

Infectious, Environmental Hazards, and Universal Precautions Policy and Procedures A3.08

For More Information:

[Bloodborne Pathogens](#)

[HIV, HBV and HCV](#)

PURPOSE OF THE POLICY

One of the major goals of the Occupational Safety and Health Administration (OSHA) is to regulate facilities where work is carried out to promote safe work practices in an effort to minimize the incidence of illness and injury experienced by employees and students. Relative to this goal, OSHA has enacted the Bloodborne Pathogens Standard, codified as [29 CFR 1910.1030](#). The purpose of the Bloodborne Pathogens Standard is to "reduce occupational exposure to Hepatitis B Virus (HBV), Human Immunodeficiency Virus (HIV), Hepatitis C (HCV), and other bloodborne pathogens that employees may encounter in the workplace."

The University believes that there are a number of good general principles that should be followed when working with bloodborne pathogens. These include:

- That it is prudent to minimize all exposure to bloodborne pathogens.
- The risk of exposure to bloodborne pathogens should never be underestimated.
- Our facility should institute as many engineering and work practice controls as possible to eliminate or minimize employee exposure to bloodborne pathogens.

An Exposure Control Plan has been implemented to meet the letter and intent of the OSHA Bloodborne Pathogens Standard. The objective of this plan is twofold:

- To protect our employees and students from the health hazards associated with bloodborne pathogens.
- To provide appropriate treatment and counseling should an employee or student be exposed to bloodborne pathogens.

Bloodborne Pathogen Training

In any situation involving possible exposure to blood or potentially infectious materials, students should always practice Universal Precautions and try to minimize exposure by wearing protective barrier devices (i.e., gloves, splash goggles/face shields, gowns, pocket mouth-to-mouth resuscitation masks, etc.).

All students will need to complete online video training on Bloodborne Pathogen Exposure prior to starting any educational activities, which can be accessed at the following site:

<https://www.redcross.org/take-a-class/classes/bloodborne-pathogens-training-online/05447631.html>

Students are required to pay for this training which is included in their mandatory student fees and is non-refundable.

Methods of Prevention: Universal Precaution A3.08a

Students are responsible for following OSHA Guidelines for universal precautions at clinical rotation sites, including the use of protective gloves, eyewear, and clothing, the proper use and disposal of sharps, regular handwashing/hand sanitation, PPE use, and other precautionary measures. These guidelines will be presented in the Surgery and PA Professional Issues didactic modules and pre-clinical orientation activities prior to starting clinical rotations.

Any documented allergies to latex products should be reported to the preceptor and the Director of Clinical Education. Each student is responsible to supply any latex-free products they may need, if they are not otherwise available at a given clinical site.

Universal Precautions Guidelines:

1. Avoid direct contact with blood, body fluids, secretions, excretions, mucous membranes, non-intact skin, and lesions
2. Avoid injuries from all “sharps”
3. Avoid direct contact with items, objects, and surfaces contaminated with blood, body fluids, secretions, and excretions
4. Dispose of all “sharps” promptly in special puncture-resistant containers
5. Dispose of all contaminated articles and materials in a safe manner, as prescribed by law

In practice, using Universal Precautions also requires:

- Students wash their hands immediately, or as soon as feasible, after removal of gloves or other personal protective equipment.
- Following any contact of body areas with blood or any other potentially infectious material, students wash their hands and any other exposed skin with soap and water as soon as possible. Students are to also flush any exposed mucous membranes with water.
- Depending on job duties and risk of exposure, use appropriate barriers, which may include gloves, gowns, aprons, hair covers, caps, shoe covers, hoods, lab/white coats, masks, goggles/safety glasses, N95 masks, and/or face shields
- Contaminated needles and other contaminated sharps are not to be bent, recapped, or removed. Recapping may only be done if:
 - It can be demonstrated that there is no feasible alternative.
 - The action is required by a specific medical or research procedure.
 - In the two situations above, the recapping or needle removal is accomplished using a mechanical device or is already designed with a one-handed safety device.
- Contaminated sharps are placed in appropriate containers immediately, or as soon as possible after use. Containers must be disposed of when approximately 3/4 full or earlier.
- Eating, drinking, smoking, applying cosmetics or lip balm and handling contact lenses are prohibited in areas where there is potential for exposure to bloodborne pathogens.
- Mouth Pipetting/suctioning of blood or other infectious materials is prohibited.

- All procedures involving blood or other infectious materials will be conducted in a manner that will minimize splashing, spraying, or splattering and generation of droplets of these materials.
- Specimens of blood or other materials are placed in designated leak-proof containers, appropriately labeled, for handling and storage.
- If outside contamination of a primary specimen container occurs, that container is placed within a second leak-proof container, appropriately labeled, for handling and storage. (If the specimen can puncture the primary container, the secondary container must be puncture resistant as well).

