

CHAPTER SEVENTEEN – BLOODBORNE PATHOGENS – EXPOSURE AND CONTROL

New Mexico Regulation on Bloodborne Pathogens

Occupational Safety and Health Standards (OSHA) [Regulation 29 CFR 1910.1030](#) requires that employers who have employees with potential occupational exposure develop a written Bloodborne Pathogen Exposure Control Plan. The Bloodborne Pathogen Exposure Plan is designed to eliminate or minimize employee exposure.

According to OSHA occupational exposure is defined as “reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee’s duties.” ([Regulation 29 CFR 1910.1030](#)). OSHA has determined that some employees face a significant health risk as the result of occupational exposure. Blood and other potentially infectious materials are a significant risk because they may contain bloodborne pathogens, including hepatitis B virus (HBV) and human immunodeficiency virus (HIV). The agency further concludes that this exposure can be minimized or eliminated using a combination of engineering and work practice controls, personal protective clothing and equipment, training, medical surveillance, hepatitis B vaccination, signs and labels and other provisions.

Under New Mexico Law, [Standard number: 1952.20a](#) the state standards for occupational exposure to bloodborne pathogens and enforcement requirements meets or exceeds federal standards by being at least as effective as federal requirements.

Guidelines

- Each school district must perform an employee exposure determination to identify employees who may incur occupational exposure to blood or other potentially infectious materials. This identification must result in a list of job classifications that may be expected to incur such occupational exposure, regardless of frequency.
- As part of the federal standard, the employer is required to make available, at no cost to the employee, the hepatitis B series of vaccinations if employee is determined to be at risk for potential exposure. Furthermore, the employer must provide all appropriate personal protective equipment (PPE).
- Suggested PPE in the school setting includes gloves, face shield, apron/gown and goggles. A mouth-to-mouth shield should also be available for use by those staff properly trained and certified in its use, i.e. emergency response/CPR/first aid trained employees.
- School districts should designate administrative staff to investigate claims relating to exposures to blood and other body fluids.
- For all bloodborne pathogen exposure incidents, A [Notice of Accident](#) and an [E10-1](#) should be filed with the State Department of Education’s Worker’s Compensation Claims Adjuster who will determine if the claim is compensable under the Worker’s Compensation Law.

- Staff must be trained within 90 days of hire, then annually thereafter, be familiar with this policy and abide by its requirements.

Needlestick Safety and Prevention Act

- The Centers for Disease Control and Prevention estimate that healthcare workers in the US sustain nearly 600,000 percutaneous injuries annually involving contaminated sharps.
- An estimated 16,000 of these injuries involve sharps contaminated with blood or OPIM (Other Potentially Infectious Material) containing HIV.
- It is thought that use of safer devices could prevent about 80% of these injuries. In response to both the continuous concern over these exposures and the technological developments that may increase employee protection,
- Congress passed the [Needlestick Safety and Prevention Act of 2000](#).

Under this law, employers must:

- Document consideration and use of appropriate, commercially available and effective safer devices.
- Solicit input from non-managerial employees responsible for direct patient care regarding the identification, evaluation and selection of effective engineering controls.
- Document, in the exposure control plan, how this input was received.
- Maintain a detailed sharps injury log.

Employees are expected to:

- Not interfere with the safety features of any device.
- Report all unintentional sticks immediately, even needle sticks with a clean needle.
- Participate in the evaluation of effective engineering controls as these are introduced into their area. Share ideas and opinions concerning safer devices by communicating in writing with the appropriate safety officer, giving specific details of the device and any problems or advantages regarding the use of the device.

All reported needle sticks are confidential.

Hepatitis B Vaccination and Post-Exposure Follow-Up General Policy

-Employers will make available hepatitis B vaccination free of charge to designated high risk groups following the required training and will offer post exposure follow-up for all employees with an occupational exposure incident.

-All medical evaluations and procedures will be performed under the supervision of a licensed healthcare provider, and an accredited laboratory for all laboratory tests. All evaluations, procedures, vaccinations, and post-exposure management will be provided within a reasonable time (ASAP) and according to standard recommendations for medical care.

HBV Vaccination

-For Hepatitis B vaccination and bloodborne pathogen exposure follow-up the school district will follow procedures recommended by the New Mexico Public Schools Insurance Authority.

