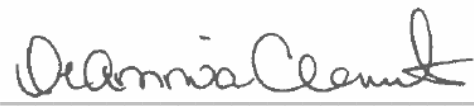




**Exposure Control Plan  
for Bloodborne Pathogens and Airborne  
Pathogens/Tuberculosis  
Wiregrass Georgia Technical College  
2023-2024**

REVIEWED:  DATE: 3/25/2023  
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APPROVED:  DATE: 3/29/2023  
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REVIEWED:  DATE: 07/10/23  
EMERGENCY MANAGER  
TECHNICAL COLLEGE SYSTEM OF GEORGIA

APPROVED: N/A DATE: \_\_\_\_\_  
DIRECTOR OF PUBLIC SAFETY  
TECHNICAL COLLEGE SYSTEM OF GEORGIA

# **Wiregrass Georgia Technical College Exposure Control Plan for Occupational Exposure to Bloodborne Pathogens and Airborne Pathogens/Tuberculosis 2022-2023**

## **INTRODUCTION**

The State Board of the Technical College System of Georgia (SBTCSG), along with its technical colleges and work units, is committed to providing a safe and healthful environment for its employees, students, volunteers, visitors, vendors and contractors. SBTCSG Policy 3.4.1. Emergency Preparedness, Health, Safety and Security compels technical colleges and work units to eliminate or minimize exposure to bloodborne and airborne pathogens in accordance with OSHA Standard 29 CFR 1910.1030, "Occupational Exposure to Bloodborne Pathogens" as well as Centers for Disease Control (CDC) "Guidelines for Preventing the Transmission of Mycobacterium tuberculosis in Health-Care Facilities, 2005." In pursuit of this goal, the Exposure Control Plan (ECP) is maintained, reviewed, exercised and updated at least annually to ensure compliance and protection for employees and students.

This Exposure Control Plan includes:

- clarification of program administration
- determination of employee and student exposure
- implementation of various methods of exposure control
  - standard precautions
  - engineering and administrative controls
  - personal protective equipment (PPE)
  - housekeeping
  - laundry
  - labeling
- vaccination for hepatitis B
- evaluation and follow-up following exposure to bloodborne/airborne pathogens (tuberculosis)
- evaluation of circumstances surrounding exposure incidents
- communication of hazards and training and
- recordkeeping

## I. PROGRAM ADMINISTRATION

- A. Frank Barnett serves as the Exposure Control Coordinator (ECC) and is responsible for the implementation, maintenance, review, and updating of the Exposure Control Plan (ECP). The ECC will be responsible for ensuring that all required medical actions are performed and that appropriate health records are maintained. Further, the ECC will be responsible for training, documentation of training as well as making the written ECP available to employees, students, and any compliance representatives.

### Contact Information for Exposure Control Coordinator

**Frank Barnett**

**229-259-5581 (o)**

**frank.barnett@wiregrass.edu**

- B. Those employees and students who are determined to be at risk for occupational exposure to blood, other potentially infectious materials (OPIM) as well as at risk for exposure to airborne pathogens/tuberculosis must comply with the procedures and work practices outlined in this ECP.
- C. Wiregrass Georgia Technical College is responsible for the implementation, documentation, review, and training/record keeping of standard precautions with respect to the areas of personal protective equipment (PPE), decontamination, engineering controls (e.g., sharps containers), administrative controls, housekeeping, laundry, and labeling and containers as required as assigned to designees. Further, adequate supplies of the aforementioned equipment will be available in the appropriate sizes/fit.

Contact Information for Responsible Person(s) or Department(s):

<b>Program/Department</b>	<b>Program Coord./ Director</b>	<b>Contact Number 229-333-2100</b>	<b>Category</b>
Adult Education Services	Kelly Peacock	Ext. 2078	II
Barbering	Wayne Lee	Ext. 3023	II
Child Development Specialist	Rene Mason	Ext. 2127	II
Criminal Justice Technology	Greta Smith	Ext. 2247	II
Dental Assisting	Sandi Woodward	Ext. 5533	I
Dental Hygiene	Sandi Woodward	Ext. 5533	I
Early Childhood Care and Education	Rene Mason	Ext. 2127	II
EMS Professions	Shawn Tatham	Ext. 3110	I
Esthetician	Kaleigh VanLandingham	Ext. 3025	II
Hemodialysis Patient Care Specialist	TBD/Inactive	TBD/Inactive	I

