Mercyhurst University
Athletic Training Program
Bloodborne Pathogens Exposure Control Plan

In accordance with the Occupational Safety Health Administration (OSHA) Bloodborne Pathogens Standard, 29 CFR 1910.1030, the following Exposure Control Plan has been developed:

1. Exposure Determination
OSHA requires employers to perform an exposure determination concerning which employees may incur occupational exposure to blood or other potentially infectious materials. The exposure determination is made without regard to the use of personal protective equipment (i.e., employees are considered to be exposed even if they wear personal protective equipment). This exposure determination affects all full-time athletic trainers on staff and athletic training students at Mercyhurst University working directly with Mercyhurst University athletes or athletes participating on the College campus as part of a program sponsored by or hosted by Mercyhurst University.

The job classifications and associated tasks for these categories are as follows:

A. Athletic Training Staff members will be expected to provide emergency treatment for life-threatening emergencies, including administering mouth-to-mouth resuscitation and controlling bleeding occurring due to participation in athletics. Also, the staff member may be involved in assisting the team physician with suturing, draining blisters, applying band-aids, or shaving calluses.

B. Athletic Training Students will often be required to perform the same tasks when the situation requires.

2. Implementation Schedule and Methodology
OSHA also requires that this plan include a schedule and method of implementation for the various requirements of the standard. The following complies with this requirement:

A. Implementation Methods
Universal Precautions will be observed at this facility in order to prevent contact with blood, blood products, or other potentially infectious materials. All blood, blood product, or other potentially infectious material will be considered infectious regardless of the perceived status of the source or source individual.

Engineering and work practice controls will be used to eliminate or minimize exposure to employees at this facility. Where occupational exposure remains after institution of these controls, personal protective equipment shall be used. (Refer to the Policy and Procedure Manual: All staff and athletic training students will use personal protective equipment in dealing with any potentially infectious material). At this facility, sharps containers, waste disposable bags,
and clearly marked biohazardous waste containers will be used as engineering controls.

The above controls will be examined and maintained on a regular basis, with attention given to the contents of the engineering controls to insure removal once the containers reach ½ to ¾ of capacity. An individual appointed by the Head or Assistant Athletic Trainer shall review the effectiveness of the controls on a semiannual basis.

Hand washing facilities are also available to the employees who incur exposure to blood or other potentially infectious materials. OSHA requires that these facilities be readily accessible after incurring exposure. At this facility there are two-hand washing facilities located in the athletic training room, in each athletic locker rooms, in each coaches locker rooms and in each of the public restrooms. As an alternative a personal antimicrobial wipe is stored in each athletic training student’s fanny pack, or athletic training kit on the site. If this alternate method is used, the hands are to be washed with soap and running water as soon as feasible following and exposure.

After proper removal and disposal of personal protective gloves or other personal protective equipment, staff and athletic training student shall wash their hands of any other potentially contaminated skin area immediately or soon as feasible with soap and water.

If staff and athletic training student incur exposure to their skin or mucous membranes, then those areas shall be washed or flushed with water as appropriated or as soon as feasible following contact.

1. **Needles**
   Contaminated needles and other contaminated sharps objects will not be bent, recapped, removed, sheared, or purposely broken. Following usage needles or other contaminated sharps objects will be disposed of in a clearly marked biohazardous, sharps container. OSHA allows for one exception to the rule governing the disposal of needles, if the procedure requires that the contaminated needles be recapped or removed and no alternative is feasible, and the action is required by the medical procedure. If such an action is required, then the recapping or removal of the needle must be done by the use of a mechanical device or a one handed technique. At this facility recapping or removal is only permitted while assisting the team physician in a procedure necessitating this act.

2. **Containers for Reusable Sharps**
   Contaminated sharps that are not reusable are to be placed immediately, or as soon as possible after use, into appropriated sharps containers. At this facility, the sharps containers are puncture resistant, labeled with a biohazard label, and are leak-proof. The sharps container is located on the counter where the first aid supplies are kept. There is also a sharps container located in the team physician examination room. An individual appointed by the Head Athletic Trainer has the responsibility for disposal of the sharps container when it becomes ¾ full. The container need only be checked as necessitated by its use.
3. Work Area Restrictions
In work areas where there is a reasonable likelihood of exposure to blood or other potentially infectious materials, staff and student athletic trainers are not to eat, drink, apply cosmetics or lip balm, smoke, or handle contact lenses. Food and beverages are not to be kept or placed on treatment tables, taping tables or countertops when blood or other potentially infectious materials are likely to be present. Mouth pipetting or suctioning of blood or other potentially infectious material is prohibited. All procedures will be conducted in a manner that will minimize splashing, spraying, splattering, and generation of droplets of blood or other potentially infectious materials.

4. Specimens
Specimens of blood or other potentially infectious materials, such as urine, will be placed in a container that prevents leakage during the collection, handling, processing, storage, and transport of the specimens. The container used for this purpose will be labeled or color-coded in accordance with the requirements of OSHA standards. It should be noted that this standard provides exemption for specimens from the labeling/color coding requirements of the standard, provided the facility uses Universal Precautions in the handling of all specimens and the containers are recognizable as container specimens. This exemption only applies while the specimens remain in the facility. If outside contamination of the primary container occurs, the primary container shall be placed within a secondary container that prevents leakage during the handling, processing, storage, transport, and/or shipping of the specimen.

5. Contaminated Equipment
Equipment that has become contaminated with blood or other potentially infectious materials shall be examined before servicing or shipping and shall be decontaminated as necessary unless the decontamination of the equipment is not feasible.

