The below is an adaptation of OSHA’s model Bloodborne Pathogen Exposure Control plan.

Lake Highland Preparatory School is committed to providing a safe and healthful work environment for all our employees. In pursuit of this goal, the following exposure control plan (ECP) 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 ECP is a key document to assist Lake Highland Preparatory School 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 and employees and training
- Recordkeeping
- Procedures for evaluating circumstances surrounding exposure incident

The Security, Safety, and Transportation Manager is responsible for implementation of the ECP. The Security, Safety, and Transportation Manager will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. The Security, Safety, and Transportation Manager may be reached by phone at (407) 206-1900 x4400 or (321) 436-3166.

The Security Department will maintain all necessary personal protective equipment (PPE), engineering controls (ie sharps containers), labels, and red bags as required by the standard. The Security Department will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes. The Security, Safety, and Transportation Manager may be reached by phone at (407) 206-1900 x4400 or (321) 436-3166.
The Human Resources Department will be responsible for ensuring that all medical actions required by the standard are performed and that appropriate employee health and OSHA records are maintained. The contact for this information is Maria Galvan located in the Annex Building and may be reached by phone at (407) 206-1900 x4432.

The Security Department will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives. The Security, Safety, & Transportation Manager may be reached by phone at (407) 206-1900 x4400 or (321) 436-3166.

**EMPLOYEE EXPOSURE DETERMINATION**

The following is a list of all job classifications at our school in which all employees have occupational exposure:

<table>
<thead>
<tr>
<th>Job Title</th>
<th>Department</th>
<th>Task/Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registered Nurse</td>
<td>Clinic</td>
<td>Medical Care</td>
</tr>
<tr>
<td>Clinic Assistant</td>
<td>Clinic</td>
<td>Medical Care</td>
</tr>
<tr>
<td>Maintenance Tech</td>
<td>Maintenance</td>
<td>Maintenance</td>
</tr>
<tr>
<td>Porter</td>
<td>Maintenance</td>
<td>Maintenance</td>
</tr>
<tr>
<td>Security</td>
<td>Security</td>
<td>First Aid</td>
</tr>
<tr>
<td>Athletic Trainer</td>
<td>Athletics</td>
<td>Medical Care</td>
</tr>
<tr>
<td>Bus Operator</td>
<td>Transportation</td>
<td>First Aid/Vehicle Clean-up</td>
</tr>
</tbody>
</table>

Contract Cleaning staff are employed by Lake Highland Preparatory School. The Contract Cleaning staff will be trained and supplied by their employer.

**METHODS OF IMPLEMENTATION AND CONTROL**

Universal Precautions

All employees will utilize universal precautions.

Exposure Control Plan

Employees covered by the bloodborne pathogens standard receive an explanation of this ECP during their initial training session. It will also be reviewed in their annual refresher training. All Employees can review this plan anytime during their work hours by contacting the Security, Safety, & Transportation Manager. If requested, we will provide an employee with a copy of the ECP free of charge and within 15 days of the request.
The Security, Safety, and Transportation Manager is responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect any new or modified tasks and procedures that affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

Personal Protective Equipment

PPE is provided to our employees at no cost to them. Training in the use of PPE for specific tasks or procedures is provided by Security and/or Maintenance Department.

The types of PPE available to employees are follows:
- Protective gloves
- Eye shields
- CPR shields
- Apron
- Dust masks
- Body fluid clean-up kits

PPE is located in first aid kits, porter cleaning carts/closets, maintenance office, clinic, and the security office.

All Employees using PPE must observe the following precautions:
- Wash hands immediately or as soon as feasible after removing gloves or other PPE.
- Remove PPE after it becomes contaminated and before leaving the work area.
- Used PPE may be disposed of in the Bradshaw Clinic or Charles Clayton Campus Clinic.
- Wear appropriate gloves when it is reasonably anticipated that there may be hand contact with blood or OPIM, and when handling or touching contaminated surfaces; replace gloves if torn, punctured or contaminated, or if their ability to function as a barrier is compromised.
- Utility gloves may be decontaminated for reuse if their integrity is not compromised; discard utility gloves if they show signs of crackling, peeling, tearing, puncturing, or deterioration.
- Never wash or decontaminate disposable gloves for reuse.
- 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.
- 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.
  The procedure for handling used PPE is as follows:
- Decontaminate in the Guernsey Building Chiller Room. Dispose of contaminated items in Bio-Hazardous containers located in the clinic.
Housekeeping

Regulated waste is placed in containers which are able to be sealed and constructed to prevent leakage, appropriately labeled or colored and closed prior to removal to prevent spillage or protrusion of contents during handling.

