

SHARE FOUNDATION
CHAPLAINCY SERVICES & EDUCATION
EXPOSURE CONTROL PLAN

May 01, 2007

Chaplaincy Services and Education, a division of SHARE Foundation is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this endeavor, the following ECP (Exposure Control Plan) 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." The Plan will be administered by Linda Stringfellow, President/COO, or her designee.

The ECP is a key document to assist our organization in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP includes:

- Determination of employee exposure
- Implementation of various methods of exposure control including,
 - Universal precautions
 - Engineering and work practice controls
 - Personal protective equipment
 - Housekeeping
- Hepatitis B vaccination
- Post-exposure evaluation and follow-up
- Communication of hazards to employees and training
- Recordkeeping

The methods of implementation of these elements of the standard are discussed in the subsequent pages of this ECP.

Employees in the Chaplaincy Services and Education Department must abide by the MCSA ECP. A copy is attached.

DEFINITIONS

The standard definitions for terms associated with bloodborne pathogens. Some of the more critical definitions are:

Other Potentially Infectious Material – any human body fluids (semen, vaginal secretions, cerebrospinal, synovial pleural, pericardial, peritoneal, amniotic fluids, saliva; any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids; any unfixed tissue or organ from a human (living or dead); HIV-containing cell or tissue cultures, organ cultures, and HIV or HBV containing culture medium or other solutions.

Contaminated – the presence or the reasonably anticipated presence of blood or other potentially infectious materials on an item or surface.

Occupational Exposure – 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.

Engineering Controls – controls (e.g., containers for disposing sharp objects, self-sheathing needles) that isolate or remove the bloodborne pathogens hazard from the workplace.

Work Practice Controls – controls that reduce the likelihood of exposure by altering the manner in which a task is performed (e.g., prohibiting recapping of needles using a two-handed technique).

PROGRAM ADMINISTRATION

- The Director of Chaplaincy Services and Education is responsible for the implementation of the ECP in that department. He or she will maintain, review and update the SHARE ECP at least annually, and whenever necessary to include new or modified tasks and procedures. Contact location: MCSA, 460 West Oak St. phone number: office 863-2498 or cell 870-866-2802.
- Those employees who have occupational exposure to blood or OPIM (other potentially infectious materials) must comply with the procedures and work practices outlined in this ECP.
- The SHARE Human Resources Department will be responsible for ensuring that all medical actions required are performed and that appropriate employee health and OSHA records are maintained. Contact location: 403 West Oak, Suite 103, phone number: (870) 881-9015.
- The SHARE Human Resources Department will be responsible for training, documentation of training, and making the written ECP available to employees. Contact location: 403 West Oak, Suite 103, phone number: (870) 881-9015.
- Since this department works within MCSA, please refer to the MCSA ECP. Questions should be referred to the Infection Control Office for facility specifics. Contact location: 700 West Grove, phone number: (870) 864-3500

EMPLOYEE EXPOSURE DETERMINATION

There is only one employee in this department and that employee does have some occupational exposure. Included is a list of tasks in which occupational exposure may occur:

<u>Job Title</u>	<u>Task</u>	<u>Location</u>
Dir.Chaplaincy Services and Education	patient visitation	MCSA

Part-time, temporary, contract and per diem employees are covered by the standard.

METHODS OF IMPLEMENTATION AND CONTROL

Universal Precautions

Universal precautions is an approach to infection control. According to the concept of universal precautions, all human blood and certain human body fluids are treated as if known to be infectious for HIV, Hepatitis B and other bloodborne pathogens. All employees will utilize universal precautions.

Exposure Control Plan

Employees covered by the bloodborne pathogens standard receive training of this ECP during their initial employee orientation. It will also be reviewed in their required annual training. All employees have an opportunity to review this plan at any time during their work shifts by contacting the Director of Chaplaincy Services and Education. If requested, the SHARE Human Resources Department will provide an employee with a copy of the ECP free of charge within 15 business days of the request.

Chaplaincy Services and Education employees also receive annualized training of the MCSA ECP. A copy of the MCSA ECP can be requested free of charge from the MCSA Infection Control Office located at 700 West Grove, El Dorado, AR or by calling (870) 864-3500.

The Director of Chaplaincy Services and Education is responsible for reviewing and updating the SHARE ECP annually to reflect any new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure. Changes will be referred to the SHARE Human Resources Department.

