

**Limestone College
Athletic Training Program
Bloodborne Pathogen Exposure Control Plan**

POLICY

Limestone College Athletic Training Program is committed to providing a safe and healthful work environment for our students. 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."

Students enrolled in the Athletic Training Program are not employed by Limestone College; however, through their educational experiences, they may come into contact with blood or other potentially infectious materials (OPIM). Annual Bloodborne Pathogen Training is required of all prospective and current students. Initial training occurs via AT 188 and retraining occurs each fall before the student is permitted to begin clinical hours. Personal protective equipment and regulated biohazard waste disposal is provided in all athletic training facilities and athletic training supervised events. In the event of accidental bodily exposure to blood or OPIM, the student is to follow cleansing procedures outlined in the Bloodborne Pathogen Training and report the incident immediately to their assigned Clinical Preceptor to ensure proper procedure and documentation.

The ECP is a key document to assist our program in implementing and ensuring compliance with the standard, thereby protecting our students.

This ECP includes:

- Determination of student exposure
- Implementation of various methods of exposure control including: universal precautions, engineering and work practice controls, personal protective equipment, and housekeeping
- Hepatitis B vaccination
- Post-exposure evaluation and follow-up
- Communication of hazards to students 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

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

Those students 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 Athletic Training Program Faculty and the Athletic Training Department will maintain and provide all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard. The Athletic Training Program Faculty will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.

The Director of the Athletic Training Program will be responsible for ensuring that all medical actions required are performed and that appropriate student health and OSHA records are maintained.

The Program Director and/or Clinical Education Coordinator will be responsible for the administration of training, documentation of training, and making the written ECP available to student, OSHA, and NIOSH representatives.

STUDENT EXPOSURE DETERMINATION

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

JOB TITLE	LOCATION	DUTIES
Athletic Training Students	Athletic Training Facilities Practice/Competition Venues	Wound Care Evaluation Treatment Cleaning Laundry

METHODS OF IMPLEMENTATION AND CONTROL

Universal Precautions

All students will utilize universal precautions. Universal precautions is an approach to infection control to treat all human blood and certain human body fluids as if they were known to be infectious for HIV, HBV and other bloodborne pathogens.

Exposure Control Plan

Students covered by the bloodborne pathogens standard receive an explanation of this ECP during their initial training session in AT 180. It will also be reviewed in their annual refresher training that occurs each fall semester before the student is permitted to begin clinical hours. All students have an opportunity to review this plan at any time during their clinical hours by contacting the Director of the Athletic Training Program.

The Director of the Athletic Training Program is responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect any new or modified tasks and procedures which affect occupational exposure and to reflect new or revised student positions with occupational exposure.

Engineering Controls

Engineering Controls and Work Practices Controls are practices and items designed to keep isolate or keep blood and OPIM away from the students. All engineering controls must be utilized and maintained at all times. Engineering controls and work practice controls will be used to prevent or minimize exposure to bloodborne pathogens. The specific engineering controls and work practice controls used are listed below:

- Hand washing facilities are readily available throughout the campus and will be used immediately by all students exposed to blood or OPIM as soon as feasible after removal of gloves or other protective equipment. As an alternative, antiseptic hand sanitizer will be available at all times for contests, practices, or conditioning sessions at fields and contest sites where running water is not available.
- All sharp objects contaminated with blood or OPIM must be discarded in a Sharps Container that is leak proof, puncture resistant, properly labeled, kept upright throughout use, replaced routinely, kept closed when moved, and not allowed to overfill. Sharps Containers are stored in the Athletic Training Rooms located in the Walt Griffin Physical Education Center, Limestone Center, and Timken Gymnasium. Reusable contaminated sharps disposal containers should never be manually opened, emptied, or cleaned.
- Biohazard containers/bags are available in the Athletic Training Rooms for materials that have become contaminated with blood or OPIM. Grossly soaked items are to be discarded in double biohazard bags.