Infant/Toddler Child Care Specialist	Rene Mason	Ext. 2127	II
Maintenance (North)	Dennis Crook	Ext. 2072	II
Maintenance (South)	Michael Fletcher	Ext. 3075	II
Medical Assisting	Stevan Van Hook	Ext. 6494	I
Neuromuscular Massage Therapist	Amanda Garnto	Ext. 2666	II
Nursing	Georgianne Bauer	Ext. 3053	I
Optical	Lisa Griffin	Ext. 3102	II
Paramedicine	Shawn Tatham	Ext. 3110	I
Patient Care Assistant	Stacey Register	Ext. 3101	I
Phlebotomy Technician	Stacey Register	Ext. 3101	I
Practical Nursing	Adrienne Young	Ext. 2039	I
Radiologic Technology	Jennifer Ray	Ext. 3070	I
Surgical Technology	Katrina Bohanon	Ext. 3069	I
Wiregrass Police Department	Timothy Allmond	Ext. 2241	II

- D.** Wiregrass Georgia Technical College engages in the following contractual agreements regarding exposure control: Stericycle, South Health District, and Southeast Health District of the Department of Health. These agreements are located in the office of the Vice President for Administrative Services and are located on the college's intranet.
- E.** Wiregrass Georgia Technical College engages in the following training, drills, and exercises regarding exposure control. Training, drills, and exercises are planned and/or performed for/with students by the individuals listed in I.C. Training, drills, and exercises are planned/performed for employees by the Director of Human Resources and Employer Services. The retention of training records for students are kept by the program coordinators listed in I.C. and by the Director of Human Resources and Employer Services for employees.
- F.** The protocol for the annual review of the Wiregrass Georgia Technical College ECP is reviewed and/or revised by the ECC, Vice President for Facilities, and the Safety Committee. Once the review and revisions are made, the ECP is presented to the President or designee of the college for approval and sent to TCSG. The ECP may be located in each classroom and will be published on the college's intranet. To access the ECP, complete the following:
- 1- Enter my.wiregrass.edu into the address bar of your web browser
  - 2- Log into the WGTC Intranet using your wiregrass credentials
  - 3- From the Home sub-site, click on the scroll down to Facilities Resources Tab select 'Campus Safety Plans' folder the ECP document is within the list of documents.

## II. EXPOSURE DETERMINATION

Employees/or students are identified as having occupational exposure to bloodborne/airborne pathogens based on the tasks or activities in which they engage. These tasks or activities are placed into categories as defined by the 1987 joint advisory notice by the U.S. Department of Labor and the U.S. Department of Health and Human Services. The relative risk posed by these tasks or activities, as well as the measures taken to reduce or eliminate risk of occupational exposure are also determined by the category.

**Category I:** A task or activity in which direct contact or exposure to blood, other potentially infectious materials, or airborne pathogens (tuberculosis) is expected and to which standard precautions apply.

**Category II:** A task or activity performed without exposure to blood or other potentially infectious materials, or airborne pathogens (tuberculosis) and to which standard precautions apply, but exposure to another person's blood or to OPIM might occur as an abnormal event or an emergency or may be required to perform unplanned Category I tasks or activities.

**Category III:** A task or activity that does not entail normal or abnormal exposure to blood or other potentially infectious materials, or airborne pathogens (tuberculosis) and to which standard precautions do not apply.

Employees or students who engage in tasks or activities which are designated as Category I or II, as well as their occupational area, are considered to be "covered" by the parameters of the ECP, including part-time, temporary, contract and per-diem employees.

The following is a list of job and/or student program classifications which have Category I or II occupational exposure. Included is a list of the tasks or activities or groups of closely related tasks or activities in which occupational exposure may occur for these individuals.

Adult Education Services
Advanced Emergency Medical Technician
Barbering
Child Development Specialist
Criminal Justice Technology
Dental Assisting
Dental Hygiene
Early Childhood Care and Education
EMS Professions
Esthetician

Hemodialysis Patient Care Specialist
Infant/Toddler Child Care Specialist
Maintenance (North)
Maintenance (South)
Medical Assisting
Neuromuscular Massage Therapist
Nursing
Optical
Paramedicine
Patient Care Assistant
Phlebotomy Technician
Practical Nursing
Radiologic Technology
Surgical Technology
Wiregrass Police Department

### III. IMPLEMENTATION OF METHODS OF EXPOSURE CONTROL

**A. Standard Precautions:** All covered employees and covered students will use standard precautions as indicated by the task or activity.

