



# Bloodborne Pathogen Exposure Control Plan

Administered by:
Chapman University
Environmental Health & Safety Department / Risk
Management Department

Plan Developed and Approved by the Chapman University Bloodborne Pathogen Exposure Control Committee Updated April 2022

Developed in accordance with Cal OSHA Bloodborne Pathogens Standard 8 CCR 5193

# **Bloodborne Pathogen Exposure Control Plan**

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# **Chapman University Bloodborne Pathogen Exposure Control Plan**

#### **PURPOSE**

This plan describes procedures that will reduce the potential for occupational exposures to Bloodborne infectious disease according to the requirements of Cal OSHA Bloodborne Pathogens Standard 8 CCR 5193.

The plan applies to all employees and/or students of Chapman University who may be exposed to human blood, blood components, body fluids or other potentially infectious materials (OPIM) in connection with the performance of their duties. While the rules and regulations of the Federal (OHSA) and California (Cal/OSHA) Occupational Safety and Health Administration apply to employees, Chapman University applies these precautions to all students who have related exposures in connection with their academic activities. Throughout this document the term 'worker' is used to encompass everyone who is covered by this plan.

Bloodborne pathogens include but are not limited to hepatitis B (HBV), hepatitis C (HCV) and human immunodeficiency virus (HIV). Under this plan a "sharp" includes any object that can be reasonably anticipated to penetrate the skin and result in an exposure to Bloodborne pathogens. If you have any questions regarding the applicability of this Plan to you and your position, please contact your supervisor or the Risk Manager, Chapman University Environmental Health & Safety.

Sharps used at Chapman University include, but are not limited to, needle devices, scalpels, lancets, broken glass and broken capillary tubes. However, it is recognized that exposure to Bloodborne pathogens can also result from non-sharps related incidents. The purpose of this exposure control plan is to eliminate or minimize worker occupational exposure to blood or other infectious body fluids. Other potentially infectious body fluids include: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, and any body fluid visibly contaminated with blood such as saliva or vomitus, and all body fluids in situations, such as emergency response, where it is difficult or impossible to differentiate between body fluids. This Chapman University "Bloodborne Pathogen Control Plan" describes how to eliminate or minimize exposure of all University personnel to human/primate blood or human/primate blood products that might contain Bloodborne pathogens. This plan is in compliance with the California OSHA Bloodborne Pathogens Standard (8 CCR 5193).

This Plan also provides for the establishment of a Chapman University Bloodborne Pathogen Control Committee that is charged with the development and ongoing management of the Chapman University Bloodborne Pathogen Control Plan. The Committee will meet annually to review the Plan for any necessary updates, and to review any incidents that occurred during the period of time subsequent to the previous annual review. The Committee will also meet periodically, as needed in response to incidents that require further investigation and management.

Any sharps or non-sharps related incident that involves possible exposure to bloodborne pathogens must be reported with the Chapman University "Incident/Accident Investigation Report". The report form can be found at <a href="https://www.chapman.edu/faculty-staff/risk-management/reporting.aspx">https://www.chapman.edu/faculty-staff/risk-management/reporting.aspx</a>. Incidents that involve students, faculty, staff or others that do not involve exposure to Bloodborne pathogens should still be promptly reported to the Chapman University Risk Management by using this form. Also, if a worker, including student workers, is injured as a result of the incident, a report should immediately be made to the Employee Leave Coordinator/Workers' Compensation Specialist in the Human Resources Department.

#### RESPONSIBILITY

The Supervisor of the individual, including faculty and/or staff, shall be responsible for ensuring their workers comply with the provisions of this plan. The management of each respective department where there are known sources of exposure, i.e. an exposure because of an actual injury caused by a bloodborne pathogen are responsible for providing all necessary supplies such as personal protective equipment, soap, bleach, etc. Chapman University Environmental Health & Safety can be of assistance in identifying sources of necessary supplies. Most of these supplies are available through university-approved vendors. The Environmental Health and Safety Department shall be responsible for providing the appropriate resources for the disposal of biohazardous waste.

#### CONTRACT SERVICES

Companies contracting services to Chapman University, that involve their employee exposure to Bloodborne pathogens, must have their own exposure control plan. Contractors must train their employees in accordance with the OSHA regulations including information that is specific to job duties at Chapman University. A signed Contractor Illness and Injury Prevention Program Certification form must be provided to the University prior to the start of work. It is the responsibility of the contracting department at Chapman University to assure compliance by any and all contractors.

#### EXPOSURE DETERMINATION

Persons working in the job classifications listed below perform duties which could result in exposure to bloodborne pathogens. This is not an all-inclusive list, as this risk may be present in a wide variety of environments and duties. Specific activities that present a risk of exposure are listed after each classification. Supervisors must be aware of changes in duties of their personnel that may result in the potential of exposure and must promptly advise the Chapman University Environmental Health & Safety department of same. If employees of the University are injured, the reporting should also include Human Resources.

