

INFECTIOUS DISEASE POLICY/EXPOSURE CONTROL PLAN

Purpose

Grin & Grow Ltd. (hereinafter “Grin & Grow”, “Center”, or “Agency”) desires that all people associated with the Center—children, families, educators, and visitors—are provided communication and protection during hours of operation. Our purpose will be met by managing illnesses and preventing the spread of infectious diseases throughout the Center.

Grin & Grow is committed to providing a safe and healthy environment, responding to the needs of children or adults with symptoms of infectious disease, and complying with exclusion policies and the Iowa Department of Public Health guidelines.

Definitions

Exclusion: When a child or adult are not able to attend or participate in our program.

Illness: Any sickness or symptoms that affect the child or adult’s ability to participate in our program. Some examples would be a fever of 100 degrees or more, excessive coughing, vomiting, or diarrhea.

Immunization Status: An “Iowa Department of Public Health Certificate of immunization” demonstrates each child is current with required immunizations and updated certificates are provided as needed.

Infection: Bacteria or viruses in the body.

Infestation: Arthropods (head lice, bed bugs, etc.) on the body or on the clothing of children or adults.

Infectious Disease: A disease that can spread by air, water, or person. A disease that would require the infected child or adult to be excluded.

Immunizations

All children enrolled in our program are required to be immunized according to the standards set forth by the Iowa Department of Public Health.

A current “Iowa Department of Public Health Certificate of Immunization” for every child must be kept on file in the Grin & Grow office.

The Iowa Department of Public Health will conduct an annual audit of all children to ensure immunizations follow regulation.

Physicals

All children in our program are required to have an annual physical examination that demonstrates they are able to participate in our program.

The child’s physical will also identify any health conditions and medical procedures needed.

Grin & Grow will keep a current physical examination record, signed by an authorized physician, for every child.

The Iowa Department of Public Health will conduct an annual audit of all children to ensure physicals follow regulation.

Handwashing

Proper and frequent handwashing is a primary weapon against the spread of transmission of infectious diseases between children and adults in a child care setting. The Iowa Department of Human Services requires

that adults demonstrate clean personal hygiene practices sufficient to prevent or minimize the transmission of illness or disease.

Licensing regulations require adults wash their hands at the following times:

- Upon arrival in a classroom
- Immediately before preparing a food service, eating, or performing a food activity
- Immediately after diapering a child
- Before leaving a restroom with a child or by themselves
- Before and after administering non-emergency First Aid to a child, even when wearing required gloves.
- After handling animals.

Diaper Changing

Parents are required to maintain a minimum of eight (8) disposable diapers or eight (8) disposable pull-ups for their child(ren) at the Center at all times. Parents will be informed when the diaper or pull-up supply is low. Staff will conduct diaper changing procedure for all children every two (2) hours when children are awake. Diapers or pull-ups, whether wet or soiled, will be removed and replaced with a clean diaper or pull-up at every diaper changing procedure.

When changing diapers, adults will adhere to the following procedures, which are also posted at every changing table, to prevent exposure to any potential bodily fluid or spread of fecal matter, germs, or bacteria:

1. Get Organized:
 - a. Clean changing table
 - b. Materials ready (diaper, clothes, wipes, plastic bag, disposable gloves, diaper cream)
2. Carry Child to Changing Table
 - a. Always keep a hand on the child
 - b. Remove clothing (socks and shoes, too, if needed) and place in plastic bag
3. Clean Child's Diaper Area
 - a. Place child on changing table, unfasten soiled diaper, but leave under child
 - b. Lift child's legs
 - c. Clean skin on genitalia and buttocks, using front to back method
 - d. Place soiled wipes into soiled diaper
 - e. Fold soiled diaper inward
 - f. Place soiled diaper into hands-free waste-can
 - g. Remove gloves and place in hands-free waste-can
 - h. Use disposable wipe to clean caregiver hands
 - i. Use disposable wipe to clean child's hands
 - j. Discard disposable wipes in hands-free waste-can
4. Put on Clean Diaper and Dress Child
 - a. Slide a fresh diaper under child
 - b. Put on clean disposable gloves to apply cream, discarding gloves after applying in a hands-free waste-can
 - c. Take notice and document any skin problems
5. Wash Child's Hands
 - a. Use soap, running water, and paper towel.
6. Clean and Disinfect Diaper-Changing Surface
 - a. Wet entire surface with cleaning solution. Dry with paper towels.
 - b. Wet entire surface with disinfection solution, let site for designated dwell time, then dry with paper towels.