**B. Exposure Control Plan:**

1. All covered employees and covered students will receive an explanation of this ECP during their initial training or academic experience, as well as a review on an annual basis. All covered employees and covered students can review this ECP at any time while performing these tasks or activities by contacting Lydia Hubert, Director of Marketing and Public Relations. If requested, a hard copy of this ECP will be provided free of charge within 3 business days of request.
2. The ECC will review and update the ECP annually, or more frequently if necessary to reflect any new or modified tasks or activities that affect occupational exposure and to reflect new or revised employee classifications or instructional programs with potential for occupational exposure.

### IV. PERSONAL PROTECTIVE EQUIPMENT

**Follow standard precautions with regard to personal protective equipment for identified Category I and II tasks. The individuals identified in I. C. are responsible for implementing and documenting the following:**

- A.** Appropriate personal protective equipment (PPE) is provided to covered employees at no cost and available to covered students at the student's expense. Training/recording keeping in the use of PPE for specific tasks is provided by the Director of Human Resources and Employer Services or program coordinators.

## **Types of PPE that are provided include the following:**

Types of PPE that are detailed by the specific program/department and are listed in the respective tasking.

- B.** All covered employees and covered students using PPE must observe the following precautions:
  1. Wash hands immediately or as soon as feasible after removing gloves or other PPE.
  2. Remove PPE after it becomes contaminated and before leaving the work area.
  3. Used PPE may be disposed of in correctly identified containers or bags for disposal or laundry.
  4. Wear appropriate gloves when it is 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 or contaminated, or if their ability to function as a barrier is compromised.
  5. Utility gloves may be decontaminated for reuse if their integrity is not compromised. Utility gloves should be discarded if they show signs of cracking, peeling, tearing, puncturing, or deterioration.
  6. Never wash or decontaminate disposable gloves for reuse.
  7. 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.
  8. 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.
  
- C.** The protocol for handling used PPE is as follows: Disposable items/sharps are placed in identified containers/bags and are collected until the disposal company is contacted for removal. Items that are re-usable are laundered by individuals listed in I.C.

## **V. DECONTAMINATION**

**Follow standard precautions with regard to decontamination for identified Category I and II tasks. The individuals identified in I. C. are responsible for implementing and documenting the following:**

- A.** Individuals identified in I.C. are responsible for training/record keeping for decontamination.
- B.** For each category I and II task document the decontamination method required.

## **VI. Engineering and Administrative Controls:**

**Follow standard precautions with regard to engineering and administrative controls for identified Category I and II tasks. The individuals identified in I. C. are responsible for implementing and documenting the following:**

- A.** Engineering and administrative controls are developed and implemented to reduce or eliminate occupational exposure. Specific engineering and administrative controls for specified tasks or activities are listed in the tasking by each program/department.
- B.** Protocol and documentation of the inspection, maintenance and replacement of sharps disposal containers are the responsibility of the individuals identified in I.C.
- C.** The processes for assessing the need for revising engineering and administrative controls, procedures, or products, and the individuals/groups involved are detailed below:

Academic Program Advisory Groups examine exposure control methods during advisory group meetings, and the recommendations are discussed with the ECC by the academic program coordinator(s).

## **VII. HOUSEKEEPING**

**Follow standard precautions with regard to housekeeping for identified Category I and II tasks. The individuals identified in I. C. are responsible for implementing and documenting the following:**

- A.** Regulated waste is placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded, and closed prior to removal to prevent spillage or protrusion of contents during handling.
- B.** The protocol for handling sharps disposal containers is: store items until the disposal company is contacted for removal.
- C.** The protocol for handling other regulated waste is: store items until the disposal company is contacted for removal.
- D.** Contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leak proof on sides and bottoms, and appropriately labeled or color-coded. Sharps disposal containers are available by each program/department locations listed in I.C.
- E.** Bins and pails (e.g., wash or emesis basins) are cleaned and decontaminated as soon as feasible after visible contamination.
- F.** Broken glassware that may be contaminated is only picked up using mechanical means, such as a brush and dustpan.



## **VIII. LAUNDRY**

**Follow standard precautions with regard to laundry for identified Category I and II tasks. The individuals identified in I. C. are responsible for implementing and documenting the following:**

- A.** The following contaminated articles will be laundered on site in the laundry room and by the individuals identified in I.C. and on an as needed basis.
- B.** The following laundering requirements must be met (document procedures):
  1. Handle contaminated laundry as little as possible, with minimal agitation.
  2. Place wet contaminated laundry in leak-proof, labeled or color-coded containers before transport. Use either red bags or bags marked with the biohazard symbol for this purpose.
  3. Wear the appropriate PPE as stated in the tasking by program/department when handling and/or sorting contaminated laundry.

