I. PURPOSE **1**
II. SCOPE **1**
III. DEFINITIONS **2**
IV. RISK ASSESSMENT BY JOB DUTY **2**
A. Maintenance Employees 2
B. Laboratory Employees 2
C. Clinical Employees (Nurses, EMTs, Healthcare Providers) 3
D. Custodial Workers 3
E. First Aid Responders 4
V. TRAINING **4**
VI. EXPOSURE CONTROL PLAN **4**
VII. HOUSEKEEPING AND WASTE DISPOSAL **5**
VIII. RECORDKEEPING **5**
IX. REVIEW AND EVALUATION **5**

I. PURPOSE

The purpose of this plan is to minimize the risk of exposure to bloodborne pathogens ("BBP") for all employees of the College as required by the Occupational Safety and Health Administration ("OSHA") Standard 29 CFR §1910.1030, "Bloodborne Pathogens." This plan applies to all employees who may be at risk for exposure to blood and other potentially infectious materials ("OPIM").

II. SCOPE

This BBP Exposure Control Plan applies to all employees who have job duties that could result in occupational exposure to bloodborne pathogens. This includes, but is not limited to:

- Maintenance Staff,
- Laboratory Employees,
- Clinical Staff,
- Custodial Workers, and
- First Aid Responders.

This BBP Exposure Control Plan also applies to non-employee individuals who are either 1) performing services for the College or 2) acting in fulfillment of their educational requirements, and whose duties could result in occupational exposure to bloodborne pathogens. This includes, but is not limited to:

- Volunteers,
- Health Services Clinical Internship Students, and
- Students in labs with risk of bloodborne pathogen exposure.

For the purposes of this BBP Exposure Control Plan, a non-employee individual is subject to the same BBP risk assessment as employees whose duties most closely resemble the duties of the non-employee individual. Health Services Clinical Internship Students are provided BBP training in connection with their course of study prior to assignment to a clinical placement that could result in potential exposure, with such documentation retained by the student's applicable educational program rather than the Center for Organizational Excellence or the Department of Human Resources.

III. DEFINITIONS

- **Bloodborne Pathogens**: Infectious microorganisms in human blood that can cause disease in humans. These include, but are not limited to, hepatitis B virus ("HBV"), hepatitis C virus ("HCV"), and human immunodeficiency virus ("HIV").
- **Occupational Exposure**: Reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or OPIM during the performance of an employee's duties.
- **Other Potentially Infectious Materials**: Includes bodily fluids, tissues, or organs that may be contaminated with bloodborne pathogens.

IV. RISK ASSESSMENT BY JOB DUTY

A. Maintenance Employees

- **Potential Exposure**: Maintenance workers are at risk for BBP exposure if they handle broken glass, clean up blood spills, or maintain equipment in areas where blood or bodily fluids may be present.
- **Exposure Control Measures**:
    - Provide proper personal protective equipment ("PPE"), including gloves, safety glasses, and face shields.
    - Provide training on handling blood spills and safely cleaning areas contaminated with blood or OPIM.
    - Ensure employees are trained in the use of biohazard waste disposal procedures and blood spill kits.
    - Establish proper sanitation procedures for maintenance tools.

B. Laboratory Employees

- **Potential Exposure**: Lab employees, particularly those working in biology, chemistry, or clinical labs, may be exposed to bloodborne pathogens through accidental needle sticks, blood or body fluid splashes, or contaminated surfaces.
- **Exposure Control Measures**:
    - Ensure all lab staff receive specific BBP training, focusing on the safe handling of blood, biological samples, and sharp objects (needles, scalpels, etc.).
    - Use of engineering controls such as biosafety cabinets, sharps disposal containers, and autoclaves for decontamination.
    - Employees must wear appropriate PPE, including lab coats, gloves, goggles, and face shields.
    - Employees must receive vaccination for HBV, if appropriate.
    - Strict adherence to universal precautions in handling and disposing of biological samples and waste.

C. Clinical Employees (Nurses, EMTs, Healthcare Providers)

- **Potential Exposure**: Clinical staff who provide direct patient care are at the highest risk for BBP exposure due to contact with blood, body fluids, and contaminated sharps.
- **Exposure Control Measures**:
    - Vaccinations, pathogen or immunity tests, or waivers as required by clinical site partners.
    - Clinical staff must wear appropriate PPE including gloves, gowns, face shields, and masks, including fit testing for N95 masks if required by the site.
    - Engineering controls such as needleless systems and sharps disposal containers must be used.
    - Maintain standard precautions for all patient interactions, including the proper disposal of needles, syringes, and other sharps.
    - Post-exposure follow-up and access to medical care in the event of an exposure incident.