7. Wash Adult's Hands
 - a. Use soap, running water, and paper towel.
8. Document diaper changes on appropriate form.

Medical Emergency Plan

In the event of a medical emergency, adults should follow the procedures outlined below:

- Child Receives Minor Cut, Scrape, or Other Injury
 - Put on protective gloves and follow Universal Precaution procedure
 - Check child to determine extent of injury
 - If child is bleeding, follow First Aid procedures and apply appropriate compress to the cut or injury.
 - Apply cold compress to reduce swelling.
 - Notify your supervisor.
 - Prepare Accident Report for parent signature and office file.
- Child Receives Major Cut or Other Injury
 - Put on protective gloves.
 - Check child to determine extent of injury.
 - If child is bleeding, follow First Aid procedures and apply appropriate compress to the cut or injury.
 - If emergency transport is required, call 911 and request medical assistance.
 - Notify parent of injury/accident and request presence at Center/hospital.
 - Notify your supervisor.
 - Prepare Accident/Incident Report for parent signature and office file.
- Child is Choking
 - Put on protective gloves.
 - Encourage child to cough/expel choking item.
 - If child is unable to cough or expel item, apply abdominal thrusts for preschoolers or back blows and chest thrusts for infants.
 - If unable to dislodge item, call 911 for medical assistance.
 - Notify supervisor or other person for assistance.
 - Prepare Accident/Incident report for parent signature and office file.
- Unconscious/Not Breathing Child
 - Put on protective gloves.
 - Apply Rescue Breathing techniques.
 - Call 911 for medical assistance.
 - Continue Rescue Breathing until assistance arrives.
 - Notify supervisor.
 - Notify parent of injury/accident and request presence at Center/hospital.
 - Prepare Accident/Incident Report for parent signature and office file.
- Poisoning
 - Call Poison Control Center (posted by telephone) and follow their directions.
 - Call 911.
 - Notify supervisor.
 - Notify parent of injury/accident and request presence at Center/hospital.
 - Prepare Accident/Incident Report for parent signature and office file.

Exclusion of Children Exhibiting Symptoms of Illness

The Director of Education or the Program Coordinator shall notify a child's parent, legal guardian, or other persons with parent authorization when their child has any sign or symptom that requires exclusion from the Center. Parents shall be asked to consult with the child's health care provider regarding care and treatment of the child's illness and to inform the Center regarding care recommendations given by the health care provider. Child care staff shall follow directions given by the child's health care provider.

Grin & Grow may temporarily exclude a child or send them home as soon as possible if one or more of the following conditions exist:

- The illness prevents the child from participating comfortably in activities as determined by the Center.
- The illness results in a greater need for care than the child care staff can provide without compromising the health and safety of the other children as determined by the Center.
- The child has any of the following conditions:
 - Fever of 100 degrees or higher.
 - Symptoms and signs of possible severe illness until medical professional evaluation finds the child able to return to the Center. Symptoms and signs of possible severe illness shall include lethargy, uncontrolled coughing, inexplicable irritability, inexplicable persistent crying, difficult breathing, wheezing, or other unusual signs for the child.
 - Diarrhea, defined by watery stools, decreased form of stool, and increased frequency of passing stool. Children with diarrheal illness of infectious origin may be allowed to return to the Center once diarrhea resolves, except for children with diarrhea caused by Salmonella Typhus, Shigella, or E. Coli 0157:H7.
 - Blood in stools not explainable by dietary change, medication, or hard stools.
 - Vomiting illness for two or more episodes within 24 hours. Children with vomiting will be excluded until vomiting resolves or until a health care provider determines the cause of vomiting is not contagious and the child is not in danger of dehydration.
 - Mouth sores, unless a health care provider determines the child is noninfectious.
 - Rash, until a physician determines symptoms do not indicate a communicable disease.
 - Child has Pink Eye (Conjunctivitis), Head Lice, Tuberculosis, Impetigo, Strep Throat, Scabies, Chicken Pox, Pertussis, Mumps, Hepatitis A, Measles, Rubella, Shingles, Herpes Simplex, or any other condition based on the recommendation of the Iowa Department of Public Health.

