SCHOOL NURSE ORGANIZATION OF WASHINGTON

POSITION STATEMENT

Regulations on Bloodborne Pathogens in the School Setting

HISTORY:

The Occupational Safety and Health Administration (OSHA) first published the Occupational Exposure to Bloodborne Pathogens Standard in the December 6, 1991 issue of the *Federal Register*. Revised directives have been issued since then to help minimize the serious health risks faced by workers exposed to blood and other potentially infectious materials that may contain pathogens that cause disease and possible death. The revised directives recognize and emphasize advances made in modern medical technology and remind employers to use readily available technology in their health and safety programs.

DESCRIPTION OF ISSUE:

In the past decade, significant medical advances have occurred that help control bloodborne pathogens. OSHA has clarified the standard through written interpretation in a revised compliance directive. In the state of Washington public schools are legally required to follow OSHA guidelines. As part of a school district's Exposure Control Plan, the chief administrative officer, with the advice of the school nurse, Centers for Disease Control guidelines, state departments of health and environmental sciences, local health departments, and individual district policies shall adhere to the following key revisions:

1. Develop and annually review a written Exposure Control Plan designed to protect employees from possible infection caused by contact with bloodborne pathogens as a result of performing job duties. The plan should reflect consideration and use of commercially available safer medical devices (needleless systems, shielded devices, or safety features designed to reduce the likelihood of injury), safe work practices, administrative controls and personal protective equipment.

2. Determine which employees could reasonably be expected to have exposure to bloodborne pathogens or other materials potentially contaminated with blood as a result of performing job duties.

3. Provide effective training and education for all employees, emphasizing interactive learning that allows opportunity for discussion with a qualified trainer and also additional training for occupationally exposed employees whenever safer devices are implemented. The emphasis in training should rely on relevant evidence. FDA approval will help ensure the effectiveness of devices designed to prevent exposure to bloodborne pathogens.

4. Provide Hepatitis B vaccine for occupationally at risk and exposed employees and incorporate Centers for Disease Control guidelines on post-exposure evaluation and follow-up for HIV and the Hepatitis C virus.

5. Communicate the reporting procedure for exposure incidents to all employees.

6. Provide immediate post-exposure medical evaluation and follow-up.

7. Facilitate record keeping in compliance with applicable laws and guidelines about confidentiality of health records.

8. Recognize the threat to employees responsible for direct student care (often the school nurse) who are potentially exposed to injuries from contaminated sharps. Needlesticks and other percutaneous injuries continue to be of concern due to the frequency of their occurrence and the severity of health effects associated with them.

RATIONALE:

School nurses are often the only health professionals among the professionals on the education team. The school nurse has the educational background and knowledge to assist school districts with compliance to the OSHA regulations on bloodborne pathogens.

CONCLUSION:

It is the position of SNOW that the OSHA regulations on bloodborne pathogens apply to the school setting and that school nurses should be directly involved at the state and local level in policy development, as well as implementation of the policies regarding these regulations. It is also the position of SNOW that school nurses should be directly involved in and/or responsible for in-service programs for school staff. School nurses as professional health care providers and role models should exemplify stringent practice of universal precautions, workplace practices, and engineering controls. As educators, school nurses can give students and coworkers their most valuable asset - an education in protecting themselves and others at all times.

References/Resources:

Centers for Disease Control and Prevention (1999). Exposure to blood: *What health-care workers need to know*.

National Association of School Nurses (1999). *Occupational exposure to bloodborne pathogens: implementing OSHA standards in the school setting*.

Occupational Safety & Health Administration (November 5, 1999). *Bloodborne pathogens compliance directive revision*. Compliance Directive CPL2-244D. Available at www.osha.gov

Occupational Safety & Health Administration (January 18, 2001). *Federal register, Occupational exposure to bloodborne pathogens: Needlestick and other sharps injuries. Final rule.*

Adopted: September 2003