## **IX. LABELING AND CONTAINERS**

**Follow standard precautions with regard to labeling and containers for identified Category I and II tasks. The individuals identified in I. C. are responsible for implementing and documenting the following:**

- A.** The following labeling methods are used in this facility: red bags, red containers, affixed identifiable biohazard labels, and other methods listed in the tasking by the individuals in I.C.
- B.** The program coordinator is responsible for ensuring that warning labels are affixed or red bags are used as required if regulated waste or contaminated equipment is brought into or out of the facility. Covered employees and covered students are to notify the individuals identified in I.C. if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc., without proper labels.

## **X. VACCINATION FOR HEPATITIS B**

- A.** The Director of Human Resources and Employer Services will ensure training is provided to covered employees on hepatitis B vaccinations, addressing safety, benefits, efficacy, methods of administration, and availability. The individuals identified in I.C. will ensure that the same content training to covered students.
- B.** The hepatitis B vaccination series is available at no cost after initial covered employee training and within 10 days of initial assignment to all covered employees identified in the exposure determination section of this plan. The hepatitis B vaccination series is available to covered students at cost after initial covered student training and within 10 days of initial assignment to all covered students identified in the exposure determination section of this plan.
- C.** Vaccination may be precluded in the following circumstances: 1) documentation exists that the covered employee or covered student has previously received the

series; 2) antibody testing reveals that the employee/student is immune; 3) medical evaluation shows that vaccination is contraindicated; or (4) following the medical evaluation, a copy of the health care professional's written opinion will be obtained and provided to the covered employee or student within 15 days of the completion of the evaluation. It will be limited to whether the covered employee or covered student requires the hepatitis B vaccine and whether the vaccine was administered.

- D. However, if a covered employee or covered student declines the vaccination, the covered employee or covered student must sign a declination form. Covered employees or covered students who decline may request and obtain the vaccination at a later date at no cost to covered employees or at cost to covered students. Documentation of refusal of the vaccination is kept in the medical records of the individual.
- E. Vaccination will be provided by various organizations (Urgent Care Facilities, County Health Department, etc.) at various locations in Lowndes, Coffee, Ben Hill, and other counties as needed.

## **XI. POST-EXPOSURE FOLLOW-UP**

- A. Should an exposure incident occur, contact Frank Barnett at the following telephone number 229-259-5581 (o).
- B. An immediate available confidential medical evaluation and follow-up will be conducted and documented by a licensed health care professional. Following initial first aid (clean the wound, flush eyes or other mucous membrane, etc.), the following activities will be performed:
  - 1. Document the routes of exposure and how the exposure occurred.
  - 2. Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).
  - 3. For blood or OPIM exposure:
    - a. 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 employee's/student's health care provider.
    - b. If the source individual is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.
    - c. Exposure involving a known HIV positive source should be considered a medical emergency and post-exposure prophylaxis (PEP) should be initiated within 2 hours of exposure, per CDC recommendations.
    - d. Assure that the exposed employee/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).
    - e. After obtaining consent, collect exposed employee's/student's blood as soon as feasible after exposure incident, and test blood for HBV and HIV serological status.
    - f. If the employee/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 employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.

4. For airborne pathogen (tuberculosis):
  - a. Immediately after the exposure of covered employee or covered student, the responsible supervisor, the technical college or work unit Exposure Control Coordinator (ECC) and the authorized contact person at the clinical or work site shall be notified and should receive documentation in writing. Documentation of the incident is to be prepared the day of the exposure; on an Exposure Incident Report and Follow-Up Form for Exposure to Bloodborne/Airborne Pathogens (Tuberculosis); promulgated within 24 hours of the incident; and recorded in the Exposure Log.
  - b. The exposed covered employee/student is to be counseled immediately after the incident and referred to his or her family physician or health department to begin follow-up and appropriate therapy. Baseline testing should be performed as soon as possible after the incident. The technical college or work unit is responsible for the cost of a post-exposure follow-up for both covered employees and covered students.
  - c. Any covered employee or covered student with a positive tuberculin skin test upon repeat testing, or post-exposure should be clinically evaluated for active tuberculosis. If active tuberculosis is diagnosed, appropriate therapy should be initiated according to CDC Guidelines or established medical protocol.