6. Personal Protective Equipment
All personal protective equipment used at the facility will be provided without cost to the staff and student athletic trainers. Personal protective equipment will be chosen based on the anticipated exposure to blood or other potentially infectious materials. The protective equipment will be considered appropriate only if it does not permit blood or other potentially infectious materials to pass through or reach a staff or students’ clothing, skin, eyes, mouth, or other mucous membranes under normal conditions of use and for the duration of time that the protective equipment will be used. The protective equipment necessary for the athletic training room primarily consists of vinyl gloves. These gloves will be stored on the counter in all athletic training rooms, in all the athletic training kits, the first aid shelves in the
taping tables, and in individual fanny packs used by the staff and athletic training students.

There is also other protective equipment made available to everyone at no cost to the staff, and students. They are listed below:

**Personal Protective Equipment**

- One-way Pocket masks
- Examination Gloves
- Protective eyewear
- Face shield

All personal protective equipment will be cleaned, laundered, and disposed of by the College at no cost to the staff and students. The College at no cost to the staff and students will make all repairs and replacements.

All garments that are penetrated by blood shall be removed immediately or as soon as feasible. All personal protective equipment will be removed before leaving the work area.

Gloves shall be worn where it is reasonably anticipated that staff and athletic training students will have hand contact with blood, other potentially infectious materials, non-intact skin, and mucous membranes. Gloves will be used for the following procedures:

- Applying bandages
- Applying wound closures
- Draining blisters
- Shaving calluses
- Cleaning open wounds
- Handling urine specimens
- Cleaning evaluation tables
- Cleaning spills of potentially infected materials
- Evaluating oral/dental injuries or conditions
- Applying direct pressure to open wounds
- Handling/changing wound dressings

Disposable gloves used at the facility are not to be washed or decontaminated for re-use. They are to be replaced as soon as practical when they become contaminated or as soon as feasible when or if they are torn, punctured, or when their ability to function as a barrier is compromised.

The facility will be cleaned and decontaminated daily when used by athletes. Decontamination will also take place after any blood or other potentially infectious material has been exposed in the athletic training room. Using PRECISE or DISPATCH, which are hospital grade disinfectants, will accomplish decontamination. These products are stored in or on the first aid cabinets of the training rooms.
7. Regulated Waste Disposal

All contaminated sharps shall be discarded as soon as feasible in sharps containers located in the facility. Sharps containers are located in all athletic training rooms and the physician examination room. Regulated waste other than sharps shall be placed in appropriate containers with color-coded waste bags. Such containers are located in the Athletic Training Room and Hockey Athletic Training Room. Stericyle disposes of these containers.

8. Laundry Procedures

Laundry contaminated with blood or other potentially infectious materials will be handled as little as possible. Such laundry will be placed in appropriately marked bags where it is used. This laundry will not be sorted or rinsed in the area of use. It will then be removed by the individual responsible for laundry using personal protective equipment, and washed separately in bleach. All staff that handles contaminated laundry will use personal protective equipment to prevent contact with blood or other potentially infectious materials.

B. HIV/HBV Exposure

Post-Exposure and Follow-up

When a staff member or athletic training student incurs an exposure incident, it should be reported to the Head or Assistant Athletic Trainer. The team physician, student health service or local hospital will evaluate the individual. All individuals who incur an exposure will be offered post “exposure evaluation and follow-up in accordance with OSHA standard. The follow-up will include the following:

1. Written documentation of the route of exposure and the circumstances related to the incident as soon as feasible following exposure. This is to be returned to the Head or Assistant Athletic trainer.
2. If possible, the identification of the source individual and if possible the status of the source individual. The blood of the source individual will be tested after consent is obtained for HIV/HBV infection.
3. Results of testing of the source individual will be made available to the exposed staff or student athletic trainer with the exposed individual informed about the applicable laws and regulations concerning disclosure of the identity and infection of the source individual.
4. The individual will be offered the option of having their blood collected for testing of the individuals HIV/HBV serological status. The blood sample will be preserved for up to 90 days to allow the individual to decide if the blood should be tested for HIV serological status. However, if the individual decides before that time testing will or will not be conducted then the appropriate action can be taken and the blood discarded.
5. The individual will be offered post exposure prophylaxis in accordance with the current recommendations of the U.S. Public Health Service.
6. The individual will be referred to appropriate counseling centers concerning precautions to take during the period after the exposure incident. The individual will be given information on what potential illness to be alert for and to report related experiences to appropriate personnel.

7. The Head Athletic Trainer will be designated to assure that the policy outlined above is effectively carried out as well as to maintain records related to this policy.

C. Training

Training for all staff and student athletic trainers will be conducted before initial assignment to tasks where occupational exposure may occur. Training for staff and students will include the following:

1. The OSHA Standard for Bloodborne Pathogens.
2. Epidemiology and symptomatology of bloodborne disease.
3. Modes of transmission of bloodborne pathogens.
4. The exposure plan (i.e. points of the plan, lines of responsibility, how the plan will be implemented, etc.)
5. Procedures that might cause exposure to blood or other potentially infectious material at this facility.
6. Control methods to be used at the facility to control exposure to blood or other potentially infectious materials.
7. Personal protective equipment available at this facility.
8. Who should be contacted concerning exposure to blood or other potentially infectious material?
10. Signs and labels used at the facility.
11. Hepatitis B vaccine program at the College.

D. Record Keeping

The Head Athletic Trainer will maintain all records required by the OSHA standard. The athletic training staff will be responsible for conducting the training to the student athletic trainers during preseason orientation. All staff and students will receive annual refresher training within one year of the individual’s previous training. The OSHA Standard for Bloodborne Pathogens and the outline for the training material will be kept in the office of the Head Athletic Trainer and in the policies and procedure manual.