NOTE: The requirements of this Plan apply to full-time and part-time employees of the University, including student workers. The University applies the same precautions to all students or other persons whose work may result in this exposure. The classification of some graduate students receiving stipends or grants, or fellowships may vary. If you have an incident involving any such individual, contact Risk Management and our office will collaborate with Human Resources to identify any employment relationship.

This policy does not apply to independent contractors or visitors who are not Chapman employees or students. If there are any questions on eligibility, or if a new position is added in which you believe there to be a possible exposure, contact the Chapman University Environmental Health & Safety.

Job classifications in which all workers may have occupational exposure:

- Healthcare Professionals, including professional and support positions rendering examinations or delivering other medical or nursing procedures, administration of injections, medications, or first aid.
- Science Department faculty and other staff, including laboratory technicians who may be involved in the handling of potential contaminants, including but not limited to the collection and handling of bodily fluid specimens
- 3. Physical Therapy Department, including but not limited to faculty, lab instructors, and student workers.
- 4. School of Pharmacy, including but not limited to faculty, lab instructors, and student workers.
- 5. Physician Assistant Program, including but not limited to faculty, lab instructors, and student workers.
- 6. Athletic Trainer first aid provider
- 7. Public Safety personnel first aid provider, interaction with violent suspects, searches

- 8. Lifeguards first aid provider
- 9. Other workers who perform duties included above, regardless of position/title.

#### Job classifications in which some workers may have some occupational exposure:

- 10. Instructional Support Technician handling of laboratory specimens and waste.
- 11. Maintenance Worker Cleaning up after accidents and working around sharp objects and tools.
- 12. Science Faculty research and laboratory activities for those who conduct research or work with human blood or OPIM, or animals known to harbor human Bloodborne pathogens and or animal tissue from a source injected with or containing viable human Bloodborne pathogens.
- 13. Coaches and Assistant Coaches.
- 14. Residence Life workers, including Resident Advisors and maintenance personnel assigned to Residence Life.
- 15. All workers and students providing emergency first aid assistance, whether on voluntary basis or in connection with job responsibilities.
- 16. Physician Assistant Studies Program faculty, lab instructors, students.
- 17. Physical Therapy faculty, lab instructors, students.
- 18. School of Pharmacy, faculty, lab instructors, students.

#### EXPOSURE/MATERIALS

The following are potential sources of exposure:

- All moist body substances, including semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, and other body fluid that is visibly contaminated with blood such as saliva or vomitus, and all body fluids in situations, such as emergency response, where it is difficult or impossible to differentiate between body fluids.
- 2. Any unfixed human or primate tissue or organ (other than intact skin) from a human (living or dead).
- 3. Any HIV, HBV, HCV-containing cell or tissue culture, organ cultures, and medium, and other solutions, and blood, organs, or other tissues from experimental animals containing HIV, HBV, or HCV.

#### **EXPOSURE CONTROLS**

The following practices will be implemented to reduce the potential for occupational exposure to Bloodborne pathogens. Additional exposure control procedures will be developed by clinic or laboratory supervisors as needed for specialty work environments. Supervisors are responsible for ensuring that workers implement exposure control measures and are trained to use required personal protective equipment (PPE). Workers who fail to implement exposure control measures or utilize PPE as required are subject to corrective action.

# **Universal Precautions (aka Standard Precautions)**

Universal/Standard precautions require that all blood and body fluids be treated as if they are infected with HBV, HCV, HIV or other pathogens. If the nature of the task requires direct contact with potentially infectious materials, PPE shall be available and worn. If an activity is performed without blood exposure, but exposure could occur in an emergency, PPE shall be available.

Universal/Standard precautions are intended to supplement, rather than replace, work practice controls.

#### Workers must:

1. Utilize protective equipment in occupational exposure situations.

- 2. Remove garments that become penetrated by blood or other potentially infectious material immediately or as soon as feasible.
- 3. Replace all garments that are torn or punctured, or that lose their ability to function as a barrier to Bloodborne pathogens.
- 4. Remove all personal protective equipment before leaving the work area.
- 5. Place all garments in the appropriate designated area or container for storage, cleaning, decontamination, or disposal.

# Research Involving HBV, HCV, or HIV

Research involving HBV, HCV, or HIV must be reviewed by the Institutional Biosafety Committee (IBC) and the Biological Safety Officer (BSO) prior to the start of work. Any research involving these viruses must be at a BSL-2 level. Additional administrative controls, protective equipment and training may be required. The hepatitis B vaccine should also be considered for all research personnel who may be at occupational risk for exposure to HBV.

