I. INTRODUCTION

As its name suggests, a "bloodborne pathogen" is any disease-causing microorganism or virus that can be transmitted from one individual to another through blood or through other bodily fluids containing blood. The two bloodborne pathogens causing greatest concern today are the HIV virus, which causes AIDS, and the HBV virus, which causes hepatitis B. Of these two, the one most likely to be encountered in a school setting is HBV.¹

In 1992, the Occupational Safety and Health Administration ("OSHA") issued a binding set of regulations which attempts to control an employee's exposure to bloodborne pathogens in the workplace. These regulations, which went into effect nationwide on March 6, 1992, are contained in OSHA's "Final Rule for Occupational Exposure to Bloodborne Pathogens" (the "Rule").

OSHA's authority to enact these regulations extends to all private sector employers with one or more employees. Accordingly, churches and Christian schools must comply with applicable OSHA guidelines, including the Rule for Occupational Exposure to Bloodborne Pathogens.

The Rule has been in effect for almost three years, and all schools (including Christian schools) need to be in compliance as soon as possible. This Memorandum will discuss certain provisions of the Rule and will provide information on obtaining valuable training kits that can assist your member schools in satisfying the requirements of the Rule.

¹ The HBV virus is 100 times more contagious than the HIV virus, and HBV can live up to seven days on air-exposed surfaces such as dried blood. In contrast, the HIV virus dies within hours of exposure to air.
II. DISCUSSION

A. Who is covered under the Rule?

The Rule applies to all persons in any school who may be "occupationally exposed" to blood or to "other potentially infectious materials." A person is "occupationally exposed" to a potentially infectious material if it can reasonably be anticipated that the person will have contact with blood or other bodily fluids containing blood during the performance of his or her duties.

This broad definition of "occupational exposure" appears to cover most, if not all, of the faculty and staff members in a particular school. Although the vast majority of employees will be covered, the Rule requires a school to review all job classifications and divide these classifications into groups based on the degree of potential exposure. In most situations, the job classifications in a school can be divided as follows:

### Group One

<table>
<thead>
<tr>
<th>Definition</th>
<th>Who is included</th>
<th>Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>All employees (or job classifications) responsible for rendering first aid or medical assistance as part of their primary job duties</td>
<td>School nurses, coaches, physical education instructors, or any staff member (including, for example, a school secretary), responsible for treating injuries</td>
<td>Must complete an annual inservice training course; this group also must be offered a pre-exposure hepatitis B vaccine series</td>
</tr>
</tbody>
</table>

### Group Two

<table>
<thead>
<tr>
<th>Definition</th>
<th>Who is included</th>
<th>Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>All employees who administer first aid as a collateral duty to their routine work assignments</td>
<td>Almost all school employees not listed in Group One, including all classroom teachers and aides, administrators, custodians, food service assistance in a situation involving potentially infectious materials</td>
<td>Must complete an annual inservice training course; a post-exposure vaccine must be made available to any Group Two employee who has rendered assistance in a situation involving potentially infectious materials</td>
</tr>
</tbody>
</table>

2 "Other potentially infectious materials" include any bodily fluids visibly contaminated with blood, or any bodily fluids that may contain blood, even though blood is not readily visible.

3 The main difference between Group One and Group Two employees is found in the vaccination requirements. Although a school is not required to offer a pre-exposure hepatitis B vaccine series to Group Two employees (as is required for Group One employees), the school must make a post-exposure vaccine available to any Group Two employee who has rendered assistance in a...
situation involving the presence of blood or other potentially infectious material. This vaccine should be made available within 24 hours of exposure.

A hepatitis B vaccine series can cost as much as $150.00 per person. For that reason, we recommend that a school specifically list those employees who are "designated first aid providers," and therefore, would be placed in Group One. Presumably, this will reduce the number of employees who render first aid as a part of their primary job duties, and therefore, would reduce the number of employees who must be offered a pre-exposure vaccine series.
Group Three

Definition

Individuals who would never have occasion to administer first aid

Who is included

Few, if any, employees; Not required to complete an exposure vaccine; a post-exposure similar employee in an office adjacent to the main office

Requirements

Not required to complete an exposure vaccine available to any Group Three employee who has rendered assistance in a situation involving a potentially infectious materials

B. What does the Rule require?

Listed below are some of the important requirements of the Rule. Please note, however, that neither an exhaustive listing of all the requirements of the Rule, nor an in-depth discussion concerning the implementation of the important requirements of the Rule, can be covered in this Memorandum. Accordingly, you should encourage your member schools to purchase one of the training kits listed in Section C of this Memorandum to ensure that they are in complete compliance with the Rule.