-Identified high risk employees will be offered the HBV series of vaccinations as a precautionary measure at the expense of the school district.

-The school district coordinator of risk management or designee will investigate claims relating to bloodborne pathogen exposure and coordinate the follow-up process.

Record Keeping

The employer shall establish and maintain an accurate record regarding bloodborne pathogen risk potential and actual exposure for each employee that will include a minimum of the following.

Exposure risk classification

-Offer of HBV vaccination as well as acceptance/declination of vaccine

-Documentation of bloodborne pathogens exposure training

-Follow-up process/procedure for any occupational exposure incidents.

Communication of Hazards to Employees

Labels and Signs

-Warning labels should be affixed to containers of regulated waste containing blood or other potentially infectious material and other containers used to store, transport or ship blood or other potentially infectious materials.

-Labels should include the BIOHAZARD symbol and be fluorescent orange or orange red with lettering or symbols in a contrasting color.

-Labels should be attached to the biohazard container by string, wire, adhesive or other method to prevent loss or unintentional removal. Red biohazard bags or containers may be substituted for labels, and they should be stored in a regulated area for pickup and disposal.



Employee Information and Training

All employees in this school district will participate annually in a bloodborne pathogen exposure training. Additional training may occur when changes such as modification of tasks or procedures may affect an employee's occupational exposure classification.

Employee Bloodborne Pathogen Exposure Training will include a minimum of the following topics.

- Universal Precautions
- Location of a copy of OSHA's Bloodborne Pathogen Standard 1910.1030
- Explanation of epidemiology, symptoms and transmission modes of bloodborne diseases.
- Explanation of this exposure control plan and location where it can be accessed
- Methods employees should use to recognize tasks involving potential occupational exposure
- Methods of operation that can prevent or reduce occupational exposure
- Selection, limitations, location, decontamination and proper disposal of PPE
- HBV Vaccine
- Response mechanism/procedures regarding exposure to potentially infectious materials
- Post exposure follow-up responsibilities for exposure
- Explanation of labels and/or biohazard color-coding system
- Opportunity for employee to ask follow-up questions and obtain answers during training
- Training records that will be maintained in the employee's personnel file

Exposure Classifications

All school district employees in the following job classifications have been identified as having occupational exposure risk to bloodborne pathogens.

- Daily Risk of Exposure
- Nurses/Health Assistants
- Security Officers
- Coaches/Athletic Director
- Special Education Teachers/Assistants
- Physical Education Teachers/Assistants
- Custodians

Occasional Risk of Exposure

- Administrators
- Classroom Teachers
- Secretaries
- Educational Assistants
- Food Service Workers
- Maintenance Workers
- Bus Drivers
- School Bus Aides

Students:

- who work with children in nursery
- who work as lab assistants
- who work in coop programs

Sample Bloodborne Pathogens Exposure Control Plan

Purpose and Policy

The purpose of the exposure control plan for this school district is to implement the requirements of the OSHA Standard [Regulation 29 CFR 1910.1030](#) Bloodborne Pathogens. The control Plan is in place to reduce the risk of employee infection with bloodborne pathogens such as, but not limited to Hepatitis B Virus (HBV), Hepatitis C (HCV) and the Human Immunodeficiency Virus (HIV) which can result in the disease commonly known as Auto Immune Deficiency Syndrome (AIDS).

The policy of this school district is that employees shall adhere to Universal Precautions. Universal Precautions is an approach to infection control. According to this concept, all human blood and human body fluids are treated as if known to be infectious for HIV, HBV and other bloodborne pathogens. The exposure control plan offers guidelines for employees to prevent exposure and for follow-up action should exposure occur.

A copy of this plan shall be maintained in each principal's office. The school health office should have a copy of the Bloodborne Pathogen Exposure Control Plan. Also, most school districts risk management department will have a copy of the control plan.

Definitions

Biological Waste - Biological waste consists of blood, excretions, exudations, secretions, suctioning's, and disposable medical supplies, which have come in contact with these substances, including but not limited to:

Medical waste – catheters, bandages, and any disposable items used in the treatment of students or employees.

Laboratory waste – cultures, specimens, slides, blood and tissue samples.