## **Engineering and Work Practice Controls**

Universal/Standard precautions as well as engineering and work practice controls will be observed by all persons in order to prevent contact with blood or other potentially infectious materials. All blood or other potentially infectious materials will be considered infectious regardless of the perceived status of the source individual. Safe practices shall include:

#### 1. Security and Isolation:

- a. Keep laboratory doors closed when work is performed with Bloodborne pathogens. The area must be posted by placing the biohazard sign on entrance doors.
- b. Lock any biohazard work areas when unattended.

#### 2. Hand and General Washing Hygiene:

- a. Personnel must wash their hands or other skin with soap and water, or flush mucous membranes with water, as soon as possible following an exposure incident (such as a splash of blood to the eyes or an accidental needle stick).
- Personnel must wash their hands immediately (or as soon as feasible) after removal of gloves or other personal protective equipment and upon any contact with potential BBP materials.
- c. Personnel shall familiarize themselves with the nearest hand washing facilities for the buildings in which they work. All research areas, medical areas, and laboratories will have hand washing sinks /faucets available.
- d. Because most Chapman University buildings are public access, they will have available hand washing facilities in public restrooms and custodial/janitorial closets. (If hand washing facilities are not available, the Facilities Department will provide either an antiseptic cleanser in conjunction with clean cloth/paper towels or antiseptic towelettes. If these alternatives are used, then the hands are to be washed with soap and water as soon as feasible.)
- 3. Sharps: Workers who encounter improperly disposed "sharps" which includes razors, pipettes, scalpel blades, etc. as well as needles shall notify EH&S of the location of the "sharps". Additionally, the appropriate authorities at the location shall be notified (i.e., lab manager). Needles shall be disposed of in labeled sharps containers provided at the location. If sharps containers are not available at that location, please contact EH&S regarding pick up and dispose of the "sharps" in an appropriate, labeled sharps container.

- a. Needles (sharps or broken glass) may be moved or picked up only by using a mechanical device or tool (forceps, pliers, broom and dust pan).
- b. Used needles and other sharps are not to be sheared, bent, broken, recapped, or resheathed by hand.
- c. Do not bend, recap or remove sharps from devices unless a mechanical device or a one- handed technique is used, and the employer can demonstrate that no alternative is available.
- Used needles are not to be removed from disposable syringes. Disposable sharps must not be reused.
- e. All sharps contaminated or not, shall be disposed of in a puncture-resistant hard sided, labeled sharps container.
- f. The CAL-OSHA BBP Standard requires any laboratory using human or primate blood, blood products, cell lines, tissues or other potentially infectious materials to use Needleless Systems/and or engineered sharps unless such devices prove to be more hazardous to the user. Needleless systems means a device that does not use needles
  - (1) for the withdrawal of body fluids after initial venous or arterial access is established;
  - (2) for administration of medication or fluids; and (3) for performance of any other procedure involving the potential for an exposure incident. Engineered sharps means either (1) a physical attribute built into a needle device such as barrier creation, blunting, encapsulation, withdrawal or (2) a physical mechanism which effectively reduces the risk of an exposure incident. If the PI/supervisor decides that a non-compliant "sharp" is necessary for a certain procedure, the reason must be documented.
- g. Any broken glassware must not be directly handled with a gloved or bare hand. Use a mechanical tool (tongs, dustpan and broom) to collect the pieces into a hard-sided container labeled 'broken glass.' Contaminated broken glass must be placed in a puncture-resistant hard sided container (marked as biohazard), and disposed of as biohazardous waste.
- 4. **Food:** Do not eat, drink, smoke, apply cosmetics or lip balm, or handle contact lenses in areas where there is a reasonable likelihood of exposure to Bloodborne pathogens.
- 5. Exposure Areas: No food or drinks shall be kept in refrigerators, freezers, cabinets, shelves, or on counter tops or bench tops where blood or other potentially infectious materials (OPIM) are present. Note: Any refrigerators located in separate office areas that are used for the holding of food or beverage for human consumption must be posted with a "Food Storage Only" label.
- 6. **Safe Practices**: Workers must perform all procedures involving blood or other potentially infectious materials in such a manner as to minimize splashing, spraying, splattering, and generation of droplets of these substances. Never pipette by mouth.
- 7. **Specimens:** Place specimens of blood or OPIM in a container.
- 8. **Minimization of Aerosols:** All procedures must be performed carefully to minimize the creation of aerosols. Biological safety cabinets (Class I or II) or other physical containment devices must be used whenever possible while performing operations capable of creating aerosols, including but not limited to:
  - 1. centrifugation
  - 2. blending
  - 3. homogenization
  - 4. opening pressurized containers.