Personal Protective Equipment (PPE)

- PPE including gloves, are to be removed after each use and PROPERLY disposed of.
- Gloves and other PPE are NOT to be worn from one patient or activity to another.
- Reusable personal protective equipment (including white coats) is to be cleaned regularly and decontaminated as needed at the student's expense.
- Single use contaminated personal protective equipment (or equipment that cannot, for whatever reason, be decontaminated) should be disposed as biohazardous waste. Any garments penetrated by blood or other infectious materials are removed immediately, or as soon as feasible.
- All personal protective equipment is removed prior to leaving the patient room or clinical area.
- Gloves should be worn in the following circumstances:
 - Whenever students anticipate hand contact with potentially infectious materials, fluids, and/or upon instruction by instructional faculty or preceptors.
 - When performing vascular access procedures.
 - When handling or touching contaminated items or surfaces.
 - Examining a patient on any type of contact precautions
 - At the student's discretion
- Disposable gloves are replaced as soon as practical after contamination or if they are torn, punctured, or otherwise lose their ability to function as an exposure barrier.
- Masks and eye protection (such as goggles, face shields, etc.) are used whenever splashes or sprays may generate droplets of infectious material.
- NOTE: Current COVID-19 protection guidelines: Clinical year students should wear a N95 mask for all patients with confirmed or suspected COVID-19 and/or for any other patient placed on airborne precautions (TB, measles, etc.). Didactic and clinical students should wear a mask when feeling unwell.
- Protective clothing (such as lab coats, gowns and/or aprons) is to be worn whenever potential exposure to the body is anticipated.

Needlestick and Bloodborne Pathogen Exposure Procedure A3.08b

<https://som.rowan.edu/documents/needlesticks-and-bloodborne-pathogens-exposure-policy-5.23.2023.pdf>

The Needlestick and Bloodborne Pathogen Exposure Policy and Procedure is instituted to ensure appropriate action is taken to prevent, prepare, and protect SOM students from needlesticks and bloodborne pathogens exposure and provide protocols to follow in the event of these exposures.

All SOM students receive and must complete trainings on infectious hazard methods of prevention and safety, including protocols surrounding access to care and treatment after exposure. The protocols included in this policy must be followed whenever there is the potential for exposure. Students are expected to comply with recommended infection prevention precautions and procedures at the point of patient care at each clinical site.

PROCEDURE:


1. Each student is responsible for their own safety throughout their education at SOM.
 - a. SOM will provide students with education and information regarding appropriate policies and procedures to follow to protect themselves during their educational experience and when they are potentially exposed to blood-borne pathogens and communicable diseases. SOM students are expected to comply with all infection prevention policies and procedures.
2. Education and Training
 - a. All students receive training surrounding infection prevention and procedures to follow in the event of an exposure.
 - b. During first-year orientation, all students receive training and education regarding needle sticks, sharps, and body fluid procedures and the prevention of blood-borne pathogen transmission.
 - c. Prior to their first clinical experience, students receive online and in-person instruction regarding the prevention and understanding of all infectious diseases they may encounter in a clinical setting.
 - d. An exposure checklist (laminated card) detailing the steps to follow in the event of an exposure is provided to all SOM students.
3. Standard Precautions
 - a. Consider blood, body fluids and tissue from ALL PATIENTS to be potentially infectious.
 - b. Perform hand hygiene before/after all patient contacts.
 - c. Wear gloves when exposure to blood and body fluids may occur, e.g., during phlebotomy. Change your gloves and perform hand hygiene after each procedure and before contact with another patient.
 - d. Wear a gown, mask and goggles when blood or body fluids splashes may occur (e.g. during surgery, placing nasogastric tubes, etc.).
 - e. Report immediately all incidents of blood and body fluid exposure of the following types:
 - f. Parenteral: needle stick, puncture or cut.
 - g. Mucous membrane: splash to eyes, nose, mouth.
 - h. Cutaneous: contact with blood and body fluids on ungloved hands or other skin surfaces that may be cut, chapped, abraded, or affected by active dermatitis.
4. Immediate Response-Time Matters!
 - a. Clean wounds or punctures with soap and water.
 - b. Flush mucous membranes or skin copiously with water or saline.

