

Bloodborne Pathogens Compliance

Information for Principals

Pathogens are pathogenic micro-organisms that are present in human blood and can cause bloodborne diseases such as HIV/AIDS, Hepatitis B (HBV) and Hepatitis C (HCV), Syphilis and Malaria.

Bloodborne pathogens are spread when infected blood or other body fluids contaminated with blood gets into the bloodstream of an uninfected person. Examples include: bites, cuts or openings into the skin, puncture wounds from sharp objects, providing first aid and splashes of contaminated fluids into the eyes, nose or mouth.

The Bloodborne Pathogens Standard: 29 CFR 1910.1030

PURPOSE: To prevent the transmission of bloodborne pathogen diseases within potentially exposed workplace occupations.

LAW IN EFFECT: This law has been in effect since 1992.

WHO IS COVERED: All NYCDOE employees whose job tasks bring them into routine contact with blood and other potentially infectious materials.

WHAT IS REQUIRED: The NYCDOE is required to develop a written Exposure Control Plan; identify employees who are at risk; ensure that universal precautions are practiced; provide disposable gloves and other personal protective equipment; provide prompt evaluation and treatment to workers who have a needle stick or other exposure to blood; provide Hepatitis B vaccinations to workers who are at-risk; train at-risk employees each year on bloodborne diseases, and adequately dispose of medical waste.

WHO IS RESPONSIBLE: Principals must ensure that their schools comply with this regulation. The Site Employee Safety Administrator (SESA) is key to school compliance. This person functions on behalf of the principal to ensure that the school is compliant.

WHO ENFORCES THE LAW: The New York State Department of Labor, Public Employee Safety and Health Bureau (PESH). Penalties may be levied on sites found not compliant.

NYS regulations require that each school implement protocols to protect employees who are at risk of occupational exposure to blood and other potentially infectious materials.

Compliance dates are communicated via Principal's Weekly and schools are held accountable for these tasks through two questions on the Annual Compliance Check list.

SESA Tasks & Responsibilities

- 1. APPOINT A SITE SAFETY ADMINISTRATOR (SESA)** You must designate a SESA to be the school's point-of contact for all BBP-related tasks and communications. The ideal SESA (e.g. Dean, AP) knows the responsibilities of each staff member at your school and can identify which employees have roles that put them at risk for BBP exposure. The SESA should also have administrative authority, school leader-level network access and be accessible during work hours. SESA selection is done in GALAXY. You may elect up to 2 SESAs. After selection, your SESA(s) will receive a notification email. *Compliance item.*
- 2. CONDUCT EMPLOYEE EXPOSURE DETERMINATION** Your SESA will be asked to use the BBP Compliance Tool (BBPCT) to identify staff members at-risk of BBP exposure. If a staff member was previously identified as at-risk, the SESA should review to ensure the employee responsibilities remain the same. For more information, refer to *A SESA's Guide to Employee Exposure Determination* in the Resource section of the BBPCT. *Compliance item.*
- 3. TRAIN HIGH RISK EMPLOYEES** Once your SESA has confirmed your at-risk employees, they will receive a notification email with a link for web-based training. Employees will need access to a computer and they must be released to take the 1-hour training session during the work day. Employees' records will be credited the next day. If schools conduct group training, then SESAs must then update the training status of employees in BBPCT. *Compliance item.*
- 4. COMPLETE THE EXPOSURE CONTROL PLAN (ECP)** This plan explains how the NYCDOE will comply with State regulations. The plan is made specific to your school, when your SESA completes the prompts provided by BBPCT. The plan identifies the locations of the written plan, personal protective equipment, Sharps Injury Log and medical waste kits. Completed ECPs must be posted on your Health and Safety Bulletin Board. *Compliance item.*
- 5. DEVELOP A CLEANING SCHEDULES** The cleaning schedule outlines when and how the Medical and Change Rooms (areas for diapering) will be cleaned and maintained. In consultation with the School Custodian, BBPCT will help your SESA develop a school-specific cleaning schedule. Safety Data Sheets (SDS) for the cleaning solutions listed must be available to employees. Last year's Cleaning Schedule, will need to be reviewed to ensure all designations remain applicable for the coming school year. *Compliance item.*
- 6. PROVIDE HEPATITIS B VACCINATIONS** After training, eligible (completed the training and never received the vaccination) employees will be emailed a vaccine offer which they must accept or decline. In BBPCT, you can view which employees have not complied. The 3-part vaccination series will be scheduled by the Office of Occupational Safety and Health (OOSH) at a neighboring school site and you will be notified. Those wishing to discontinue the vaccination series or change their decisions must contact OOSH as early as possible.
- 7. PROVIDE PERSONAL PROTECTIVE EQUIPMENT (PPE)** Schools must purchase and provide disposable gloves and other protective equipment to employees at no cost. PPE must be specific to

the task being performed. Please ensure that an adequate supply of PPE in varying sizes is available. The NYCDOE is a latex free agency.

8. **POST EXPOSURE FOLLOW-UP** Employees who have been exposed to blood, OPIM, or needle sticks must be offered the opportunity to receive medical attention free of charge and they must be released to do so. Medical evaluation and follow-up can be received at a Health and Hospitals Corporation (HHC) facility at no cost. Employees will be reimbursed for unpaid medical expenses if they choose to see a private physician. For each exposure incident, an Exposure Incident Package or a Sharps Injury Package must be completed and recorded in BBPCT. The SH900 Log must also be updated. Refer to the Resource section of BBPCT, *Post Exposure Incident Information Sheet* for more information.
9. **RECORDKEEPING** Medical records must be kept on site for the length of employment plus 40 years and training records for 3 years. The BBPCT keeps records of employee training and vaccination, vaccine acceptance and declination, all email notifications as well as non-responsive employees. Records must be made available to representatives from PESH and the employee representative with the employee's consent.
10. **POSTINGS** The Exposure Control Plan, the Standard Universal Precautions and Protect Yourself posters must be posted on the school's Health and Safety Bulletin Board (*See the Resources Section in BBPCT*). The Cleaning Schedule should be posted in the named room (s).

The Bloodborne Pathogens Compliance Tool (BBPCT)

The BBPCT is an interactive database which tracks the school's compliance status with the Bloodborne Pathogens Standard. Principals and SESAs can perform employee exposure determination, track the training and vaccination status of at-risk employees.

BBPCT will generate automatic email notification to employees and keep the required records. Schools can customize their Cleaning schedules and Site Specific Plans, and record exposure incidents. Principals and SESAs can instantly see the status of at-risk employees and the school compliance status. The Resource Section contains informational brochures and posters.

With a School Leader-level network access, Principals and SESAs can log on to BBPCT at: <http://nycboe.net/applications/bbp>

To log in, type: Central\Your outlook ID), then your (Outlook Password) at the log-in prompt or pop-up.

Help

- Technology Help Desk: 718-935-5100
- GALAXY Help: 718-935-4444
- Group Training: (718) 935-2895
- OOSH: 718-935-2895
- Email: BBPquestions@schools.nyc.gov

*Office of Occupational
Safety and Health*

2016