If a biological safety cabinet cannot be used, the most effective means of minimizing exposure to aerosols is to contain them by using closed containers (centrifuge tubes, sealed centrifuge rotors, capped test tubes, etc.).

- 9. Disinfection of work area and spill cleanups: Blood and blood products shall be handled in an area that can be readily decontaminated. The work area must be disinfected before and after handling microorganisms. Non-laboratory (authorized) personnel should not handle equipment that has been used with potential BBP's. Any potentially contaminated equipment must be appropriately decontaminated. All spills must be cleaned up immediately and disinfected with a germicide by appropriate decontamination procedures as determined by the laboratory supervisor and/or EH&S Manager. Clean-up, including transportation and disposal must be done in consultation with the EH&S in a manner that is in compliance with the Housekeeping and Waste Disposal practices described in this Plan and all applicable rules and regulations. The laboratory supervisor or other laboratory personnel must immediately report laboratory accidents (major spills, injuries, illnesses) to EH&S. Any injuries to workers or students must be immediately reported to Risk Management/Environmental Health & Safety.
- 10. Labeling: A biohazard warning sign incorporating the universal biohazard symbol shall be posted on the access door to the laboratory work area. All human tissue, body fluid, or other potentially infectious materials must be stored in a container labeled with a biohazard symbol. Refrigerators, freezers, incubators, or other pieces of equipment where potentially infectious materials are stored or handled must also be labeled with the biohazard symbol. All signs are available from EH&S. Any refrigerators located in separate office areas that are used for the holding of food or beverage for human consumption must be posted with a "Food Storage Only" label.
- 11. Limited Access: Access to a laboratory is limited or restricted by the laboratory supervisor when work is in progress. When work with blood or blood products is being performed, non-laboratory personnel (maintenance, administrative personnel) and non-Chapman University personnel should not enter area. Maintenance and building services personnel may be unfamiliar with the potential hazards present in a laboratory and must be fully instructed and carefully supervised by the laboratory supervisor when working in areas where human blood and blood products are handled.
- 12. **Transportation on Campus:** Specimens of blood or other potentially infectious materials shall be placed in a primary container that prevents leakage (capped test tube, centrifuge tube, etc.) during collection, handling, and storage. If the specimens are transported through hallways, the primary containers must be placed in a secondary container (bucket, beaker, cooler, etc.) which would contain the contents if the primary container were to leak or break. The Chapman University Environmental Health & Safety Specialist should be contacted to assist in the transportation of any such specimens on campus.
- 13. **Shipping of samples:** Specimens of blood or other potentially infectious materials that will be shipped to or from Chapman University must be clearly identified as human blood or blood products. The material shall be placed in a closed primary container and a leak proof secondary container prior to shipment. Personnel involved with shipping of biohazardous agents or potential BBPs must have documented training prior to shipping. Contact the Chapman University Environmental Health & Safety Specialist for more detailed guidelines and training prior to any shipping of samples or specimens.
- 14. **Blood Collection -** All human blood collection within Chapman University shall be performed in accordance with established phlebotomy procedures.

**EXCEPTIONS:** Engineering controls are not required if they are not available in the marketplace or if a licensed healthcare professional, directly involved in a patient's care, determines that the use of the engineering control will jeopardize the patient's safety or the success of a medical procedure. Engineering controls are not required if the employer can demonstrate by means of objective product evaluation criteria that the control is no more effective in preventing exposure incidents than the alternative used by the employer. The justification for safety and product evaluation determinations

must be documented in writing.

#### **HOUSEKEEPING:**

After contact with potentially infectious material, all equipment and work surfaces shall be promptly cleaned with a disinfectant, capable of killing HIV and hepatitis consistent with the guidelines of the Center for Disease Control and Prevention (CDC). A 1:10 hypochlorite solution is effective for decontamination and can be prepared by slowly adding 1/4 cup household bleach to 2 cups of water. (This is a 1:8 solution – also is the same description as the one below – the 10% chlorine bleach)

- Decontamination will also be accomplished by utilizing the following materials:
  - 10% (minimum) solution of chlorine bleach
  - Other EPA-registered disinfectants