Sharps disposal containers are inspected and maintained or replaced by the Environmental Health and Safety Compliance Officer whenever necessary to prevent overfilling.

Work Practice Controls

Latex or hypo-allergenic gloves shall be worn for all tasks where there is a likelihood of exposure to blood or other OPIM.

After treatment, disposable and reusable equipment shall be placed in separate biohazard containers/bags kept on the sidelines/benches. The biohazard containers/bags will remain on the sidelines/benches until after the contest when they will be removed and stored for proper decontamination or disposal.

When hand washing facilities are not available, hands must be cleansed with an antiseptic hand sanitizer immediately after gloves are removed. Hands shall then be thoroughly washing with soap and water as soon as possible.

Other means to reduce the likelihood of exposure are to restrict eating and drinking in potentially contaminated areas, preventing the storage of food or beverages in refrigerators or other locations where blood or OPIM are kept, and be sure to remove personal protective equipment before leaving the contaminated areas.

The Athletic Training Program identifies the need for changes in engineering control and work practices through a review of OSHA records, Athletic Training Program Evaluation of the Clinical Preceptor, Athletic Training Program Evaluation of the Affiliate Clinical Site, Clinical Experience Evaluations, ATS Evaluations of the Clinical Preceptor, and Exit Interviews

The Environmental Health and Safety Compliance Officer is responsible for checking the controls once daily in the athletics training room and weekly in all other areas replacing them as needed. Every nine days the sharps containers and the biohazard trash bins will be emptied and stored in a biohazard freezer. After 30 days the biohazard material will be removed from the freezer by Advanced Environmental Option inc. to be properly disposed of. A Disinfectant/Cleaning Schedule will be maintained on a daily basis where it will be documented when the area was cleaned and what cleaner was used.

Personal Protective Equipment (PPE)

PPE is provided to our students at no cost to them. Training is provided by the Athletic Training Program Faculty in the use of the appropriate PPE for the tasks or procedures students will perform. The types of PPE available to students are as follows:

- Latex examination gloves in appropriate sizes
- Protective glasses
- Face masks
- Face shields
- CPR barriers
- Protective gowns
- Sharps containers
- Sani-cloth germicidal disposable cloths for field hand washing

PPE is located in the Athletic Training Rooms located at the Walt Griffin Physical Education Center, Limestone Center, and Timken Gymnasium, medical kits, and athletic training student messenger packs. PPE may be obtained through the Athletic Training Program and/or Athletic Training Department Staff.

All students using PPE must observe the following precautions:

- Wash hands with soap and water immediately or as soon as feasible after removal of the gloves or other PPE. Hand sanitizer is available.
- Remove PPE after it becomes contaminated, and before leaving the work area. Used PPE may be disposed of in biohazard trash containers or sharps containers
- 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.
- 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.

Regulated Waste Disposal

- Disposable protective equipment and other contaminated materials must be disposed of properly in biohazard labeled bags and must not be reused.
- Used biohazard bags are disposed in a biohazard collection container with a biohazard warning label. Biohazard collection container is stored in the Athletic Training Rooms in the Walt Griffin Physical Education Center, Limestone Center, and Timken Gymnasium
- A Sharps Container is located in the Athletic Training Rooms in the Walt Griffin Physical Education Center, Limestone Center, and Timken Gymnasium.
- The Environmental Health and Safety Compliance Officer is responsible for checking the controls once daily in the athletics training room and weekly in all other areas replacing them as needed. Every nine days the sharps containers and the biohazard trash bins will be emptied and stored in a biohazard freezer. After 30 days the biohazard material will be removed from the freezer by Advanced Environmental Option inc. to be properly disposed of. A Disinfectant/Cleaning Schedule will be maintained on a daily basis where it will be documented when the area was cleaned and what cleaner was used.

Housekeeping

The facility shall be cleaned daily and all potentially contaminated surfaces disinfected with an EPA-approved disinfectant following the latest Center for Disease Control (CDC) guidelines.