1. Exposure Control Plan

The Rule requires employers to develop a written Exposure Control Plan. At a minimum, the Plan must include the following: (1) the exposure determination for each job classification (discussed above); (2) the procedures for handling an exposure incident; and (3) the schedule and methods for implementing certain requirements set forth in the Rule, including those requirements that relate to first-aid reporting, vaccinations, inservice training, and record-keeping.

2. Inservice Training

Each employee in Group One and Group Two must be given an annual inservice training course. This course must be provided during regular working hours at no cost to the employee. The training kits
listed in Section C below can provide information on the subject areas that must be covered in the training course. You may consider offering this training course at a State convention.

3. Vaccinations

As noted above, a pre-exposure hepatitis B vaccine series must be offered to all Group One employees, and a post-exposure vaccine series must be offered to any other employee who has rendered assistance in a situation involving blood or other potentially infectious material. The vaccine series, as well as all medical evaluations and follow-ups, must be made available at no cost to the employee, must be provided at a reasonable time and place, and must be performed by or under the supervision of a licensed physician. Any employee who declines the vaccine series must sign a declination form.

4. Record Keeping

The school must preserve and maintain various medical records and other forms in accordance with the Rule. The training kits listed below should contain the necessary forms and should explain the guidelines for maintaining the forms. For example, certain records concerning the inservice training programs must be kept for three years, and certain medical records and reports must be maintained by the school for the duration of an individual's employment plus thirty years.

5. Engineering and Work Practice Controls

Engineering and work practice controls are the primary methods used to prevent the transmission of HBV and HIV. The training kits listed below will provide information on all of the work practice controls that must be followed, but some examples are as follows:

- Treat all bodily fluids as though they are infectious; because of certain confidentiality requirements, you may not know if a fellow employee or a student has an infectious disease such as hepatitis B
- Use a plastic resuscitation device for CPR to avoid mouth-to-mouth contact
- Wear latex gloves when handling or touching contaminated items or surfaces, and wash hands thoroughly with soap and running water when finished
• Clean surfaces that have blood (or other potentially infectious materials that may contain blood) with an EPA-approved disinfectant or with a 1:10 solution of liquid household bleach and water

• Dispose of contaminated latex gloves and other contaminated materials in plastic-lined waste containers

• Carefully dispose of trash that contains sharp objects in containers that cannot be broken or penetrated by sharp objects

• Avoid punctures with objects that may contain blood from others; for example, do not pick up broken glass with bare hands; instead, use a dustpan and brush

• Report all "exposure incidents" to the administrator of the school and ensure that the administrator documents the incident on the appropriate forms

• Use biohazard and medical waste labels and procedures when required

• Make infectious disease kits available for each employee

C. Where can you obtain information and training kits that will assist you in complying with the Rule?

Rev. Reece Yandle
South Carolina Association of Christian Schools
P.O. Box 899
Ladson, SC 29456
Call: (803) 851-6921
FAX: (803) 851-6921
Includes: 40-page manual explaining the necessary steps to compliance.
Cost: $39.00

SafetyLine
124 Washington Ave., #B-2
Point Richmond, CA 94801
Call: 1-800-994-SAFE
FAX: (510) 236-1978
Includes: 3-ring binder containing an Exposure Control Policy, all record keeping forms, "JumpStart" card, and staff inservice training materials. A 27-minute training video can be purchased at an additional cost of $16.00.

An infectious disease kit can be made by filling a Zip-Loc bag with a pair of disposable latex gloves, a disinfectant towelette in a foil packet, two or three 4"X4" gauze pads, and one or two band-aids. Instruction on how to use the kits should be included in the inservice training program. These kits should be distributed to employees, and new kits should be available from the school office.
Coastal Health Care of Virginia Beach, Virginia
Call: 1-800-729-4325
Includes: Coastal Health Care has a variety of safety handbooks, posters, and videos available, including materials on bloodborne pathogens. You may order by calling the 1-800 number listed above. Be sure to ask for the "school" version of the materials as Coastal Health Care also provides "business" versions at higher prices.
Cost: $____

III. CONCLUSION

This Memorandum has been designed to alert you to OSHA's "Final Rule for Occupational Exposure to Bloodborne Pathogens" and to highlight some of the important provisions in the Rule. Unfortunately, the new Rule will add more paperwork and expense to our schools. Nevertheless, it has been designed to help employers protect their staffs and student bodies from serious diseases that can be encountered in the school setting.

All of the steps that a school must follow to be in compliance with the Rule cannot be covered in a Memorandum of this nature. Therefore, you should encourage each one of your member schools to purchase one of the training kits that have been assembled specifically to assist employers in complying with the Rule.

If you have other questions concerning bloodborne pathogens, or if you need more information concerning the training kits, please feel free to contact Steve Cummings in the Washington office at (202) 547-2991.