

# Bloodborne Pathogens Exposure Control Plan for

AbleNet, Inc.

## **POLICY**

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AbleNet, Inc. 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 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 firm 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 an exposure incident

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

## **PROGRAM ADMINISTRATION**

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The Compliance Officer is responsible for the implementation of the ECP and will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures.

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.

The Compliance Officer is responsible for:

- Maintaining and providing all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard.
- Ensuring that all medical actions required are performed and that appropriate employee health and OSHA records are maintained.
- The Compliance Officer is responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives.

## **EMPLOYEE EXPOSURE DETERMINATION**

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The following is a list of all job classifications at our establishment in which **all** employees have occupational exposure:

<b>JOB TITLE</b>	<b>DEPARTMENT/LOCATION</b>
Technical Support (All positions)	Tech Support – US
Electronic Assembly/Assembly	Tech Support – US
Receiving Clerk	Warehouse Receiving - US
Business Development	Sales - US

## **UNIVERSAL PRECAUTIONS**

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This organization embraces “universal precautions”, which is a method of infection control that requires the employer and employee to assume that all human blood and specified human body fluids are infected with bloodborne pathogens. Where it's difficult or impossible to identify body fluids, all are to be considered potentially infectious.

## **ENGINEERING CONTROLS**

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Engineering controls refer to controls that isolate or remove the bloodborne pathogens hazard from the workplace. AbleNet uses the follow engineering control:

- All contaminated equipment will be placed in the contaminated area of the service section until it is sanitized.

## **WORK PRACTICE CONTROLS**

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Work practice controls refer to controls that reduce the likelihood of exposure by altering the manner in which a task is performed. Wash hands with soap and water after using the toilet

- Eating and drinking is not allowed in the service area

## **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

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PPE refers to specialized clothing or equipment worn by an employee for protection against a hazard.

PPE is provided to our employees at no cost to them. Training is provided by the Compliance Officer in the use of the appropriate PPE for the tasks or procedures employees will perform. PPE will be chosen based on the anticipated exposure to blood or other potentially infectious material. PPE will be considered appropriate only if it does not permit blood or other potentially infectious material to pass through or reach the employees' clothing, skin, eyes, mouth, or other mucous membranes under normal conditions of use and for the duration of time which the protective equipment will be used.

The following types of PPE are available in the technical support/shipping area:

- Cleaning Supplies
- Gloves
- Protective Eyewear

PPE is required for the following tasks:

<b>TASK</b>	<b>REQUIRED PPE</b>
Cleaning Devices	Latex Gloves, Cleaning Supplies
	Protective Eyewear

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.
- 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 a barrier is compromised
- Utility gloves may be decontaminated for reuse if their integrity is not compromised; discard utility gloves if they show signs of cracking, peeling, tearing, puncturing, or deterioration.
- 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.

The procedure for handling used PPE is as follows:

Gloves and any other supplies are thrown in the garbage and garbage is disposed of daily.

## **HOUSEKEEPING**

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This facility will be cleaned and decontaminated according to the following schedule:

Cleaning staff clean the area 3 times per week. AbleNet staff will clean as needed.

**REGULATED WASTE - AbleNet does not anticipate encountering any regulated waste. Should that change the following will apply.**

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Regulated waste refers to the following:

- Blood in liquid or semi-liquid form, or other potentially infectious materials, including saliva in dental procedures
- Items that would release blood or other potentially infectious materials if compressed
- Contaminated sharps
- Pathological and microbiological waste containing blood or other potentially infectious materials
- Items that are caked with dried blood or other potentially infectious materials and that have the ability to release these materials while being handled.

Regulated waste is placed in red containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled with the word “Biohazard”, and closed prior to removal to prevent spillage or protrusion of contents during handling.

Contaminated sharps are discarded immediately or as soon as possible in red containers that are closable, puncture-resistant, leak-proof on sides and bottoms, and labeled with the word “Biohazard”.

All regulated waste (**if applicable**) will be picked-up and disposed of by Advanced Disposal company.

## **LABELS**

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Fluorescent orange or orange-red warning labels must be attached to containers of regulated waste, to refrigerators and freezers containing blood and other potentially infectious materials, and to other containers used to store, transport, or ship blood or other potentially infectious materials. Labels are *not* required when: (1) red bags or red containers are used; (2) containers of blood, blood components, or blood products are labeled as to their contents and have been released for transfusion or other clinical use; and (3) individual containers of blood or OPIM are placed in a labeled container during storage, transport, shipment, or disposal. The warning

label must be fluorescent orange or orange-red, must contain the biohazard symbol and the word BIOHAZARD in a contrasting color, and must be attached to each object by string, wire, adhesive, or another method to prevent loss or removal of the label.

The Compliance Officer will ensure warning labels are affixed or red bags are used if regulated waste or contaminated equipment is brought into the facility and will provide appropriate labels and/or containers, when applicable.

## **HEPATITIS B VACCINATION**

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The Compliance Officer will provide training to employees on hepatitis B vaccinations, addressing the safety, benefits, efficacy, methods of administration, and availability.

Vaccination will be provided by HealthPartners.

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.

## **POST-EXPOSURE EVALUATION AND FOLLOW-UP**

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An exposure incident refers to an employee's exposure to or contact with blood or OPIM through broken skin; through the eyes, nose, or mouth; or by means of a wound such as a needle stick.

Should an exposure incident occur, contact the Compliance Officer.

A confidential medical evaluation and follow-up will be made immediately available through a physician at no cost to the employee.

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.
- If the incident involved a needle or sharp, document the type and brand of device involved in the incident.
- 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 HIV, HCV, and HBV 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 HIV, HCV and/or HBV 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**

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The Compliance Officer ensures that the 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.

The Compliance Officer ensures that the health care professional evaluating an employee after an exposure incident receives the following:

- A description of the employee's job duties relevant to the exposure incident
- Route(s) and circumstances of exposure
- If possible, results of the source individual's blood test
- Relevant employee medical records, including vaccination status

The employee will be provided a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

The health care professional's written opinion to the employer must be limited to whether Hepatitis B vaccination was recommended and if the employee has received a vaccination.

## **EMPLOYEE TRAINING**

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All employees who have occupational exposure to bloodborne pathogens receive training within 10 days of initial assignment and annually thereafter.

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
- 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 this facility
- An opportunity for interactive questions and answers with the person conducting the training session.

## **RECORDKEEPING**

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### Training Records

Training records are completed for each employee upon completion of training. These documents will be kept for at least three years at AbleNet.

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
- The names and job titles of all persons attending the training sessions

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 AbleNet, Inc., 2625 Patton Road, Roseville, MN 55113.

### Medical Records

Medical records including Hepatitis B vaccination status and/or Hepatitis B Vaccination Declination Form are maintained for each employee with occupational exposure in accordance with 29 CFR 1910.20, "Access to Employee Exposure and Medical Records." Human Resources is responsible for maintenance of the required medical records. These confidential records are kept at 2625 Patton Road, Roseville, MN 55113 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 AbleNet, Inc., 2625 Patton Road, Roseville, MN 55113.

### OSHA Recordkeeping

Each 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 the Compliance Officer.

## **PROGRAM REVIEW**

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The Compliance Officer is responsible for reviewing this program and its effectiveness and for updating it as needed at least annually or following an exposure incident.

Date Reviewed: \_\_\_\_\_

Employee Name: \_\_\_\_\_

Employee Signature: \_\_\_\_\_