Potentially hazardous non-biological waste or trash – includes garbage waste from the preparation, cooking and serving of food in any area where biological waste may contaminate otherwise non-biological garbage or trash. Also, included in this category is combustible (e.g., plastic, wood, or paper) and non-combustible (e.g., metal or glass) materials discarded from or in an area contaminated by contact with biological waste.

Blood – Blood means human blood, human blood components and products made from human blood.

Bloodborne Pathogens – Pathogenic microorganisms that are present in human blood that can infect and cause disease in persons who are exposed to blood containing these pathogens.

Contaminated - The presence or reasonably anticipated presence of blood or other potentially infectious material on an item or surface.

Decontamination - The use of physical or chemical means to remove, inactivate, or destroy bloodborne pathogens on a surface or item to the point where they are no longer capable of transmitting infectious particles, and the surface of the item is rendered safe for handling, use, or disposal.

Engineering Controls - Controls that isolate, minimize, or remove a workplace hazard.

Exposure Incident - A specific eye, mouth, or other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious material that result from the performance of an employee's duties.

Handwashing Facilities – Access to an adequate supply of running water, soap and single-use towels.

Occupational Exposure - Reasonably anticipated skin, eye, mucous membrane or parenteral contact with blood or other potentially infectious materials that results from the performance of an employee's work duties.

Parenteral Exposure - The piercing of the skin barrier, including mucous membranes, by such events as needle sticks, human bites, cuts and abrasions.

Personal Protective Equipment - Specialized clothing or equipment worn by an individual to protect from a hazard. It does not permit blood or other potentially infectious materials to pass through it or reach the employee/s work clothes, street clothes, under garments, skin, eyes, mouth or other mucous membranes under normal conditions of use and for the duration of time during which the protective equipment will be used.

Regulated Waste - Any one of the following:

liquid or semi-liquid blood or other potentially infectious materials;
contaminated items that could release blood or other potentially infectious materials in a liquid or semi-liquid state if compressed;
items that are caked with dried blood or other potentially infectious materials and can release these materials during handling;
contaminated sharps;
pathological and microbiological wastes containing blood or other potentially infectious materials.

Universal Precautions - A method of infection control in which all human blood and certain body fluids are treated as if known to be infectious for HIV, HBV, HCV and other bloodborne pathogens.

Work Practice Controls - Controls that reduce the likelihood of exposure by altering the way a task is performed.

For definitions of other terms used in this Bloodborne Pathogens Exposure Control Plan, see [Regulation 29 CFR 1910.1030](#) Definitions.

Exposure Determination

The lists of job classifications, in the school district, for which employees have been identified as having occupational exposure risk. Exposure determination for these jobs has been made without regard to the use of personal protective equipment (PPE).

This job classification list was determined according to the potential exposure and subsequent transmission risk of certain bloodborne pathogens that employees might come in contact with during their work. These pathogens, which can transmit certain diseases, may be present in blood and other body fluids such as saliva, semen, and vaginal secretions as well as other secretions.

Bloodborne pathogens can enter and infect the human body through openings in the skin including cuts, nicks, abrasions, dermatitis, or acne. Infection can also result from punctures or cuts caused by sharp contaminated objects such as needles, broken glass, exposed ends of dental wires or any other contaminated object that can puncture or cut skin. Infection can also gain access to the body through mucous membranes of the eyes, nose, and mouth when these areas are touched with contaminated hands or implements. The HBV is particularly dangerous since it can survive on dried surfaces at room temperature for at least one (1) week (7days) ([Hepatitis B FAQs](#)).

Methods of Compliance

-Universal precautions shall be observed to minimize contact with blood or other potentially infectious materials.

-When differentiation between body fluid types is difficult or impossible, all body fluids shall be considered potentially infectious materials.

Engineering and Work Practice Controls

Gloves: Employees should wear protective gloves appropriate for risk status.

Handwashing: Employees should wash hands immediately or as soon as possible after removal of gloves or other PPE and after contact with blood or other potentially infectious materials. If hand washing facilities are not immediately available, employees should use antiseptic hand cleaner or towelettes, and then wash hands with soap and water as soon as feasible.