https://www.epa.gov/pesticide-registration/selected-epa-registered-disinfectants

- Any other disinfectant with a label stating that it is effective in killing HIV and hepatitis may also be used.
- Clean up and decontamination should only be conducted by persons who have completed Bloodborne pathogen exposure control training and who understand the hazards of the contaminant.
- Use housekeeping gloves as a physical barrier during decontamination. They may be washed, disinfected prior to being reused. Additional PPE should be worn if splash hazards exist.
- All contaminated work surfaces, tools, objects, etc. will be decontaminated immediately or as soon as feasible after any spill of blood or other potentially infectious materials. The bleach solution or disinfectant must be left in contact with contaminated work surfaces, tools, objects, or potentially infectious materials for at least 10 minutes before cleaning.
- Equipment that may become contaminated with blood or other potentially infectious materials will be examined and decontaminated before servicing or use. This must be documented.
- Broken glassware will not be picked up directly with the hands. Sweep or brush material into a dustpan.
- Known or suspected contaminated sharps shall be discarded immediately or as soon as feasible in containers that are closable, puncture-resistant, leak-proof on sides and bottom, and marked with an appropriate biohazard label. If sharps container is not pre-labeled, biohazard labels are available through the Chapman University EH&S department.
- When containers of contaminated sharps are being moved from the area of use or discovery, the containers shall be closed immediately before removal or replacement to prevent spillage or protrusion of contents during handling, storage, transport, or shipping.
- Containers shall not be opened, emptied, or cleaned manually or in any other manner that would expose anyone to the risk of percutaneous injury.

#### LAUNDRY PROCEDURES:

- Laundry contaminated with blood or other potentially infectious material will be handled as little
  as possible. Such laundry will not be sorted or rinsed in the area of use.
- Contaminated laundry shall be placed and transported in (plastic or other non-porous) bags labeled biohazardous.

EH&S shall review and approve any policies and procedures regarding the cleaning or disposal
of contaminated laundry. EH&S shall be notified of any changes to existing practice and shall
approve vendors utilized for the purpose of cleaning or disposal of contaminated laundry.

#### **WASTE DISPOSAL:**

- Place all sharps waste in rigid, red containers labeled "Biohazard." Proper procedure requires that all sharps be disposed of this way, (including contaminated and non-contaminated sharps) immediately following use. Use a mechanical means such as tongs, brush or forceps to pick up contaminated broken glassware. Never attempt to access items inside a sharps containers. Cease using a sharps container when the container is 3/4 full. Never force sharps into a full container. Workers may contact Chapman University Student Health Services (CUSH) or the Manager, EH&S for information on disposal of sharps on campus.
- Sharps containers may be used for as long as it takes to reach capacity of the container. If the
  container contains organic putrefying material, the retention time period is 7 days unless stored
  in a freezer.
- Biohazard containers must be closed when moved to prevent spillage or sharp protrusion. Use a rigid secondary container to prevent leakage during handling and transport. The secondary container must bear the biohazard label.
- The waste must be labeled and closed before removal to prevent spillage or protrusion of contents during handling, storage, or transport.
- Incineration of biohazardous waste shall be handled by a biological waste destructor. This shall be coordinated through the EHS and your department.
- Chapman University contracts with Veolia, Inc. for regular pickup of sharps and other biohazardous waste.

## PERSONAL PROTECTIVE EQUIPMENT:

Personnel must wear gloves, lab coat, and safety glasses whenever handling human or primate blood, fluids, or tissue. In addition to above items, personnel must wear any additional PPE (apron, booties, face shield, etc.) that is needed to prevent blood or other potentially infectious material from contaminating their street clothes, skin, eyes, mouth, or other mucous membranes under normal conditions.

Personal protective equipment (PPE) will be provided without cost to all individuals who are at risk of occupational exposure to Bloodborne pathogens. All PPE must be inspected, cleaned, or replaced as needed at no cost to personnel. PPE will be chosen based on the anticipated exposure to blood or other potentially infectious materials. The protective equipment will be considered appropriate only if it does not permit blood or other potentially infectious materials to pass through or reach the individual's 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.

All PPEs must be selected with the goal of providing protection from a hazard. Selection of alternate choices of PPE should be considered if the user is at risk of physiological discomfort (such as contact dermatitis from latex gloves or asthma from wearing certain face masks). Proper training on the wearing and function of personal protective equipment is required PRIOR to using PPE. Consultation or advice on PPE is provided by Chapman University EH&S.

Where occupational exposure remains after institution of engineering and work controls, personal protective equipment shall also be utilized. Department managers will be responsible for providing

PPE appropriate to the tasks and type of exposure potential within their department at no cost to their workers. They will replace or repair personal protective equipment as necessary at no cost to workers.

All personal protective equipment will be chosen based on the anticipated exposure to blood or other potentially infectious materials. The protective equipment will be considered appropriate only if it does not permit blood or other potentially infectious materials to pass through or reach the worker's clothing, skin, eyes, mouth, or mucous membranes under normal conditions of use and for the duration of time for which the protective equipment will be used.

All PPE shall be removed prior to leaving the work areas and placed in designated areas for disinfection or disposal. At no time will personnel be permitted to take home any PPE, including lab coats, for laundering or cleaning.