Cleaning and Sanitizing Procedures

- Cleaning, Disinfecting, and Sanitizing Tables and Diapering Area
 - When preparing tables for meals or as needed, adults will perform the following steps:
 - Remove any food items or other items
 - Spray table with Cleaning Solution (spray bottle marked "Cleaning") and wipe with a paper towel
 - Spray table with Sanitizing Solution (spray bottle marked "Sanitizer") and let sit for dwell time listed on Bleach container, then wipe with a paper towel
 - Follow above steps for chairs, too
 - For Diaper Changing Table use spray bottle marked "Disinfecting" and let sit for dwell time listed on Bleach container, then wipe with a paper towel
- Bleach and Water Solutions Preparation

- When using bleach and water for sanitizing, adults shall prepare as follows:
 - Spray bottle marked “Cleaning”:
 - 1 Drop Dish Detergent to 1 Pint Water
 - 2 Drops Dish Detergent to 1 Quart Water
 - 3 Drops Dish Detergent to 1 Gallon Water
 - Spray bottle marked “Disinfecting”:
 - ¾ Teaspoon Bleach to 1 Pint Water
 - 1 ½ Teaspoons Bleach to 1 Quart Water
 - 2 Tablespoons to 1 Gallon Water
 - Spray bottle marked “Sanitizing”:
 - 1/8 Teaspoon to 1 Pint Water
 - ¼ Teaspoon to 1 Quart Water
 - 1 Teaspoon to 1 Gallon Water
- Changing Bleach and Water Solutions
- A solution of Bleach/Water loses its strength over 24 hours, so a fresh mixture is needed every day. To ensure that solutions are made fresh daily:
 - Opening staff will mix all spray bottles for every classroom, diaper area, and kitchen.
 - Closing staff will empty all spray bottles and leave them in a common area for Opening staff.

Responsibilities

Grin & Grow Ltd. is responsible for:

- Ensuring all required enrollment documents are collected, maintained/updated, and stored appropriately to meet regulations.
- Ensuring reasonable steps are taken to prevent the spread of infectious disease.
- Ensuring staff are cleaning and sanitizing educational materials, furniture, laundry, and surfaces in accordance with cleaning schedule regulations.
- Ensuring parents are notified if there is an occurrence of an infectious disease.
- Ensuring recommendations by the Iowa Department of Public Health, in the event of an outbreak of an infectious disease, are followed and communicated with parents.
- Ensuring parents, the Iowa Department of Public Health, and the Department of Human Services are informed within 24 hours of becoming aware that an enrolled child is suffering from an infectious disease.
- Ensuring children not immunized against vaccine-preventable disease do not attend the Center when an infectious disease is diagnosed.
- Supporting staff in the implementation of recommendations for exclusion and from the Iowa Department of Public Health.
- Monitoring Infectious Disease Policy and consult with staff to evaluate the procedures and identify any risks or hazards encountered.
- Ensuring appropriate and current information and resources are provided to staff and parents regarding the identification and management of infectious diseases, blood-borne viruses, and infestations.
- Keeping informed about current legislation, information, research, and best practice.
- Ensuring any changes to policy are communicated to staff and parents in a timely manner.
- All staff are mindful and preserve confidentiality of individual children and adult medical circumstances.

Staff are responsible for:

- Notifying the office immediately upon becoming aware an enrolled child is suffering from an infectious disease.
- Ensuring at least one staff present has completed First Aid and CPR training.
- Practicing good self-hygiene and infection control procedures.
- Ensuring children practice good self-hygiene practices.
- Ensuring exclusion requirements for infectious diseases are followed.
- Providing information and resources to parents/guardians to assist in identifying and managing infectious diseases and infestations.
- Providing Head Lice notification for all parents and information about treatment for children.
- Observing signs and symptoms in children that may indicate the presence of an infectious disease
- Supporting the child's health and emotional needs of any child suspected of having an infectious illness.
- Implementing appropriate health and safety procedures when treating ill children.
- Implementing consistent handwashing, daily cleaning, protective glove use, and appropriate handling and preparation of food.
- Maintaining ongoing professional development opportunities for Health and Safety.
- Ensuring children do not share cribs or cots during rest time.
- Cleaning and sanitizing educational materials, furniture, laundry, and surfaces in accordance with cleaning schedule regulations.
- If a child has a toileting accident, placing the soiled items in a plastic bag with the child's name on it and given to the parent at pick-up.