Procedures: All procedures involving blood or other infectious materials should be performed in such a manner as to minimize splashing, spraying, splattering and generation of droplets.

Hazardous Materials: Any container for storage, transport or shipping of potentially infectious material should be sealed and labeled or color coded.

If outside contamination of the primary container occurs, it should be placed within a second container which prevents leakage during handling/processing, storage, transport or shipping. The second container should be labeled with a biohazard sign. If the specimen could puncture the primary container, it should be placed in a puncture resistant second container meeting the characteristics as just stated.

Equipment: Equipment which may become contaminated with blood or other potentially infectious material should be decontaminated unless decontamination is not feasible.

Contaminated equipment should be enclosed in a red biohazard bag or have attached a biohazard label stating which portions remain contaminated.

It is the responsibility of the school district Safety Officer or his/her designated charge person (whoever handles the contaminated equipment) to notify all employees potentially handling the equipment, the servicing representative and/or manufacturer prior to releasing the contaminated equipment for shipping and/or decontamination.

Personal Protective Equipment (PPE)

Gloves: Gloves should be worn when it can reasonably be anticipated the hands might have contact with blood, mucous membranes, non-intact skin, other potentially infectious materials and when touching or handling contaminated items or surfaces.

Disposable (single use) gloves should be replaced as soon as possible when contaminated, torn, punctured, or when their ability/function as a barrier is compromised. Disposable gloves should not be washed or disinfected for re-use. Gloves should be worn when performing any vascular access procedures, including heel sticks and finger sticks.

Utility gloves may be decontaminated for re-use if the integrity of the glove is not compromised; However, they should be discarded if they are cracked, peeling, torn, punctured, or exhibits other signs of deterioration or when their ability to function as a barrier is compromised.

Face protection: Face protection should be worn whenever splashes, spray, spatter, droplets or aerosols of blood or other potentially bloodborne infectious materials may be present and eye, nose or mouth contamination can be anticipated.

Protective clothing: Appropriate protective clothing should be worn in occupational exposure situations. The type and characteristics of the clothing will depend upon the task and degree of exposure anticipated. This includes closed toe shoes.

Housekeeping

Cleaning and Disinfection: All equipment and environmental working surfaces should be properly cleaned and decontaminated after contact with blood or other potentially infectious materials.

Refuse containers: All bins, cans and similar receptacles intended for reuse which have a reasonable likelihood for becoming contaminated with blood or other potentially infectious materials shall be inspected and decontaminated on a regular basis and cleaned and decontaminated immediately or as soon as possible upon visible contamination.

Regulated Waste

Regulated waste should be placed in labeled containers which can be sealed and are constructed to hold the contents and prevent leakage of fluids during handling, storage, transport or shipping. If outside contamination of the regulated waste container occurs, it should be placed in a second container meeting the same requirements as the original container.

Regulated waste should be disposed of in accordance with New Mexico Environmental Department Hazardous Waste. School Districts must contract with an approved hazardous waste disposal company.



Handling Sharps

Used needles: Used needles should not be cut, bent, broken or reinserted into original sheath. They should be discarded intact immediately after use into an OSHA approved sharps disposal container.

OSHA approved sharps disposal containers: OSHA-approved containers for sharps should be easily accessible in areas where employees routinely have the greatest potential exposure for contamination by sharps.

These containers should be sealed and replaced when they are 75% full to decrease exposure by forcing contaminated objects into the container.



References and Resources

Centers for Disease Control and Prevention, (May 23, 2016). [Division of Viral Hepatitis and National Center for HIV/AIDS, Viral Hepatitis, STD, and TB Prevention, Hepatitis B](#)

[FAQs](#)

[Confidential Exposure Incident Report Template](#)

[Employee Acceptance/Declination Template](#)

[Exposed to HIV](#)

[Information for Personnel Exposed to HCV](#)

State of New Mexico Worker's Compensation Administration, [Notice of Accident](#)

State of New Mexico Worker's Compensation Administration, [E10-1](#)

[Training Record Template](#)

United States Department of Labor, Occupational Safety and Health Administration (OSHA)

[Needlestick Safety and Prevention Act of 2000](#)

United States Department of Labor, Occupational Safety and Health Administration (OSHA)

[Regulation 29 CFR 1910.1030](#)