Engineering Controls and Work Practices

Please refer to the MCSA ECP for specific practices at that facility.

SHARE requires engineering controls and work practice controls 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 (or antiseptic cleansers and towels or antiseptic towelettes) are readily accessible to employees who have the potential for exposure
- Employees will wash their hands immediately or use waterless antiseptic hand cleanser as soon as feasible after removal of gloves or other PPE
- Employees will wash their hands or other skin with soap and water, or flush mucous membranes with water immediately or as soon as feasible following an exposure incident

- Employees are prohibited from eating, drinking, applying cosmetics, lip balm, or handling contact lenses when blood or OPIM are present
- Food and drink are not allowed where blood or OPIM are present
- Employees will wear PPE when the potential for exposure occurs

There are no sharps disposal containers in this office to be inspected or maintained.

This facility identifies the need for changes in engineering control and work practices through review of OSHA records and employee interviews/input.

All employees that utilize PPE will be involved in the selection process. Employees will be provided samples along with proper instructions and demonstration of use to evaluate, inspect, compare and/or operate when purchasing new PPE. Questionnaires or evaluation forms will be made available for specific products. Employees will prioritize their recommendations at the end of the evaluation process.

The Director of Chaplaincy Services and Education will ensure effective implementation of these recommendations.

Personal Protective Equipment

Please refer to the MCSA ECP for specific practices at that facility.

PPE is provided to our employees at no cost to them. PPE will be chosen based on the anticipated exposure to blood or other potentially infectious materials. Training is provided by the MCSA Infection Control Office annually in the use of appropriate PPE for the tasks or procedures employees will perform in their job classification. Training also includes how to properly don, doff, adjust and wear it, its limitations, proper care, maintenance, useful life and proper disposal.

The types of PPE available to employees are as follows:

<u>PPE</u>	<u>Task(s)</u>
Gloves	When visiting patients under universal precautions
Disposable gown / lab coat	When visiting patients under universal precautions
Mask	When visiting patients under universal precautions

PPE is located outside rooms of patients designated for universal precautions, and may be obtained through the Infection Control Department by contacting that department directly or by contacting the unit nurse overseeing that patient.

All employees using PPE must observe precautions as outlined in the MCSA ECP. SHARE Foundation requires the following:

- Wash hands immediately or as soon as feasible after removal of gloves or other PPE

- Remove PPE after it becomes contaminated, and before leaving the work area
- 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
- Disposable gloves are not to be washed or decontaminated for re-use
- Wear appropriate face and eye protection when blood or OPIM pose a hazard to the eye, nose, or mouth
- Any garment contaminated by blood or OPIM is to be removed immediately or as soon as feasible, in such a way as to avoid contact with the outer surface

The procedure for handling used and / or contaminated PPE is as follows:

- Used PPE will be disposed of in red bio-hazard waste containers for that purpose
- All employees using PPE must observe handling procedures as outlined in the MCSA ECP

Housekeeping

The workplace will be maintained in a clean and sanitary condition.

Regulated waste is not kept in this department. Regulated waste is placed in containers in patient rooms or on patient floors which are closeable, constructed to contain all contents and prevent leakage, puncture-resistant, appropriately labeled or color-coded (see Labels section), and closed prior to removal to prevent leakage or protrusion of contents during handling. If leakage is possible, containers will be doubled bagged. Containers are located within easy access of employees and as close as feasible to the sources of the waste.

- There is no disposal of sharps, sharps containers or handling of needles by this department
- There are no housekeeping duties performed by this department

Laundry

There is no handling of laundry by this department.

Labels

This department is not responsible for labeling equipment or regulated waste containers located at MCSA.

MCSA nursing staff will ensure warning labels are affixed or red bags are used as required. Employees are to notify the MCSA Infection Control Department if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc. without proper labels.

Hepatitis B Vaccination

The SHARE Human Resources Department will provide training to employees in their initial employee orientation on Hepatitis B vaccinations, addressing the safety, benefits, efficacy, methods of administration and availability.

All employees regardless of their exposure will be offered the Hepatitis B vaccine at no cost to the employee. The vaccine will be offered to the employee after training and within 10 days of their initial assignment.

Employees who decline the Hepatitis B vaccine are required to sign a declination statement (Attached as Exhibit A). Employees who initially decline the vaccine may request and obtain the vaccine at a later date at no cost. Documentation of refusal is kept in the employee's confidential folder in Human Resources.