Areas to be cleaned:

- Treatment tables
- Counter surfaces
- Equipment surfaces
- Sinks

Disinfectants to be used:

- Bleach solution and other EPA approved disinfectants

A copy of relevant information about the disinfectant products used and, as necessary, material safety data sheets are included in the hazardous communication plan.

Spills shall be cleaned as follows:

- Minor spills will be cleaned wearing heavy duty gloves, using absorbent materials and disinfected. All waste should be disposed of the proper container.
- Large spills shall be cleaned by covering the contaminated area with the appropriate absorbent material. Dispose of absorbent and disinfect the area using the disinfectant provided. After disinfection, the area should be washed and rinsed with clean water. PPE, including heavy duty gloves, goggles, and liquid resistant lab coat shall be worn during this cleanup.
- A mechanical device shall be used for handling broken glass or other sharp objects.

Laundry

All potentially contaminated laundry shall be handled while wearing personal protective equipment. It should not be rinsed but containerized as near as possible to site of generation.

Special bags marked as biohazard or red in color are to be used for the transportation and collection of all contaminated clothing or linens. These will be given to the coaches in the event that an athletic trainer is not on site or unavailable to travel with the team and there is an issue with blood on a uniform. These bags will then be turned in to the athletic training room as soon as possible and the athletic training department will clean all soiled uniforms. Coaches need to make sure that there are spare uniforms on hand if there is an issue with blood on a uniform

Students should place contaminated laundry in the red biohazard bag and follow protocol for contaminated laundry in exposure control plan, see sample form.

HEPATITIS B VACCINATION

The Athletic Training Faculty will provide training to students on hepatitis B vaccinations, addressing the safety, benefits, efficacy, methods of administration, and availability.

The hepatitis B vaccination series is available after training and within 10 days of initial assignment to students identified in the exposure determination section of this plan. Vaccination is encouraged unless:

- documentation exists that the student has previously received the series,
- antibody testing reveals that the student is immune, or
- medical evaluation shows that vaccination is contraindicated.

However, if a student chooses to decline vaccination, the student must sign a declination form. Students who decline may request and obtain the vaccination at a later date. Documentation of refusal of the vaccination is kept in the ATS Portfolio. These records are maintained by the Athletic Training Faculty.

The vaccination is available in the Limestone College Health Center, Cherokee County Health Department, and/or at the office of the student's physician.

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

POST-EXPOSURE EVALUATION AND FOLLOW-UP

Should an exposure incident occur, the students should immediately inform the assigned Athletic Training Staff Member/Clinical Preceptor and contact the Director of the Athletic Training Program.

An immediately available confidential medical evaluation and follow-up will be conducted by the Athletic Training Staff Member/Clinical Preceptor, Director of the Athletic Training Program, and/or School Nurse. Following the initial first aid which involves cleaning the wound and/or flushing the eyes/other mucous membranes, the following activities will be performed:

- Document the routes of exposure and how the exposure occurred.
- Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).
- Obtain consent and make arrangements to have the source individual tested as soon as possible to determine HIV, HCV, and HBV infectivity; document that the source individual's test results were conveyed to the student'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 student 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 student's blood as soon as feasible after exposure incident, and test blood for HBV and HIV serological status
- If the student 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 student elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.

Students will be referred to Peachview Medical Park for Post-Exposure Evaluation. All students are required to have health insurance, which in this situation will act as primary insurance. Limestone College's Athletic Department Access Insurance will not act as secondary insurance in this situation.

ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

The Director of the Athletic Training Program ensures that health care professional(s) responsible for student's hepatitis B vaccination and post-exposure evaluation and follow-up are given a copy of OSHA's bloodborne pathogens standard.

The Director of the Athletic Training Program ensures that the health care professional evaluating an student after an exposure incident receives the following:

- a description of the student's job duties relevant to the exposure incident
- route(s) of exposure
- circumstances of exposure
- if possible, results of the source individual's blood test
- relevant student medical records, including vaccination status

The Director of the Athletic Training Program provides the student with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

The Director of the Athletic Training Program will review the circumstances of all exposure incidents to determine:

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

ANNUAL BLOODBORNE PATHOGEN TRAINING FOR STUDENTS

All students who have occupational exposure to bloodborne pathogens receive training initially conducted by Athletic Training Faculty Members and thereafter by Safe Colleges: Campus Training for Faculty, Staff, and students.

