazards to employees and training
- Procedures for evaluating circumstances surrounding an exposure incident
- Recordkeeping

The methods of implementation of these elements of the standard are discussed in the subsequent pages of this ECP.

PROGRAM ADMINISTRATION

* Kirstin Conlon, OTRBG Supervisor, is responsible for:

- the implementation of the ECP. She will review and update the ECP annually (or more frequently if necessary) to reflect any new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure.
- ensuring that all medical actions required are performed and that appropriate employee health and OSHA records are maintained.

* Kelly Small, Jodi Keogh, Cameron Watson, OTRBG Area Supervisors, will:

- be responsible for training, documentation of training, and making the written

ECP available to employees, OSHA, and NIOSH representatives.

- maintain and provide all personal protective equipment (PPE), as required by the standard.

* Kari Watson, OTRBG Management, will ensure that adequate supplies of PPE are available in the appropriate sizes.

* 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.

EMPLOYEE EXPOSURE DETERMINATION

The following is a list of job classifications in which **some** employees at our agency have occupational exposure. Included is a list of tasks and procedures, or groups of closely related tasks and procedures, in which occupational exposure may occur for these individuals:

JOB TITLE	LOCATION	TASK/PROCEDURE
Direct Care Provider (DSP)	On assignment with Client in home or location required to facilitate Client's daily living activities, i.e. park, restaurant, community center	Handling regulated waste when working with daily needs: Contaminated laundry/bedding/briefs Cuts Rashes Oral needs where blood is involved Nose Bleeds Feminine/Menstruation Needs Semen

METHODS OF IMPLEMENTATION AND CONTROL

Universal Precautions

All employees will utilize Universal Precautions.

Exposure Control Plan

Employees covered by the Bloodborne Pathogens Standard receive an explanation of this ECP during their initial training session. It will also be reviewed in their annual refresher training. All employees have an opportunity to review this plan at any time during their work shifts by logging on to our website, overtherainbowbutterflygarden.com or contacting an OTRBG Area Supervisor. If requested, we will provide an employee with

a copy of the ECP, free of charge and within 15 days of the request.

Engineering Controls and Work Practices

OTRBG is an in-home care agency where care is provided by individual family members or friends within the member's home. Engineering controls and work practice controls should be used to prevent or minimize exposure to bloodborne pathogens. The specific engineering controls and work practice controls to be used are listed below:

- Gloves, masks, eyewear when necessary
- Use of broom/dustpan when handling broken glass
- Use of vacuum with HEPA filter

Sharps and Sharps Disposal Containers are not currently used in the daily living activities of OTRBG's families or homes and are therefore not in the DSP's job description.

OTRBG identifies the need for changes in engineering control and work practices and evaluates new procedures or new products regularly through review of OSHA records and regulations, employee input, and regular review of Department of Economic Safety (DES) standards.

OTRBG's Management and Area Supervisors will ensure effective implementation of these recommendations.

Personal Protective Equipment (PPE)

PPE (gloves) are provided to our employees at no cost to them. Training is provided by OTRBG Supervisors in the use of the appropriate PPE for the tasks or procedures employees will perform. PPE may be obtained by contacting your Area Supervisor.

All employees using PPE must observe the following precautions:

- Wash hands immediately or as soon as feasible after removal of gloves or other PPE.
- Remove PPE after it becomes contaminated, and before leaving the work area.
- Used PPE may be disposed of in proper waste container.
- Wear appropriate gloves when it can be reasonably anticipated that there may be hand 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 barrier is compromised.
- Never wash or decontaminate disposable gloves for reuse.
- Wear appropriate face and eye protection when splashes, sprays, spatters, or droplets of blood or OPIM pose a hazard to the eye, nose, or mouth.
- 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.

Housekeeping

Regulated waste is placed in garbage bags which are closable, constructed to contain all contents and prevent leakage during handling.