Families are responsible for:

- Providing diapers, pull-ups, and spare clothing (to match the current season) at all times.
- Keeping children at home if they are unwell or have an exclusionary infectious disease.
- Keeping children at home when an infectious disease has been diagnosed has been diagnosed at the Center and their child is not fully immunized against the diagnosed infectious disease.
- Informing the Center if their child has an infectious disease or has been in contact with a person who has an infectious disease.
- Providing accurate and updated information on enrollment forms as changes occur.
- Providing accurate and updated Immunization Status, along with the updated "Iowa Department of Public Health Certificate of Immunization".
- Complying with exclusion periods.
- Regularly checking children's hair for live lice or lice eggs/nits. If lice or nits are present, families will check and treat the household environment, including members and vehicles.
- Notifying the Center if head lice or nits have been found.

UNIVERSAL PRECAUTIONS

Exposure Control Plan

Grin & Grow Ltd. is committed to providing a safe and healthy work environment for our entire staff. In pursuit of this endeavor, 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 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 to employees and training
- Recordkeeping
- Procedures for evaluating circumstances surrounding an exposure incident

The methods of implementation of the standard elements are discussed in the subsequent pages of this ECP.

Program Administration

The Director of Operations and Development and the Director of Education are responsible for the implementation of the ECP. The Director of Operations and Development and the Director of Education will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. Contact location and telephone number: Grin & Grow, Ltd., 608 West 4th Street, Waterloo, Iowa 50702; 319-236-2063.

Those employees who are determined to have occupational exposure to blood or other potentially infectious materials (OPIM) must comply with the procedures and work practices outlined in this ECP.

The Director of Operations and Development and the Director of Education will maintain and provide all necessary personal protective equipment (ie: gloves), engineering controls (ie: proper waste disposal containers), and red hazard bags as required by the standard. The Director of Operations and Development and the Director of Education will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes. Contact location and telephone number: Grin & Grow, Ltd., 608 West 4th Street, Waterloo, Iowa 50702; 319-236-2063.

The Director of Operations and Development and the Director of Education will be responsible for ensuring that all medical actions required are performed and that appropriate employee health and OSHA records are maintained. Contact location and telephone number: Grin & Grow, Ltd., 608 West 4th Street, Waterloo, Iowa 50702; 319-236-2063.

The Director of Operations and Development and the Director of Education will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives. Contact location and telephone number: Grin & Grow, Ltd., 608 West 4th Street, Waterloo, Iowa 50702; 319-236-2063.

Employee Exposure Determination

The following is a list of job classifications with potential occupational exposure:

<u>JOB TITLE</u>	<u>DEPARTMENT/LOCATION</u>
Teacher	Preschool Classrooms
Lead Teachers	Infant and Toddler Classrooms
Child Care Assistants	Preschool, Toddler, and Infant Classrooms

The following is a list of job classifications in which **some** employees at our establishment have occupational exposure. Included is a list of tasks and procedures, or groups of closely related tasks and procedures, in which occupational exposure may occur for these individuals:

<u>JOB TITLE</u>	<u>DEPARTMENT/LOCATION</u>	<u>TASK/PROCEDURE</u>
Director of Operations and Development	Administrative Office	Classroom Substitute
Director of Education	Center Office	Classroom Substitute
Program Coordinator	Center Office	Classroom Substitute
Cook	Center Kitchen	Classroom Substitute
Janitor	All Rooms	Cleaning

Part-time, temporary, contract, and per diem employees are covered by the standard. How the provisions of the standard will be met for these employees is described in the ECP.