D. Custodial Workers

- **Potential Exposure**: Custodians may come into contact with blood or OPIM when cleaning areas where accidents have occurred, such as classrooms, dormitories, restrooms, and athletic facilities.
- **Exposure Control Measures**:
    - Provide training on bloodborne pathogens, with a focus on cleaning up blood spills and waste disposal.
    - PPE must be provided and worn, including gloves, face shields, and aprons when cleaning contaminated surfaces.
    - Use of appropriate disinfectants for cleaning potentially contaminated areas.
    - Custodians must be provided with blood spill kits, including absorbent materials, disinfectants, and disposal bags.

E. First Aid Responders

- **Potential Exposure**: Employees trained to provide first aid, such as security personnel, may come into contact with blood or other body fluids while responding to emergencies on campus.
- **Exposure Control Measure**s:
    - Provide first aid kits with appropriate PPE such as gloves, face shields, and resuscitation masks.
    - All first aid responders should receive BBP training and HBV vaccination.
    - Ensure that first aid responders are trained in proper post-exposure procedures, including reporting an incident and receiving medical evaluation if exposure occurs.

V. TRAINING

- All employees in roles where BBP exposure may occur (Maintenance, Lab, Clinical, Custodial, First Aid Responders) must receive training on the following:
    - The risks associated with bloodborne pathogens.
    - Recognition and avoidance of potential exposure.
    - Use of PPE.
    - Safe work practices and engineering controls.
    - Procedures for reporting exposure incidents.
    - Proper handling, cleaning, and disposal of contaminated materials.
- **Training Frequency**: BBP training will be provided in the first thirty (30) days for new hires, and refresher courses will be conducted at least annually.
- **Documentation**: Records of training will be maintained, including dates, attendees, and materials presented, by the Department of Human Resources.

VI. EXPOSURE CONTROL PLAN

- **Engineering and Work Practice Controls**: The College will implement engineering controls (e.g., sharps containers, biohazard waste bins) and work practices to minimize exposure to bloodborne pathogens.
- **Personal Protective Equipment**:
    - PPE, including gloves, goggles, face shields, gowns, and masks, will be provided to all employees based on their specific duties.
    - PPE must be worn whenever employees are working with or near potential bloodborne pathogens.
- **Hepatitis B Vaccination**: All employees at risk of BBP exposure will be offered the HBV vaccination at no cost.
- **Post-Exposure Protocols**:
    - In case of exposure, employees must immediately wash the affected area with soap and water, report the exposure to their supervisor, and seek medical evaluation.
    - Post-exposure prophylaxis (“PEP”) for HIV and HBV will be provided as necessary.

- An exposure incident report will be completed, and the employee will be offered medical counseling and follow-up care.
- Exposure incidents shall be evaluated and processed as appropriate in connection with the College's Workers' Compensation and other insurance policies.

VII. HOUSEKEEPING AND WASTE DISPOSAL

- **Waste Disposal**: All waste contaminated with blood or OPIM will be disposed of in red biohazard bags or containers, which will be collected and disposed of according to state and federal regulations.
- **Cleaning and Decontamination**: All equipment, surfaces, and areas where exposure may have occurred will be decontaminated using appropriate disinfectants. Blood spill kits will be available in high-risk areas.

VIII. RECORDKEEPING

- **Training Records**: Records of training will be maintained for a minimum of three (3) years by the Center for Organizational Excellence.
- **Medical Records**: Medical records related to BBP exposure (e.g., vaccinations, post-exposure follow-up) will be maintained for the duration of employment plus thirty (30) years by the Department of Human Resources.

IX. REVIEW AND EVALUATION

The BBP Exposure Control Plan will be reviewed annually to ensure it remains effective and compliant with current regulations. Updates will be made if there are changes in the work environment, tasks, or applicable laws.

REFERENCES

Statutory References	None
Regulatory References	29 CFR 1910.1030
Relevant Guidance	None
Policy Manual Cross-References	None

PROCEDURE HISTORY

March 1, 2025	Adopted.
February 17, 2026	Renumbered to Procedure 2.1.10.1 from Procedure 2.1.10.1 / 3.4.5.1 due to streamlining of duplicate policies.