The procedure for handling **regulated waste** is by using:

- Universal Precautions
- Proper glove removal technique:
 - Pinch the glove towards the top of the wrist and peel the glove away from your hand, pulling it inside out. Hold the glove you just removed in your gloved hand. Peel off the second glove by putting your fingers inside the glove at the top of your wrist. Turn the second glove inside out while pulling it away from your body, leaving the first glove inside the second. Discard glove in proper receptacle. Wash hands when complete.
- Broom and dustpan used to pick up broken glass and disposed of in proper garbage receptacle

Contaminated sharps are not used within OTRBG's DSP job description.

Laundry

The following laundering requirements must be met:

- handle blood contaminated laundry as soon as possible, with minimal agitation
- wear the following PPE when handling and/or sorting contaminated laundry:
 - Gloves

HEPATITIS B VACCINATION

OTRBG will provide training to employees on Hepatitis B vaccinations, addressing the safety, benefits, efficacy, methods of administration, and availability.

The Hepatitis B vaccination series is available at no cost after training and within 10 days of initial assignment to employees identified in the exposure determination section of this plan. Vaccination is encouraged unless:

- 1) documentation exists that the employee has previously received the series,
- 2) antibody testing reveals that the employee is immune, or
- 3) medical evaluation shows that vaccination is contraindicated.

However, if an employee chooses to decline vaccination, the employee must sign a declination form. Employees who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the vaccination is kept at both the Flagstaff & Phoenix OTRBG locations based on DSP's location.

Vaccination will be provided by a healthcare professional of DSP's choice.

Following the medical evaluation, a copy of the health care professional's Written Opinion will be obtained and provided to the employee. It will be limited to whether the employee requires the Hepatitis vaccine, and whether the vaccine was administered.

POST-EXPOSURE EVALUATION AND FOLLOW-UP

Should an exposure incident occur, contact your Area Supervisor at the following number: Flagstaff | 928-606-1697 / Phoenix | 623-218-3639

An immediately available confidential medical evaluation and follow-up will be conducted by healthcare professional of DSP's choice. Following the initial first aid (clean the wound, flush eyes or other mucous membrane, etc.), the following activities will be performed:

- Document the routes of exposure and how the exposure occurred.
- Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).
- Obtain consent and make arrangements to have the source individual tested as soon as possible to determine HBV, HCV, and HIV infectivity; document that the source individual's test results were conveyed to the employee's health care provider.
- If the source individual is already known to be HBV, HCV and/or HIV positive, new testing need not be performed.
- 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 (e.g., laws protecting confidentiality).
- After obtaining consent, collect exposed employee's blood as soon as feasible after exposure incident, and test blood for HBV and HIV serological status
- If the employee does not give consent for HIV serological testing during collection of blood for baseline testing, preserve the baseline blood sample for at least 90 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.

ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

Kirstin Conlon ensures that health care professional(s) responsible for employee's Hepatitis B vaccination and post-exposure evaluation and follow-up are given a copy of OSHA's bloodborne pathogens standard and also receives 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

Kirstin Conlon also provides the employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

Kirstin Conlon will review the circumstances of all exposure incidents to determine:

- engineering controls in use at the time
- work practices followed
- a description of the device being used (including type and brand)
- protective equipment or clothing that was used at the time of the exposure incident (*gloves, masks, eye shields, etc.*)
- location of the incident (*O.R., E.R., patient room, etc.*)
- procedure being performed when the incident occurred
- employee's training

If it is determined that revisions need to be made, Kirstin Conlon will ensure that appropriate changes are made to this ECP.

EMPLOYEE TRAINING

All employees who have occupational exposure to bloodborne pathogens receive training conducted by OTRBG who has Supervisors that are certified in Bloodborne Pathogens & Direct Care Worker (DCW) training.