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 have an opportunity to review this plan at any time during their work shifts by contacting the Director of Education or the Program Coordinator.

The Director of Operations and Development, The Director of Education, and the Program Coordinator are responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect any new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

Engineering Controls and Work Practices

Engineering controls and work practice controls will be used to prevent or minimize exposure to bloodborne pathogens. The specific engineering controls and work practice controls used are listed below:

- Barrier gloves will be worn when changing diapers.
- Barrier gloves and other protective devices, as appropriate, will be worn when responding to first aid needs of a child or adult involving blood or other bodily fluids
- Provision and maintenance of first aid supplies/response kit within each classroom.
- Provision and maintenance of first aid supplies/response kit within each Center office.

- First aid kits accompany class when leaving the Center for walks, field trips or to go onto the playground.
- Staff will carry a set of barrier gloves on their person whenever supervising children.

Sharps disposal containers are inspected and maintained or replaced by the Director of Education or the Program Coordinator every month or whenever necessary to prevent overfilling.

This facility identifies the need for changes in engineering control and work practices through review of OSHA records, employee interviews, committee activities and annual licensing inspections. We evaluate need procedures or new products by review of recommended safety check lists, annual review training and discussion with agency staff.

The following staff are involved in this process: All staff are involved in annual review of the agency exposure control plan. The Director of Operations and Development, the Director of Education, and the Program Coordinator will ensure effective implementation of these recommendations.

Personal Protective Equipment (PPE) (ie: gloves)

PPE is provided to our employees at no cost to them. Training is provided by the Director of Education, the Program Coordinator, or community health professionals in the use of the appropriate PPE for the tasks or procedures employees will perform.

The types of PPE available to employees are as follows:

- Barrier gloves
- Eye protectors
- Exposure aprons
- CPR mouth guards
- Exposure control disposable waste bags

PPE are located in Center classrooms, Center office and administrative storage areas and may be obtained through the Director of Education or Program Coordinator. Classroom staff should request replacement supplies from the Director of Education or Program Coordinator when replenishment of classroom first aid/response kits is required.

All employees using PPE must observe the following precautions:

- Wash hands immediately or as soon as feasible after removal of gloves or other PPE.
- Remove PPE after it becomes contaminated and before leaving the work area. Used PPEs may be disposed of in red waste disposal bags and covered trash receptacles.
- Wear appropriate gloves when it can be reasonably anticipated that there may be hand contact with blood or Other Potentially Infectious Materials (OPIM), and when handling or touching contaminated items or surfaces; replace gloves if torn, punctured, 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 cracking, 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: Used PPE materials or waste should be bagged and sealed using a red disposable waste bag, then placed within a waste container which is closable for disposal by housekeeping personnel.

Housekeeping

- Regulated waste is placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded (see Labels), and closed prior to removal to prevent spillage or protrusion of contents during handling.
- The procedure for handling sharps disposal containers is:
 - In lieu of using a sharps disposal container, each classroom will have a thick plastic jug labeled, "Sharps Disposal" and will place sharps in this designated container after each use.
 - When the designated container is full, the lid will be duct-taped and it will be placed in a garbage receptacle outside of the classroom and taken out with the garbage to the dumpster.
- The procedure for handling other regulated waste is: General waste shall be placed in closable waste containers and disposed by the housekeeping personnel. PPE materials shall be placed inside sealed red disposable bags and placed inside closable waste containers for disposal by the housekeeping personnel.
- Contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leak-proof on sides and bottoms, and labeled or color-coded appropriately. Sharps disposal containers are available at center office. Containers are portable and may be taken to rest room or private area for use and then returned to office location.
- Bins and pails (e.g., wash basins or basins used for vomiting) are cleaned and decontaminated as soon as feasible after visible contamination.
- Broken glassware which may be contaminated is picked up using mechanical means, such as a brush and dust pan.

Laundry

The following contaminated articles will be laundered by this company:

Contaminated cot bedding will be laundered by classroom staff as soon as feasible after visible contamination.

The following laundering requirements must be met:

- handle contaminated laundry as little as possible, with minimal agitation
- place wet contaminated laundry in leak-proof, red bags before transport.
- wear the following PPE when handling and/or sorting contaminated laundry: Gloves, apron, glasses

Labels

The following labeling method(s) is used in this facility:

EQUIPMENT TO BE LABELED LABEL TYPE (size, color, etc.)