- c. DO NOT “force bleed” the wound.
 - d. DO NOT apply caustics (e.g. bleach, organic solvents, hard surface disinfectants, etc.).
 - e. Notify the resident, attending physician, and/or the nursing supervisor who should request source-person clinical information and blood work (e.g. HBsAG, HCV, antibody, HIV) unless HIV, HBV & HCV status is known.
 - f. When HIV post-exposure prophylaxis (PEP) is indicated, early treatment (within hours) is recommended.
 - g. If you are not on or near Rowan-Virtua SOM Stratford campus, go to the nearest emergency department for evaluation or call 866-HIV-CHEC for advice and locate the nearest emergency center.
 - h. If you are on or near the Stratford campus, immediately contact the Department of Medicine - Division of Infectious Diseases, Rowan-Virtua Medicine Building, Stratford Campus at 856-566-7070 (press 6). Identify yourself as a SOM student with a potential bloodborne exposure and request an urgent appointment or further instructions.
 - i. Save copies of incident reports and ER visit for follow up incident documentation
5. Follow Up Incident Documentation
- a. Complete the online [Rowan incident report](#), and email it to PAClerkships@rowan.edu. It is your responsibility to obtain copies of your incident report from the hospital/facility, and return your completed Rowan-Virtua SOM incident report.
 - b. Carefully note the type of exposure, type of fluid/tissue involved and appropriate information about the source patient. (risk factors, lab data)
 - c. Submit all claims to your health insurance company. Please note, this is not a worker compensation claim.
 - d. Send outstanding bills and a copy of your Explanation of Benefits to PAClerkships@rowan.edu.
 - e. The Office of the Dean at SOM will reimburse any residual expenses for acute exposure or injury not covered by the medical student’s health or disability insurance. The student will not be responsible for costs incurred as part of the treatment of an acute occupational exposure or injury.
6. Learning Environment
- a. If a student has infection with a blood borne pathogen, they are required to confidentially discuss the matter with the Director of Student Health Services. The goals are to protect infected students from discrimination, protect student confidentiality, and protect patients during exposure prone procedures. The director will assess risk to patients, educate the student about their condition, review practices, and provide clinical care if the student does not want care from their own physician.
 - b. In order to allow a student to return to the clinical setting following contraction of a communicable disease or disability due to an exposure, the Director of Student Health Services will make a recommendation based on the safety of all involved. If the disease or disability of the student can be accommodated, the student should contact Academic Affairs to request appropriate accommodations. If approved,

the accommodations would be reviewed and implemented. All information will be strictly confidential.

- c. SOM is dedicated to ensuring that students with chronic conditions are not discriminated against and can continue in the educational program, despite the presence of a chronic condition, if at all possible, with or without accommodation.

All students are given the below card and should keep this on them alongside their ID badges.



ROWAN-VIRTUA
School of
Osteopathic Medicine

NEEDLESTICK/BLOODBORNE PATHOGEN EXPOSURE GUIDELINES

Time is crucial! Act as follows:

- Wash exposure site thoroughly with soap and water.
- Notify the resident, rotation supervisor, or the nursing supervisor who should request source-person clinical information and blood work (e.g., HBsAG, HCV, antibody, HIV) unless HIV, HBV & HCV status is known.

On campus/Near Rowan-Virtua SOM/During business hours:
Immediately contact the SOM Department of Medicine – Division of Infectious Diseases, Rowan Medicine building, Stratford Campus at 856-566-7070 (press 6). Identify yourself as a SOM student with a potential bloodborne exposure and request an urgent appointment or further instructions.

Off campus/After business hours:
Go immediately to the nearest emergency department for evaluation or call 866-HIV-CHEC for advice and to locate the nearest emergency center.

Front of Needlestick/Bloodborne Pathogen Exposure Card

Exposure Guidelines	<ul style="list-style-type: none"> • Receive appropriate tests, e.g., for HIV, HBV panel, HCV BUN, creatinine, U/A, LFTs, amylase, CBC with diff & pit, electrolytes, glucose, and urine pregnancy test, when appropriate. • Receive risk-assessment counseling and chemoprophylaxis (if needed). If elected, chemoprophylaxis should begin as soon as possible after exposure, best within hours of exposure. • All exposures MUST be reported within 24-hours. Complete an Incident report form at the incident site as well as with Rowan-Virtua SOM. Scan the QR code to begin.
Submitting Claims	<ul style="list-style-type: none"> • Submit all claims to your health insurance company. Please note, this is NOT a workers compensation claim. • Email Incident report, bills, receipts, and the explanation of benefits for each visit to PAClerkships@rowan.edu. • Copies of incident reports from the hospital/facility and Rowan-Virtua SOM are required to process these payments



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Back of Needlestick/exposure card.

Financial Responsibility for Infectious or Environmental Exposures A3.08c

The Office of the Dean at SOM will reimburse any residual expenses for acute exposure or injury not covered by the medical student's health or disability insurance. The student will not be responsible for costs incurred as part of the treatment of an acute occupational exposure or injury.

Students are required to obtain and maintain adequate personal health insurance throughout their enrollment in the PA Program. Students are responsible for using their own personal health insurance to pay for any medical visits (including, but not limited to, risk evaluation; screenings; testing; and treatment) associated with the exposure or needlestick incident. Students are responsible for copayments, deductibles, coinsurances, or any other uncompensated healthcare costs.

1. All exposures MUST be reported. Complete an incident report at the site of the injury along with [Rowan-Virtua SOM](#).
2. Submit all claims to your health insurance company. Please note, this is NOT a workers compensation claim.
3. Email the incident report form, bills, receipts, and the explanation of benefits for each visit to PAClerkships@rowan.edu
4. Copies of incident reports from the hospital/facility and Rowan-Virtua SOM are required to process these claims.