



KETTERING UNIVERSITY

Bloodborne Pathogens Exposure Control Plan

May, 2006

This Bloodborne Pathogens Exposure Control Plan is developed in accordance with the MIOSHA Bloodborne Pathogens Infectious Diseases Standards (R.325.70001-.70018) and the OSHA Bloodborne Pathogens Standard, 29 CFR 1910.1030.

1. EXPOSURE DETERMINATION

Means of Exposure

The OSHA/MIOSHA Bloodborne Pathogen Standards are designed to protect employees who, during the course of their workday, have the potential to become infected with pathogens, which could be carried in blood or other bodily fluids. The standard specifically addresses HIV (Aids), Hepatitis B and Hepatitis C infections. Bloodborne pathogens can infect a person through direct or indirect contact with blood or other bodily fluids from an infected person. Direct methods include the splashing of bodily fluids, such as blood, into the eyes or mouth or onto broken skin or through needle sticks. Exposure by indirect methods can take place when the skin is cut or punctured by a sharp object that has been contaminated or when a contaminated object touches inflamed or broken skin but does not penetrate. Infection can also occur when a person touches a contaminated surface and then rubs or touches their eyes, mouth, nose, or open cut.

This program is designed to prepare employees to protect themselves during first aid activities or cleanup activities. It is designed to educate Residence Hall employees so that they may be protected through the use of universal precautions should the possibility for exposure present itself.

MIOSHA requires employers to perform an exposure determination to identify employees who may incur occupational exposure to blood or other potentially infectious materials (OPIM) as part of their job-related activities, regardless of frequency.

The following employees at Kettering University have been identified:

- Campus Safety Personnel
- Plant Maintenance Personnel
- Custodial and Grounds Personnel
- Faculty Members, as appropriate
- Laboratory Personnel
 - Coordinators
 - Technicians
 - Managers
- Telecommunications Personnel
- Recreation Center Employees
 - Facility Managers
 - Lifeguards
 - Sport Supervisors
- Residence Hall Employees

Residence Hall Advisors (RA's) work in the Residence Hall (dormitories). Should an injury or accident happen, these employees should secure the area and contact Campus Safety at extension 9501 or 911 (for emergencies).

- Zelpha McKinnon Wellness Center Secretary/Medical Assistant/Nurse/Doctor

Kettering University contracts the services performed by the Wellness Center to the McLaren Health Care Corporation. McLaren is responsible for the Bloodborne Pathogen Program for persons working in the Wellness Center.

2. METHODS OF IMPLEMENTING APPLICABLE RULES

A. Compliance Methods

This plan is intended to address emergency situations only.

Training

All employees are trained in a general manner during new employee orientation training. Those employees who may incur occupational exposure to blood or other potentially infectious materials (OPIM) as part of their job related activities are provided with detailed bloodborne pathogen training. Refresher training is provided on an annual basis. Residence Hall Advisor employees are provided bloodborne pathogen awareness training as part of new employee orientation. The training programs are described in Section 3 below.

Hand Washing

Hand washing facilities are available on every floor and in most laboratories for any employee who may incur exposure to blood or other potentially infectious materials. Hands should be washed with water and non-abrasive soap for **15 minutes** as soon as possible after contact with potentially infectious materials. Universal precautions should be used at all times.

Personal Protective Equipment

Persons authorized to provide cleanup services and/or first aid shall utilize personal protective equipment provided by Kettering University.

Effective Date of Plan

This plan is in effect immediately. Review and update of this plan will take place annually. The Director of Environmental Health & Safety (Director of EH&S) is responsible for assuring that this program is effectively implemented. Records relating to this program will be maintained in the Human Resources Department.

B. Operating Procedures and Work Practices

Broken Glass

All broken glass will be picked up using tongs or swept up into dustpans. No broken glass is to be picked up by hand. Broken glass, which may be contaminated with blood or OPIM, will be picked up, placed into an appropriately labeled "Broken Glass" container and disposed of only by trained individuals as set forth in their training program. No material should be retrieved from broken glass containers.

Cleanup Activity

Only employees trained on the use of blood and OPIM spill kits should respond to blood and OPIM incidents. Employees are to follow manufacturer instructions for use. Personal protective equipment as described below shall be used.

Spill Kit Locations

Bloodborne Pathogen/OPIM spill kits are located at the Campus Safety desk, in the Campus Safety vehicle, at the Recreation Center in the copy room and Sport Supervisor Office and in select Custodial Cribs located in the Campus Center Building (CC), the Academic Building (AB), Thompson Hall (TH) and the C.S. Mott Engineering and Science Center (Mott). They are only to be used by trained employees.

Decontamination

Areas and equipment that have been contaminated with blood or other potentially

infectious materials shall be disinfected and cleaned by trained employees. A solution of 10 parts water to one part bleach or another solution provided by the manufacturer in a bloodborne pathogen cleanup kit shall be used. Where feasible, washing with soap and water will follow this decontamination.

Disposal of Contaminated Materials

All personal protective equipment or other materials contaminated with blood or OPIM, along with contaminated materials used in the cleanup process, shall be disposed of by trained employees. Contaminated materials resulting from Recreation Center activities will be disposed of in the designated and properly marked container located in the Rec. Center equipment issue room. Disposal of contaminated materials generated anywhere else on campus will be through either the Recreation Center or the Zelpha McKinnon Wellness Center.