LABEL TYPE (size, color, etc)

Blood contaminated waste

Red biohazard disposable bag

Contaminated laundry

The Director of Operations and Development, the Director of Education, or the Program Coordinator will ensure 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 Director of Education or the Program Coordinator if they discover regulated waste containers, contaminated equipment, etc. without proper labels.

HEPATITIS B VACCINATION

The Director of Operations and Development, the Director of Education, the Program Coordinator, or a community health professional will provide training to employees on Hepatitis B vaccinations, addressing the safety, benefits, efficacy, methods of administration, and availability. The hepatitis B vaccination series is available at no cost after training and within 10 days of initial assignment to employees identified 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, or
- 3) medical evaluation shows that vaccination is contraindicated.

However, if an employee chooses to decline 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 of the vaccination is kept in the individual employee's personnel file: medical section.

Vaccination will be provided by the health professional or clinic designated by Grin & Grow. Following hepatitis B vaccinations, the health care professional's Written Opinion 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 the Director of Operations and Development, the Director of Education, or the Program Coordinator at the following telephone number: 319-236-2063.

An immediately available confidential medical evaluation and follow-up will be conducted at the Unity Point Occupational Health Clinic. Following the initial first aid (clean the wound, flush eyes or other mucous membrane, etc.), 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 tested as soon as possible to determine HIV, HCV, and HBV infectivity; document that the source individual's test results were conveyed to the employee's 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 the identity and infectious status of the source individual (ie: 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, 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 Director of Operations and Development, the Director of Education, and the Program Coordinator will ensure 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 Director of Education or the Program Coordinator will ensure 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 Director of Operations and Development, the Director of Education, or the Program Coordinator will provide the employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

The Director of Operations, the Director of Education, or the Program Coordinator 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
- protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)
- location of the incident (play room, infant/toddler room, playground, etc.)
- procedure being performed when the incident occurred
- employee's training

If it is determined that revisions need to be made, the Director of Operations and Development, the Director of Education, or the Program Coordinator will ensure that appropriate changes are made to this ECP. (Changes may include an evaluation of safer devices, adding employees to the exposure determination list, etc.)

EMPLOYEE TRAINING

All employees who have occupational exposure to bloodborne pathogens receive training conducted by a community health professional. All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

- a copy and explanation of the standard
- an explanation of our ECP and how to obtain a copy
- an explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
- an explanation of the use and limitations of engineering controls, work practices, and PPE
- an explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE, and explanation of the basis for PPE selection
- information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine will be offered free of charge, information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM

- an explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available
- information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
- an explanation of the signs and labels and/or color coding required by the standard and used at this facility
- an opportunity for interactive questions and answers with the person conducting the training.

Training materials for this facility are available at Center offices.

RECORDKEEPING

Training records are completed for each employee upon completion of training. These documents will be kept for at least three years at the Center, located at 608 West 4th Street, Waterloo, Iowa 50702, in the individual employee personnel file and/or in the agency training summary file.

The training records include:

- the dates of the 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 sessions

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 the Director of Operations and Development, Grin & Grow Ltd., 608 West 4th Street, Waterloo, Iowa 50702.

Medical Records

Medical records are maintained for each employee with occupational exposure in accordance with 29 CFR 1910.20, "Access to Employee Exposure and Medical Records".

The Director of Operations and Development, the Director of Education, and the Program Coordinator are responsible for maintenance of the required medical records. These **confidential** records are kept at the Center, located at 608 West 4th Street, Waterloo, Iowa 50702 for at least the **duration of employment plus 30 years**.

Employee medical records are provided upon request of the employee or to anyone having written consent of the employee within 15 working days. Such requests should be sent to the Director of Operations and Development, Grin & Grow, 608 West 4th Street, Waterloo, Iowa 50702.

OSHA Recordkeeping

An exposure incident is evaluated to determine if the case meets OSHA's Recordkeeping Requirements (29 CFR 1904). This determination and the recording of activities are done by the Director of Operations and Development.