Information on specific use of PPE is as follows:

#### Eye protection

Protective eye wear must be worn in the laboratory or any other environment when it is reasonably anticipated that blood or other potentially infected material may make contact with the mucous membranes of the eye. Wear masks, goggles, glasses with side shields, or chinlength face shields, singularly or in combination, whenever splashes, sprays, splatters, aerosols or droplets of potentially infectious material may be generated and eye, nose or mouth contamination can be reasonably anticipated.

#### Lab coats and uniforms

Wear protective clothing, such as aprons, lab coats or gowns if the potential for soiling the worker's street clothing exists. Closed toe shoes are required as part of the protective clothing ensemble. If blood or OPIM penetrates a garment, remove it immediately. Keep reusable PPE such as lab coats and household gloves clean. Store them in the work area. (*Do not wear them outside of the work area*).

Laboratory coats, gowns, smocks, aprons, or uniforms must be worn while in the laboratory; long sleeves are required. Before leaving the laboratory for non-laboratory areas (e.g., cafeteria, library, administrative offices), this protective clothing must be removed and left in the laboratory. Sandals and open-toed shoes are not permitted.

#### **Gloves**

All personnel engaged in activities that may involve skin contact with blood, other potentially infectious fluids, mucous membranes or tissues must wear gloves. Gloves are also required for laboratory workers with dermatitis or other lesions on the hands who may have direct or indirect contact with potentially infectious materials.

Ensure the correct glove is chosen for the specific task. Safety Data Sheets (SDS) and Standard Operating Procedures (SOP) should be consulted when determining the type of glove to be worn.

Hand washing with soap and water must be a routine practice immediately after direct contact with potentially infectious materials and on completion of work, even when gloves are worn.

Gloves should be removed before touching common equipment (phone, computer, appropriate laboratory equipment) to prevent contamination.

Gloves must be replaced frequently and immediately if they become contaminated or damaged in any way. Do not wash or disinfect examination gloves for reuse. Properly dispose of all such gloves (in labeled Biohazard receptacles).

#### BIOLOGICAL WASTE DISPOSAL

Disposal of potentially hazardous biological materials shall be performed with appropriate consideration for the personnel involved in the handling of laboratory waste, as well as federal, state and local laws concerning the disposal of such materials. In accordance with the California Medical Waste Management Act, Health and Safety Code, Chapter 6.1, medical waste includes but is not limited to:

- Human or animal specimens or infectious cultures
- · Sharps, including needles and syringes
- Cultures and stocks of infectious agents
- Wastes from the production of bacteria, viruses, or the use of spores, discarded live and attenuated vaccines, and culture dishes and devices used to transfer, inoculate, and mix cultures
- Animal parts, tissues, fluids, or carcasses suspected by the attending veterinarian of being contaminated with infectious agents contagious to humans
- Waste which contains recognizable blood, fluid blood products, containers or equipment containing blood, or blood from animals known to be infected with diseases which are communicable to humans. Specific procedures for the disposal of biological materials are available from EH&S.

#### REPORTING AND DOCUMENTING INCIDENTS

## Post-Exposure Evaluation and Follow-up

An exposure incident is a specific eye, mouth, mucous membrane or non-intact skin penetration by blood or other potentially infectious material (OPIM). Occupational exposures to blood or OPIM should be treated within hours.

Immediately after contact with blood or OPIM, wash skin with soap and water or flush mucous membranes with copious amounts of water for a minimum 15 min. Promptly report any exposure incidents to the supervisor and initiate referral to an appropriate source of medical care. The worker's immediate supervisor or other responsible management representative will complete the Supervisors Report of Accident Form and refer the worker for immediate treatment and/or referral. If the exposure resulted from the delivery of first aid, the Report of Accident Form should include a list of all other persons who were involved in providing first aid.

If possible, the University will provide in-house post exposure evaluation. Students should go to the student health center, Concentra or their own physician. The worker must be advised of their right to refuse to consent to post-exposure evaluation. The worker may be referred to Concentra Urgent Care (15751 Rockfield Blvd, Irvine near the Rinker Campus or 1045 North Tustin, Tustin near the Orange Campus) for a confidential medical evaluation and follow-up. The Concentra Urgent Care Group can provide antiretroviral medications for injuries potentially involving exposure to bloodborne pathogens. The evaluation shall include:

- 1. Documentation of the route(s) of exposure and the circumstances under which the incident occurred.
- 2. Determination whether an exposure incident occurred.
- 3. Identification and documentation of the source individual; and
- 4. Offer of HBV vaccination series to unvaccinated persons within 24 hours of the exposure.