## **XII. ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP**

- A. The ECC and/or the individuals identified in I.C. ensures that health care professional(s) responsible for the covered employee or student hepatitis B vaccination and post-exposure evaluation and follow-up are given a copy of this ECP.
- B. The ECC and/or The individuals identified in I.C. ensures that the health care professional evaluating a covered employee or student after an exposure incident receives the following:
  1. a description of the covered employee's or covered student's tasks or activities relevant to the exposure incident
  2. route(s) of exposure
  3. circumstances of exposure
  4. if possible, results of the source individual's blood test
  5. relevant covered employee or covered student medical records, including vaccination status
- C. During the 2022-2023 period, five (5) sharps injuries and zero (0) exposure incidents have been reported.

### **XIII. PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT**

- A.** The ECC and the individual identified in I.C. will review the circumstances of all exposure incidents to determine:
  - 1. engineering controls in use at the time
  - 2. administrative practices followed
  - 3. a description of the device being used (including type and brand)
  - 4. protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)
  - 5. location of the incident (O.R., E.R., patient room, etc.)
  - 6. procedure being performed when the incident occurred
  - 7. training records of covered employee or student
  
- B.** The ECC will record all percutaneous injuries from contaminated sharps in a Sharps Injury Log.
  
- C.** If revisions to this ECP are necessary the ECC will ensure that appropriate changes are made. (Changes may include an evaluation of safer devices, adding individuals/occupational areas to the exposure determination list, etc.).
  
- D.** The following protocol will be followed for evaluating the circumstances surrounding an exposure incident: The ECC and the individual(s) identified in I.C. will discuss the incident. After collaboration pertaining the incident, the ECC may recommend corrective action to be applied to mitigate future like incidents.

### **XIV. COMMUNICATION OF HAZARDS AND TRAINING**

- A.** All covered employees and covered students who have occupational exposure to bloodborne/airborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne/airborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:
  - 1. a copy and explanation of the ECP;
  - 2. an explanation of the ECP and how to obtain a copy;
  - 3. an explanation of methods to recognize tasks and other activities that may involve exposure to blood, OPIM, and respiratory hazards including what constitutes an exposure incident;
  - 4. an explanation of the use and limitations of engineering controls, work practices, and PPE;
  - 5. an explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE;
  - 6. an explanation of the basis for PPE selection;
  - 7. 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 to covered employees and at cost to covered students;

8. information on the appropriate actions to take and persons to contact in an emergency involving blood, OPIM or respiratory hazards;
9. 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;
10. information on the post-exposure evaluation and follow-up that the employer/college is required to provide for the covered employee or covered student following an exposure incident;
11. an explanation of the signs and labels and/or color coding required by the standard and used at this facility;
12. an opportunity for interactive questions and answers with the person conducting the training session.

**B.** Training materials are available from Lydia Hubert, Director of Marketing and Public Relations.

## **XV. RECORDKEEPING**

### **A. Training Records**

1. Training records are completed for each covered employee and covered student upon completion of training. These documents will be kept for at least three years in the individuals identified in I.C. and the Director of Human Resources and Employer Services office.
2. The training records include:
  - a. the dates of the training sessions
  - b. the contents or a summary of the training sessions
  - c. the names and qualifications of persons conducting the training
  - d. the names and job titles/department of all persons attending the training sessions
3. Training records are provided upon request to the covered employee or covered student or the authorized representative of the employee or student within 15 working days. Such requests should be addressed to Lydia Hubert, Director of Marketing and Public Relations.

### **B. Medical Records**

1. Medical records are maintained for each covered employee or covered student in accordance with 29 CFR 1910.1020, "Access to Employee Exposure and Medical Records."
2. The individuals identified in I.C. are responsible for maintenance of the required medical records. These confidential records are to be forwarded to the ECC for a period of three (3) years, then archived in the Human Resources Department for at least the duration of employment or attendance plus 30 years.
3. Covered employee or covered student medical records are provided upon request of the employee or student or to anyone having written consent of the employee or student within 3 working days. Such requests should be sent to Lydia Hubert, Director of Marketing and Public Relations.

**C. 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 individuals identified in I.C.

**D. Sharps Injury Log**

1. In addition to the 29 CFR 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in a Sharps Injury Log. All incidences must include at least:
  - a. Date of the injury
  - b. Type and brand of the device involved (syringe, suture needle)
  - c. Department or work area where the incident occurred explanation of how the incident occurred.
2. The Sharps Injury Log is reviewed as part of the annual program evaluation and maintained for at least five years following the end of the calendar year covered. If a copy is requested by anyone, it must have any personal identifiers redacted from the report. The following protocol will be followed for evaluating the circumstances surrounding sharp injuries: The ECC and the individual(s) identified in I. C. will discuss the sharp injury incident. Following collaboration of the sharp injury incident, the ECC may recommend corrective action to be applied to mitigate like incidents.