All employees who have occupational exposure to Bloodborne Pathogens receive training on the epidemiology, symptoms, and transmission of Bloodborne Pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

- a copy and explanation of the standard
- an explanation of our ECP and how to obtain a copy
- an explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
- an explanation of the use and limitations of engineering controls, work practices, and PPE

- an explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE
- an explanation of the basis for PPE selection
- information on the Hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine will be offered free of charge
- information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM
- an explanation of the 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
- information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
- an explanation of the signs and labels and/or color coding required by the standard and used at a facility that incorporates the usage of sharps
- an opportunity for interactive questions and answers with the person conducting the training session.

Training materials for this facility are available online during normal business hours of Monday-Friday from 10am – 6pm. If alternative time is needed, an appointment can be scheduled by contacting 928-606-1697.

RECORDKEEPING

Training Records

Training records are completed for each employee upon completion of training. These documents will be kept for at least **three years** at 2722 N. West Street, Flagstaff, AZ 86004.

The training records include:

- the dates of the training sessions
- the contents or a summary of the training sessions
- the names and qualifications of persons conducting the training

Employee training records are provided upon request to the employee or the employee's authorized representative within 15 working days. Such requests should be addressed to your Area Supervisor.

Medical Records

Medical records are maintained for each employee with occupational exposure in accordance with 29 CFR 1910.1020, "Access to Employee Exposure and Medical Records."

OTRBG is responsible for maintenance of the required medical records. These **confidential** records are kept at 2722 N. West Street, Flagstaff, AZ 86004 for at least the

duration of employment plus 30 years.

Employee medical records are provided upon request of the employee or to anyone having written consent of the employee within 15 working days. Such requests should be sent to Kirstin Conlon at 623-218-3639.

OSHA Recordkeeping

An exposure incident is evaluated to determine if the case meets OSHA's Recordkeeping Requirements (29 CFR 1904). This determination and the recording activities are done by Kirstin Conlon.

Sharps Injury Log

OTRBG does not incorporate the use of sharps within DSP job descriptions. Should our employees begin the use of sharps, all percutaneous injuries from contaminated sharps will also be recorded in a Sharps Injury Log. If a Sharps incident occurs, all incidences will include at least:

- the date of the injury
- the type and brand of the device involved
- the department or work area where the incident occurred
- an explanation of how the incident occurred.

This log will be reviewed at least annually as part of the annual evaluation of the program and will be maintained for at least five years following the end of the calendar year that they cover. If a copy is requested by anyone, it must have any personal identifiers removed from the report.

Protect yourself.

Protect your family.

Protect the public.



How can a correctional health care worker be exposed to bloodborne pathogens on the job?

- Needlesticks or cuts from used needles or sharps.
- Contact of your eyes, nose, mouth, or broken skin with blood.
- Assaults – bites, cuts, or knife wounds.
- Splashes or punctures – especially when drawing blood.

How can you protect yourself?

- Get the hepatitis B vaccine.
- Read and understand your employer's Exposure Control Plan.
- Dispose of used sharps promptly into an appropriate sharps disposal container.
- Use sharps devices with safety features whenever possible.
- Use personal protective equipment (PPE), such as gloves and face shields, every time there is a potential for exposure to blood or body fluids.
- Clean work surfaces with germicidal products.

What should you do if you're exposed?

- Wash needlesticks and cuts with soap and water.
- Flush splashes to nose, mouth, or skin with water.
- Irrigate eyes with clean water, saline, or sterile wash.
- Report all exposures promptly to ensure that you receive appropriate followup care.

For additional information:

- Centers for Disease Control and Prevention (CDC)
Telephone: 1-800-CDC-INFO
TTY: 1-888-232-6348
www.cdc.gov/ncidod/dhqp/bp.html
- National Institute for Occupational Safety and Health (NIOSH)
Telephone: 1-800-CDC-INFO
TTY: 1-888-232-6348
www.cdc.gov/niosh/topics/bbp/correctional

Protect yourself today— be there for your family tomorrow.

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NIOSH National Institute for
Occupational Safety and Health