First Aid

Campus Safety will provide a trained first aid responder who is also a BBP trained employee to assist the injured party. Recreation Center personnel will respond if an injury occurs during recreational activities in the recreation areas. Campus Safety will be notified if transportation from the recreation areas to a medical facility is necessary. Campus Safety can be contacted at extension 9501 or at 911, if an emergency.

First Aid Kits are available in each work area and laboratory where injuries related to work activities may occur. These kits are to be used for self-care by injured parties. In the event of an accident or injury needing more than self-care, Campus Safety should be contacted at 911 or extension 9501. Only trained Campus Safety or Recreation Center personnel should provide first aid.

Student Medical Care

Medical care is provided **only to students**, through the Zelpha McKinnon Wellness Center, which is operated by McLaren Health Care Corporation. The Center will provide **triage, stabilization and referral services only** for injured or ill students and should be notified in the event of a serious accident or illness.

Possible Exposure

In the event that contact with an injured person and/or blood or OPIM could occur, universal precautions should be observed as follows: All blood or OPIM will be considered infectious. Care should be taken to prevent contact with blood or OPIM by using gloves or other barrier material and personal protective equipment. An employee who may have been contaminated should immediately wash or flush the area with water and non-abrasive soap for 15 minutes and then contact their supervisor.

Use of Personal Protective Equipment and Clothing

All personal protective equipment required for response to blood and/or OPIM spills is provided to employees without cost by Kettering University and will be replaced and

disposed by Kettering University at no cost to the employees. Personal protective equipment is chosen based on the anticipated exposure to blood or OPIM.

The following personal protective equipment shall be used based on the task to be performed. Certified first aid providers shall follow accepted first aid procedures.

| Personal Protective Equipment | Task |
|---|---|
| Disposable Gloves – Latex/Rubber/Nitrile | Handling trash Handling broken glass Restroom cleanup Spill clean up Responding to any injury of faculty, staff, student or visitor |
| Protective Eyewear (With side shields) | All laboratory situations Restroom cleanup Spill clean up Responding to any injury of faculty, staff, student or visitor |
| Clothes Covers | Anytime splattering onto clothes may occur |
| Masks (in combination with protective eye wear) | Any response where there is potential for blood splattering into the eyes, nose or mouth of the person responding. |

Utility gloves and disposable gloves, which are contaminated by blood or OPIM, are not to be washed or decontaminated for re-use. They are to be replaced as soon as feasible if they are torn, punctured, or their ability to function as a barrier is compromised. After removal of protective gloves, employees shall wash hands and any other potentially contaminated skin area as soon as possible with non-abrasive soap and water. Disposal of contaminated gloves shall be in accordance with the above paragraph entitled “Disposal of Contaminated Materials”.

Garments contaminated with blood or OPIM shall be removed as soon as possible. All personal protective equipment will be removed prior to leaving the work area.

Sharps

Sharps containers will be provided for academic laboratories where syringes are used for injections into instruments. Containers will also be supplied to students, faculty and staff who use syringes for medication. The Environment, Health and Safety office should be contacted at extension 7904 for replacement and disposal of filled sharps containers. Contaminated needles and other contaminated sharps should not be bent, recapped, removed, sheared or purposely broken.

Non-emergency Response and Cleanup of Blood or OPIM

In a non-emergency situation, when any person other than a trained employee observes a spill of blood or OPIM, they should contact Campus Safety at extension 9501. Campus Safety will arrange for a trained custodial or maintenance employee to respond. Recreation Center personnel can also respond to non-emergency situations in the Recreation Center.

3. TRAINING

All new Kettering University employees are provided Environment, Health, and Safety General Awareness training which covers bloodborne pathogens in a general manner.

Employees who may incur occupational exposure to blood or OPIM as part of their job-related activities are provided with detailed BBP Training, which covers:

1. An explanation of the OSHA standard for Bloodborne Pathogens
2. Epidemiology and symptomatology of bloodborne diseases
3. Modes of transmission of bloodborne pathogens
4. The Exposure Control Plan
5. Procedures which might cause exposure to blood or other potentially infectious materials at this facility
6. Personal protective equipment available at this facility and who should be contacted concerning its use
7. Availability of Hepatitis B vaccinations
8. Post exposure evaluation

Initial training for employees includes the demonstrated use of a Bloodborne pathogen/OPIM spill kit. Annual refresher training may utilize a computer-based training incorporating videotape, written material and exam. The outline for the training program is located in the EH&S file system in the Human Resources office.

McLaren Health Care Corporation is responsible for bloodborne pathogen and infectious disease training for their employees and activities within the Zelpha McKinnon Wellness Center as well as for Kettering employees who work in the Wellness Center.

4. MEDICAL RECORDKEEPING

HBV Vaccinations

At the time of training, Kettering University offers employees identified in Section 1 (except for Residence Hall Advisors) a Hepatitis B Vaccination (HBV) series at no charge to the employees. If the employee declines the HBV vaccination series, they will be asked to sign a waiver statement. Participation in the vaccination program is not a prerequisite for a position at Kettering University, nor is participation in a prescreening program, which evaluates immunity to HBV, required before receiving the vaccination series.

Exposure Evaluation

Any employee who may have been exposed to blood or OPIM should report it to their supervisor immediately. The supervisor shall inform the Director of Environment, Health and Safety as soon as possible so that medical follow-up may be arranged. These employees will be offered post-exposure evaluation as soon as possible in accordance with MIOSHA Rule 325.70013. A written evaluation and opinion will be requested from the attending health care professional.