Document any declination of the HBV vaccine series on the attached form. Baseline blood testing may be requested by the medical provider. The exposed worker's consent is required for HIV testing. The treating physician must be provided with:

- 1. A copy of 8 CCR 5193;
- 2. Copies of any other required Chapman University policy, procedure, protocol;

- 3. A description of the exposed worker's duties;
- 4. A copy of the Supervisors Report of Accident; and
- All medical records relevant to the appropriate treatment of the worker including vaccination status.

The treating physician must provide a written post exposure report to the University within 15 days of completion of the exposure evaluation. The report should contain an opinion whether hepatitis B vaccination is indicated for the worker and if the worker has begun the vaccination series. The report should document that the worker has been informed of the results of the full evaluation, and that the worker has been informed about medical conditions that require further evaluation or treatment. All other findings or diagnoses shall remain confidential and shall not be included in the written post-exposure evaluation report. The physician's report should be completed using the attached form and submitted to the Chapman University EH&S department with a completed copy of the sharps injury log for the incident.

## **Reporting and Documenting Sharps Incidences**

All sharps or non-sharps related injuries shall be reported immediately by completing a Chapman Incident/Accident Investigation Report Form (within 14 days of the injury). The reports are maintained for five years by EH&S. The reports will be reviewed by the Manager, EH&S to identify trends and take corrective action. Confidentiality of data will be maintained. The Chapman University Bloodborne Pathogen Committee will review reports of incidents annually or upon evidence of 2 or more injuries from the same identified device to evaluate the safety record of devices involved in causing injuries.

Incident/Accident Investigation Report Form.

https://www.chapman.edu/faculty-staff/risk-management/reporting.aspx.

Medical records will be:

- Stored by the Student Health Center or other appropriate secured location in confidential files:
- Available, during normal work hours, to the worker to whom the record pertains, to representatives of CAL/OSHA and to the worker's representative (with written consent from the subject worker); and
- 3. Maintained for the duration of the employment plus 30 years.

#### HEPATITIS B VACCINE

All Workers shall be advised of the importance of the Hepatitis B vaccination after the worker has received the training in bloodborne pathogen occupational exposure and within 10 working days of initial assignment. For employees of the University the hepatitis vaccine will be provided at no cost to the employee. For non-employee workers, this will be at their cost.

The Hepatitis B Vaccine is indicated for all workers whose work responsibilities present any exposure to hepatitis. If a routine booster dose of Hepatitis B vaccine is recommended by U.S. Public Health Service at a future date, such booster doses shall be secured. For employees of the University this will be provided at no cost to the employee. For non-employee workers, this will be at their cost.

If the employee initially declines Hepatitis B vaccination, but at a later date decides to accept the vaccination, the vaccination shall then be made available.

All employees who decline the Hepatitis B vaccination offered shall sign the OSHA-required waiver indicating their refusal.

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

All exposure incidents shall be reported, investigated, and documented. When a person incurs an exposure incident, it shall be reported immediately to their supervisor.

Following a report of an exposure incident, any exposed employee shall also report the incident to Human Resources for filing under the University Workers' Compensation program. Workers should seek appropriate medical attention for a confidential medical evaluation and follow-up, including at least the following elements

- 1. Documentation of the route(s) of exposure.
- 2. A description of the circumstances under which the exposure occurred.
- 3. The identification and documentation of the source individual. (The identification is not required if the person can establish that identification is impossible or prohibited by state or local law.)
- 4. The collection and testing of the source individual's blood for HBV and HIV serological status.
- 5. Post-exposure treatment (and follow-up) for the employee, when medically indicated in accordance according to current with the U.S. Public Health Service Policy.
- 6. Counseling will be provided to you at the time of any potential exposure, if you receive any positive test results, or as otherwise requested.
- 7. Evaluation of any reported illness.

The Healthcare professional evaluating individuals who are covered under this program will be provided with the following information, to the extent available, and necessary to the care of the individual:

- 1. A copy of this plan.
- 2. A copy of the Cal OSHA Bloodborne Pathogen regulations
- 3. Documentation of the route(s) of exposure.
- 4. A description of the circumstances under which the exposure occurred.
- 5. Results of the source individual's blood testing, if available.
- 6. All medical records applicable to treatment of the worker, including vaccination status.

The worker will receive a copy of the evaluating healthcare professional's written opinion within 15 days of the completion of the evaluation.

The healthcare professional's written opinion for Hepatitis B vaccination is limited to the following: (1) whether the worker needs Hepatitis B vaccination; (2) whether the worker has received such a vaccination. The healthcare professional's written opinion for post-exposure evaluation and follow-up is limited to the following information:

- 1. That the worker was informed of the results of the evaluation.
- 2. That the worker was informed about any medical conditions resulting from exposure to blood or other infectious materials that require further evaluation or treatment.

All other findings or diagnoses will remain confidential and will not be in a written report.