The vaccination will be provided by the Union County Health Department at 301 American Road.

Post-Exposure Evaluation and Follow-Up

Should the employee incur an exposure incident, it should be reported to the SHARE Human Resources Department (870) 881-9015 and the MCSA Infection Control Department (870) 864-3500.

All employees who incur an exposure incident will be offered post-exposure evaluation and follow-up with a licensed physician. Please refer to the MCSA ECP for specific requirements.

The SHARE Human Resources Manager will record all percutaneous injuries from contaminated sharps in the Sharps Injury Log (Attached as Exhibit E).

Employee Training

In the initial employee orientation the SHARE Human Resources Department provides all employees:

- A copy and explanation of the bloodborne pathogens standard
- A copy and explanation of the Exposure Control Plan
- Information on the Hepatitis B vaccine, addressing the safety, benefits, efficacy, methods of administration and its availability 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 post-exposure evaluation and follow-up that the employer is required to provide for the employee following and exposure incident

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

- 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
- 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

Training materials for this facility are available in the SHARE Human Resources Department. All employees are required to receive annual refresher training.

Employees in this department also receive annualized MCSA ECP training.

Recordkeeping

Training Records

Training records are completed for each employee upon completion of training. These documents are kept for at least three years in the SHARE Human Resources Department.

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

Employee training records are provided upon request to the employee or the employee's authorized representative within 15 business days. Such requests should be addressed to the SHARE Human Resources Director.

MCSA training records are kept in the Infection Control Office located at 700 W. Grove. Please refer to the MCSA ECP.

Medical Records

Medical records are maintained for each employee with occupational exposure in accordance with 29 CFR 1910.1020.

The SHARE Human Resources Director is responsible for maintenance of the required medical records. These confidential records are kept in the Human Resources Department for at least the duration of employment plus 30 years.

Employee medical records are provided upon written request of the employee or to anyone having written consent of the employee within 15 business days. Such requests should be sent to SHARE Foundation, Human Resources Department, 403 W. Oak, Suite 103, El Dorado AR 71730.

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 SHARE Human Resources Department.

Please refer to the MCSA ECP for their recordkeeping requirements.

Sharps Injury Log

In addition to the 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in the SHARE Sharps Injury Log. All incidents must include at least:

- The date of 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

The 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.

Exhibit A

Hepatitis B Vaccine Consent/Release Form

Name of Subject: _____

Date: _____

I. Complete this section if the subject is a high risk employee (check one of the following statements):

- A. _____ I have received the Hepatitis B vaccine. (proof or documentation of this statement should be presented and noted by the witness)
- B. _____ I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring Hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine at no charge to myself. However, I decline Hepatitis B vaccination at this time. I understand that by declining this vaccine I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine, I can receive the vaccination series at no charge to me. I release SHARE Foundation from liability for any results that may occur because of my refusal.
- C. _____ I have not or do not know whether I have had the Hepatitis B vaccine and wish to receive it.

Witness' Signature

Employee's Signature

II. Complete this section as vaccine is administered:

Lot No.	Administered by	Date	Signature of Subject
_____ Initial	_____	_____	_____
_____ One Month	_____	_____	_____
_____ Six Month	_____	_____	_____

Exhibit B

CLIENT ANTIBODY TESTING CONSENT

Client: _____

Facility: _____

We are requesting to obtain a blood specimen from you for laboratory analysis because of an occupational exposure to one of our employees. OSHA (Occupational Safety and Health Administration) requires us to test the specimen for HBV (hepatitis B virus) and HIV (human immunodeficiency virus) to investigate all occupational exposures to bloodborne pathogens and other potentially infectious materials. Your consent is required to perform this analysis. You will be notified of your results by your personal physician.

Patient's printed name

Patient's signature

Date

Facility Manager

Date

Exhibit C

EMPLOYEE TESTING CONSENT

Patient: _____

Facility: _____

I am consenting to supply a blood specimen for laboratory analysis because of an occupational exposure to myself. I understand OSHA (Occupational Safety and Health Administration) requires the specimen be tested for HBV (hepatitis B virus) and HIV (human immunodeficiency virus) to investigate all occupational exposures to bloodborne pathogens and other potentially infectious materials. My consent is required to perform this analysis. I will be notified of results by my personal physician.

Employee's printed name

Employee's signature

Date

Supervisor or Human Resources Dept.

Date

