

IOWA SCHOOLS

BLOODBORNE PATHOGEN GUIDANCE

2017-2018



Bloodborne Pathogens Standard Guidance

Preface: The purpose of the United States Department of Labor, Occupational Safety and Health Act (OSHA), Occupational Exposure to Bloodborne Pathogens Regulations and Standards, adopted by the Iowa Division of Labor, Occupational Safety and Health Bureau, is to end and reduce employee exposure to blood and other potentially infectious materials (OPIM). The laws require Iowa schools and education agencies, as employers, to develop an occupational exposure to bloodborne pathogens program. The program includes written policy and plan guidelines for employees. The school works with local health agencies, health providers, non-managerial school staff, and school personnel in developing the program and educating personnel, families, students, and the community to prevent potential exposures (United States Code 29 U.S.C. 661 et seq. Occupational Safety and Health Act and U.S. Code of Federal Regulations 29 CFR 1910.1030). The answers to these frequently asked questions are located on the links to the United States Department of Labor [USDOL] Most Frequently Asked Questions Concerning the Bloodborne Pathogens, USDOL Bloodborne Standard Code of Federal Regulations, Iowa Division of Labor and Iowa Department of Public Health. The information contained in this document is not considered a substitute for any provisions of the Occupational Safety and Health Act of 1970 (OSH Act) or the requirements of 29 CFR 1910.1030, Occupational Exposure to Bloodborne Pathogens.

Prevention and control of communicable diseases is included in the school district's bloodborne pathogens exposure control plan. The procedures will include scope and application, definitions, exposure control, methods of compliance, universal precautions, vaccination, post-exposure evaluation, follow-up, communication of hazards to employees and record keeping. This plan is reviewed annually by the superintendent and school nurse.

Bloodborne Pathogens Frequently Asked Questions

1. *Question: Who in the school or district is covered by the standard?*

Answer: (Located under "[Scope](#)" Question and Answer 1)

2. *Question: Are school nurses, school employees who regularly provide first aid or employees who perform janitorial duties covered by the standard?*

Answer: (Located under "[Scope](#)" Question and Answer 6-7)

3. *Questions: When must Hepatitis B vaccinations be offered to employees, can a Hepatitis B titer serological screening for the employee be required by the district or school, can a school employee refuse the vaccination, may the school or district require to have the employee sign a declination form, who is responsible to pay for the vaccine and how to handle post-exposure?*

Answer: (Located under "[Hepatitis B Vaccination and Post-Exposure Evaluation and Follow-up Procedures](#)" Question and Answers 50-64)

Bloodborne Pathogens Frequently Asked Questions

4. *Question: Who keeps employee's medical records and for how long related to Hepatitis B vaccination status and any medical records relative to the employee's ability to receive the vaccination; copies of all results of examinations, medical testing and follow-up procedures; copies of the healthcare professional's written opinion; and copies of the information provided to the healthcare professional?*

Answer: (Located under "[Recordkeeping](#)" Question and Answers 76-77)

5. *Question: How would a school employee obtain a record of their immunization status?*

Answer: A school employee would contact their former or current healthcare provider.

6. *Questions: What is considered regulated waste, how is it disposed of and how should sharps be handled for employees, visitors, and students in a school or district?*

Answer: (Located under "[Regulated Waste](#)" Question and Answers 36-42)

7. *Question: Would an online course or video watched by school or district personnel meet the training requirement for bloodborne pathogens?*

Answer: No. The standard for the course includes a requirement for the opportunity to have interactive questions and answers with the person conducting the training session and the person conducting the training shall be knowledgeable in the subject matter covered by the elements contained in the training program as it relates to the workplace that the training will address. The trainer must be accessible to employees during the time of training. ([Code of Federal Regulations \[CFR\] 1910.1030\(q\)\(2\)\(vii\)\(N\)](#); [CFR 1910.1030\(q\)\(2\)\(viii\)](#)).

8. *Question: What are the minimum training program requirements for Bloodborne Pathogens?*

Answer: (located by following the link to the Code of Federal Regulations (CFR) and reviewing [CFR 1910.1030\(g\)\(2\)\(vii\)\(A\)](#) to [CFR 1910.1030\(g\)\(2\)\(ix\)\(C\)](#))

9. *Questions: When does a district or school complete a Bloodborne Pathogen educational course, who provides the course, what qualifications are require to teach the course, how long are training records maintained?*

Answer: (Located under "[Communication of Hazards to Employees](#)" Question and Answers 70 to 75 and under "Recordkeeping" Question and Answers 79-80)

10. *Question: Does the Iowa Division of Labor provide educational resources for Bloodborne Pathogen and other OSHA Trainings?*

Answer: Yes. The Iowa OSHA Education offers free training on safety and health topics. Consultants from Iowa OSHA are also available to answer questions, attend seminars and conferences. Employers may request training by completing the [request for services by educational staff](#). Schools may request training resources at: [Iowa OSHA Education Services](#)

Bloodborne Pathogens Frequently Asked Questions

11. *Question: What type of personal protective equipment (PPE) do school personnel need to wear when working with blood or other potentially infectious materials (OPIM), who is responsible for providing it?*

Answer: (Located under "[Personal Protective Equipment](#)" Question 28 and 30)

12. *Question: When should gloves be changed, what is universal precautions, are gloves required when administering an injection and what alternatives are available for employees who have allergies to the gloves provided by the school or district?*

Answer: (Located under "[Gloves](#)" Question 32-34 and under "[Universal Precautions](#)" Question 15)

13. *Question: Where would a district or school report communicable diseases?*

Answer: The Iowa Department of Public Health [IDPH] has a list of diseases in a table with the time frame specified and how to report that is required by Iowa Administrative Code [641] Chapter 1. (Located under the [Reportable Communicable Disease and Infectious Conditions](#) webpage)

14. *Question: What contents should be included in an Exposure Control Plan and where can a sample sharps injury log be located?*

Answer: OSHA has a sample exposure control plan which is required by the Bloodborne Pathogens Standard and a sample sharps injury log located at [Model Exposure Control Plan](#).

Sample Hepatitis B Declination Form

District or School Name

The following statement of declination of hepatitis B vaccination must be signed by an employee who chooses not to accept the vaccine. The statement can only be signed by the employee following appropriate training regarding hepatitis B, hepatitis B vaccination, the efficacy, safety, method of administration, and benefits of vaccination, and that the vaccine and vaccination are provided free of charge to the employee. The statement is not a waiver; employees can request and receive the hepatitis B vaccination at a later date if they remain occupationally at risk for hepatitis B.

Hepatitis B Declination Statement

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 me; 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.

Employee Signature: _____

Date: _____

Bloodborne Pathogens and Acute Care Facilities. OSHA Publication 3128, (1992).

References

Iowa Department of Public Health. (2017). *Reportable Communicable Disease and Infectious Conditions*. Retrieved from: <https://idph.iowa.gov/CADE/reportable-diseases>

Question 7. (2017). *Code of Federal Regulations [CFR] 1910.1030(q)(2)(vii)(N)*. Retrieved from: https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=28325

Question 7. (2017). *CFR 1910.1030(q)(2)(viii)*. Retrieved from: https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=25992

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United States Department of Labor. (2017). *Occupational Safety and Health Administration Standard Interpretations*. Retrieved from: https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=21010#hazards