All medical evaluations shall be made by or under the supervision of a licensed physician or by or under the supervision of another licensed healthcare professional. All laboratory tests must be conducted by an accredited laboratory at no cost to the employee. All medical records will be kept in accordance with Cal OSHA Bloodborne Pathogens Standard 8 CCR 5193.

#### TRAINING AND RECORD KEEPING

All workers identified in "exposure determination" job categories described in this Plan shall participate in a training program. Each department head will ensure that the occupationally exposed workers under(their supervision receive training prior to performing an initial assignment and at least annually thereafter. Additional training will be provided when changes such as modification of tasks or procedures affect the workers' occupational exposure.

Most safety training records are recorded and stored in LearnUpon. If there is a change in tasks or procedures that affects the worker's occupational exposure, additional training will be provided by the Supervisor who will also maintain training records.

Basic Bloodborne Pathogen training will include the following:

- 1. An accessible copy of the regulatory text of Cal OSHA Bloodborne Pathogens Standard 8 CCR 5193 and an explanation of its contents;
- 2. An explanation of the Chapman University Bloodborne Pathogen Exposure Control Plan and the means by which the worker can obtain a copy of the written plan and an opportunity to present questions;
- 3. A general explanation of the epidemiology and symptoms of Bloodborne diseases;
- 4. An explanation of the modes of transmission of Bloodborne pathogens;
- 5. An explanation of the appropriate methods for recognizing tasks which may involve exposure to potentially infectious materials;
- An explanation of the use and limitations of exposure control including appropriate engineering controls, work practices and personal protective equipment (PPE);
- 7. An explanation of the basis for selection of personal protective equipment (PPE);
- 8. Information on the types, proper use, location, removal, handling, decontamination, and disposal of personal protective equipment.
- Information on the efficacy, safety, method of administration and benefits of the hepatitis B vaccine;
- Information on the actions to take in the event of an emergency involving blood or other potentially infectious materials;
- 11. An explanation of the procedure to follow if an exposure incident occurs;
- 12. Information on the post-exposure evaluation and follow-up;
- 13. An explanation of the signs, labels and color coding used by the University to identify biohazardous areas and materials; and
- Additional department-specific information will be provided for, including the location of and availability of needed PPE, cleaning materials, disposal containers, labels, etc.

## PROGRAM REVIEW

Environmental Health and Safety staff will coordinate annual review of the Bloodborne Pathogen exposure control plan to evaluate the program's effectiveness and regulatory compliance. The Chapman University Bloodborne Pathogen Control Committee and other affected parties will participate in the program review. The Exposure Control Plan will be revised as necessary to include new or modified tasks.

## **Incident/Accident Investigation Report**

https://web.chapman.edu/incidentreporting/IncidentForm.aspx

- 1. Date and Time of Incident
- 2. Department Making this Report
- 3. Person Making this Report

Name:

Title:

Phone number:

**Email Address:** 

4. Type of Incident

Auto Accident

Concussion

**Property Damage** 

Personal Injury

Theft

Other

- 5. Details of Incident/Accident (Who, What, Where, When, Why, How)
- 6. Where there any witnesses and/or other persons involved in the Incident?
- 7. Identify any injured persons. Check all that apply.

Employee

Student

Visitor

Other

- 8. Was there any exposure to blood or other potentially infectious materials (OPIM)? If yes describe.
- 9. Did this incident involve a Sharps injury?

If yes, describe.

10. Was First Aid or Other Medical Care Rendered?

If yes, describe.

11. Was an AED Activated for Use?

If yes, describe.

12. Was there any damage to University property?

If yes, describe.

13. Was there any damage to the property of others?

If yes, describe.

- 14. Did any Chapman University Internal Departments and/or Persons respond? If yes, describe.
- 15. Did any external public safety (police/fire) agencies respond? If yes, describe.
- 16. Are affected areas/equipment currently out-of-service? If yes, describe.
- 17. Could this incident/accident have been prevented? If yes, describe.
- 18. Was there any Unsafe Condition Not Described Above? If yes, describe.
- 19. Are there any Unsafe Conditions that need to be addressed? If yes, describe.
- 20. Do you know of Other Areas at Chapman where other similar incidents might occur? If yes, describe.
- 21. Other Comments?

File Upload

# **Hepatitis B Vaccine Declination**

I understand that due to my occupational exposure to blood or other infectious materials that I may be at risk of acquiring Hepatitis B virus infection. I have been given the opportunity to be vaccinated with the Hepatitis B vaccine at no charge to myself. However, I decline the 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 the Hepatitis B vaccine, I can receive the vaccine series at no charge to me.

(name of exposed individual)	(status or position)
(date)	(signature)
(department name)	