The procedure for handling sharps disposal containers is School Nurse, who may be contacted at (407) 206-1900 x1178.

The procedure for other regulated waste is the Security, Safety, & Transportation Manager who may be contacted at (407) 206-1900 x4400.

Contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture resistant, leak proof sides and bottoms, and appropriately labeled or color coded. Sharps disposal containers are available at the Main Campus Clinic or the Charles Clayton Campus Clinic.

Bins and pails are cleaned and decontaminated as soon as feasible after visible contamination.

Broken glassware that may be contaminated is only picked up using mechanical means, such as a brush or dust pan.

Labels

The following labeling methods are used in this facility:

- Containment bags: Red bag, Biohazard label
- Sharps Container: Red container, Biohazard label

Security, Safety, & Transportation Manager 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 the facility. Employees are to notify the Security, Safety, & Transportation Manager if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc… without proper labels.
Hepatitis B Vaccination

The School Clinic will provide training to employees on hepatitis B vaccinations, addressing safety, benefits, efficacy, methods of administration, and availability.

The hepatitis B vaccination series is available at no cost after initial employee training and within 10 days of initial assignment to all employees indentified in the exposure determination section of this plan. Vaccination is encouraged unless: 1.) documentation exists that the employee has previously received the series 2.) antibody testing reveals that the employee is immune. 3.) medical evaluation shows that vaccination is contraindicated.

However, if an employee declines the vaccination, the employee must sign a declination form. Employees who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal is kept at Human Resources located at 940 Highland Avenue Orlando, FL 32803.

Vaccination will be provided by the School Clinic located in the Bradshaw Building.

Following the medical evaluation, a copy of the health care professional’s written opinion will be obtained and provided to the employee within 15 days of completion of the evaluation. It will be limited to whether the employee requires the hepatitis vaccine and whether the vaccine was administered.

Post-Exposure Evaluation and Follow-Up

Should an exposure incident occur, contact Human Resources at (407) 206-1900 x4432.

An immediate available confidential medical evalution and follow-up will be conducted by Centra-Care. Following initial first aid the following activities will be performed:
- Document the routes of exposure and how the exposure occurred.
- Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).
- Obtain consent and make arrangements to have the source individual tests as soon as possible to determine HIV, HCV, and HBV infectivity; document that the source individual’s test results were conveyed to the employees’ health care provider.
- If the source individual is already known to be HIV, HCV, and/or HBV positive, new testing need not be performed.
- Assure that the exposed employee is provided with the source individual’s test results and with information about applicable disclosure laws and regulations
concerning identity and infectious status of the source individual (e.g. laws protecting confidentiality)
- After obtaining consent, collect exposed employee’s blood as soon as feasible after exposure incident, and test blood for HBV and HIV serological status.
- If the employee 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.

Administration of Post-Exposure Evaluation and Follow-up

The Human Resources Department ensures that health care professional(s) responsible for employee’s hepatitis B vaccination and post-exposure evaluation and follow-up are given a copy of OSHA’s bloodborne pathogens standard.

The Human Resources Department ensures that the health care professional evaluating an employee after an exposure incident receives the following:

- a description of the employee’s job duties relevant to the exposure incident.
- Route(s) of exposure
- Circumstances of exposure
- If possible, results of the source individual’s blood test
- Relevant employee medical records, including vaccination status

The Human Resources Department provides the employee with a copy of the evaluating health care professional’s written opinion within 15 days after the completion of the evaluation.

The Safety Committee will review the circumstances of all exposure incidents to determine:

- Engineering controls in use at the time.
- Work practices followed
- A description of the device being used (including type and brand)
- Protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc)
- Location of the incident
- Procedure being performed when the incident occurred
- Employee’s training

Human Resources will record all percutaneous injuries from contaminated sharps in a Sharp’s Injury Log.
If revisions to this ECP are necessary the Security, Safety, & Transportation Manager will ensure that appropriate changes are made.

Employee Training

All employees who have occupational exposure to bloodborne pathogens receive initial and annual training conducted by the Security, Safety, & Transportation Manager, who is a certified American Health & Safety Institute trainer.

All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. The training program shall adhere to nationally recognized standards.

Bloodborne Pathogens training records shall be kept for each employee with occupational exposure in the Human Resources Department for at least three years.

The training records shall include:
- the dates of 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.

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