



Pathogen Exposure

Control Plan

&

General Safety Plan

Revised
Sept. 2010



EXPOSURE CONTROL PLAN

FOR

ARIZONA COLLEGE OF ALLIED HEALTH

The following pages contain the exposure control plan for our facility. This plan identifies potential exposure hazards and specific procedures for protection against them. Included are steps to follow in the event of an exposure incident and additional information as required by 29 CFR Part 1910.1030, Occupational Exposure to Bloodborne Pathogens, Final Rule.

Please read the plan carefully. Any and all questions should be directed to the Safety Officer of the facility. Additional copies may be obtained from your administrator.

A copy of the Exposure Control Plan will be kept in all laboratory areas.

JOB CLASSIFICATIONS ACCORDING TO EXPOSURE POTENTIAL

Arizona College will determine exposure category of all employees by developing a list of all job classifications in which employees have an occupational exposure.

An "Occupational Exposure" is defined by OSHA as:

Reasonable anticipated skin, eye, mucous membrane, non-intact skin, or parental contact with blood or other potentially infectious materials that may result from the performance of an employee's duties.

In determining and developing the list of job classifications, the duties, tasks, and procedures that place an employee at risk of occupational exposure, regardless of protective clothing or equipment, must be considered.

There are three categories of job classifications:

Category I Employees whose routine and/or daily duties, tasks, or procedures **always** expose them to blood and other potentially infectious materials.

Category II Employees whose routine and/or daily duties, tasks, or procedures **occasionally** expose them to blood and other potentially infectious materials.

Category III Employees whose routine and/or daily duties, tasks, or procedures **never** expose them to blood and other potentially infectious materials.

EXPOSURE DETERMINATION

(To comply with 1910.1030)

In compliance with 1910.1030 ©(1)(I), this Exposure Control Plan designed to eliminate or minimize employee exposure to Bloodborne Pathogens.

1. The following job classifications within our organization have reasonably anticipated exposure to bloodborne pathogens.

Category I: All Medical, Dental, Phlebotomy, EKG/Laboratory Assisting Instructors directly responsible for teaching and supervision of laboratory procedures.

Category II: All school Administrators, Directors, and Assistant Directors, who might assist or substitute teach in these areas.

Any and all instructors who might assist in the instruction of laboratory procedures or individuals cross-trained to teach laboratory procedures.

2. The following classifications within our organization have no anticipated risk of exposure to bloodborne pathogens:

Category III:

- A. Admissions Representatives
- B. Administrative Staff (Admissions Coordinator, Administrative Assistants)

TRAINING RECORDS

1. Training records shall include the following information:
 - A. The dates of the training session.
 - B. The contents or a summary of the training session.
 - C. The names and qualifications of persons conducting the training.
 - D. The names and job titles of all persons attending the training sessions.
2. Training records shall be maintained for three years from the date on which the training occurred.

RECORD AVAILABILITY

1. The employer shall ensure that all records required to be maintained by this section shall be made available upon request to the Executive Assistant or Director for examination and copying.
2. Employee training records by the regulations shall be provided upon request for examination and copying to employees, to employee representatives, to the Director, and to the Executive Assistant.
3. Employee medical records required by the regulations shall be provided upon request for examination and copy to the subject employee, to anyone having written consent of the subject employee, to the Director and to the Executive Assistant.

TRANSFER OF RECORDS

1. The employer shall comply with the requirements involving transfer of records as they are set forth in the regulation.
2. If the employer ceases to do business and there is no successor employer to receive and retain the records for the prescribed period, the employer shall notify the Director, at least three months prior to their disposal and transmit them to the Director, if required by the Director to do so, within that three month period.

RECORD KEEPING

1. The employer will establish and maintain an accurate record for each employee with occupational exposure.
2. This record shall include:
 - A. The name and social security number of the employee;
 - B. A copy of the employee's hepatitis B vaccination status including the dates of all the hepatitis B vaccinations and any medical records relative to the employee's ability to receive the vaccination;
 - C. Documentation regarding any exposure incidents;
 - D. A copy of all examinations, medical testing, and follow-up procedures;
 - E. The employer's copy of the health care professional's written opinion;
 - F. A copy of the information provided to the health care professional; and,
 - G. Documentation of training and risk reduction procedures.
3. Confidentiality. The employer shall ensure that employee medical records are:
 - A. Kept confidential; and
 - B. Are not disclosed or reported without the employee's express written consent to any person within or outside the workplace except as required by this section as may be required by law.
4. The employer shall maintain the records required for at least the duration of employment plus 30 years.
5. The Safety Officer will assume responsibility for trending illnesses and injuries and completing, maintaining and posting the OSHA 200 log.

POST EXPOSURE FOLLOW-UP

Practice Name: Arizona College

What follows is our procedure in the event of an Exposure Incident

Following receipt of the completed exposure report within the time frame according to policy, we will:

1. Counsel worker regarding risk of HIV infection and symptoms to report
2. Counsel worker regarding need to prevent potential transmission of HIV during incubation period; especially during first 12 weeks
3. Obtain consent/declination for clinical evaluation and drawing blood for baseline testing, and perform these procedures at time of exposure. (Worker blood may be held for 90 days to test at a later date if testing is initially refused)
4. Counsel source and obtain consent/refusal for HIV/HBV antibody testing
5. Provide confidential medical evaluation, counseling, and testing for exposed employee
6. Provide medical professional with necessary records and information
7. Provide necessary prophylaxis and treatment
8. Provide post-exposure counseling, re-education and training
9. Provide any disciplinary action indicated
10. Maintain incident documents in employee's confidential file. (All such exposures or injuries will be kept in a log so individual and aggregate data can be evaluated.)