All students who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

- a copy and explanation of the standard
- an explanation of our ECP and how to obtain a copy
- an explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
- an explanation of the use and limitations of engineering controls, work practices, and PPE
- an explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE * an explanation of the basis for PPE selection
- information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine will be offered free of charge
- information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM
- an explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available
- information on the post-exposure evaluation and follow-up that the employer is required to provide for the student 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.

Training materials for this facility are located in the office of the Director of the Athletic Training Program.

RECORDKEEPING

Training Records Training records are completed for each student upon completion of training. These documents will be kept for at least three years in the ATS Portfolio.

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

Student training records are provided upon request to the student or the student's authorized representative within 15 working days. Such requests should be addressed to the Director of the Athletic Training Program.

Medical Records

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

The Director of the Athletic Training Program is responsible for maintenance of the required medical records. These confidential records are kept for at least the duration of student enrollment plus 30 years.

Student medical records are provided upon request of the student or to anyone having written consent of the student within 15 working days. Such requests should be sent to the Director of the Athletic Training Program

OSHA Recordkeeping

An exposure incident is evaluated to determine if the case meets OSHA's Recordkeeping Requirements (29 CFR 1904). This determination and the recording activities are done by the Athletic Training Staff Members/Clinical Preceptors, Director of the Athletic Training Program, and/or School Nurse. Sharps Injury Log In addition to the 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in the Sharps Injury Log. All incidences must include at least: - the date of the injury - the type and brand of the device involved - the department or work area where the incident occurred -an explanation of how the incident occurred. This log is reviewed at least annually as part of the annual evaluation of the program and is maintained for at least five years following the end of the calendar year that they cover. If a copy is requested by anyone, it must have any personal identifiers removed from the report.

I. HAZARDOUS COMMUNICATION STANDARD POLICY (OSHA 1910-1200)

- A. Purpose: To provide information about the chemicals used at Limestone College Health Services for all employees; as new chemicals are introduced, provide updated information for the staff.
- B. Responsibility: The Director of Health Services or designee will oversee compliance with training and education related to this policy.
- C. Scope: All employees of Limestone College Health Services are responsible for complying with this standard.
- D. Policy: The Director of Health Services will maintain and update Material Safety Data Sheets for chemicals at Health Services.
 - i. A Material Safety Data Book with a list of all chemicals utilized in the clinic is located in the exam room at Health Services and is available at all times for employees to review.
 - ii. Material Safety Data Sheets (MSDSs) are provided by manufacturers for each chemical or group of chemicals.
 - iii. Annually, an education and training program is provided to the Staff of Health Services using various methods of training. Emphasis is placed on chemicals, hazards precautions, handling and first aid if exposure to chemical occurs.
 - iv. Staff Members of Health Services will be made aware of new chemicals before they are used, areas of use, protective equipment available and first aid.
 - v. All containers of hazardous substances must be labeled:
 - 1. If a hazardous chemical is transferred from one container to another and only that one person uses the new container, it need NOT be labeled.
 - 2. If left overnight or used by another person not pouring the chemical, then it MUST be labeled with:
 - a. Common Name
 - b. Chemical Name
 - c. Manufacturer
 - d. Hazardous warning-body parts affected.
 - vi. All new employees of Health Services will receive Hazard Communications training before working with chemicals; and again on an annual basis.
 - vii. Records will be maintained by the Director of Health Services or designee regarding their MSDS training.

I, _____ (print name) have participated in Annual Bloodborne Pathogen Training and reviewed the Exposure Control Plan, and have had ample opportunity to have any and all of my questions answered. My signature indicates that I understand and agree to abide by this policy.

Student Signature: _____

Date: _____