



SAFETY POLICY and PROCEDURE

Title: *Employee Bloodborne Pathogens Exposure Policy*

Policy Number: SP-0000

Implementation Date: 8/14/2000

Date – Review without Revision: N/A

Date – Review with Revision: 10/12/2005; 3/31/2009; 9/10/2012

PURPOSE:

To outline a procedure for handling work related bloodborne pathogen (BBP) exposures sustained by NIA IRP employees and contractors. To provide standards and procedures for an occupational exposure to blood and body fluids or other potentially infectious materials (OPIM).

POLICY:

The National Institute on Aging Intramural Research Program (NIA IRP) has a local arrangement through a contract with Johns Hopkins Bayview Occupational Health Services (JHB OHS) for occupational medical services. JHB OHS is located in the JHB Alpha Commons Building. JHB OHS Medical Clinic hours are 8:00 am – 4:30 pm. After hours exposures and needle stick specific exposures involving research participants will be handled by the MedStar Harbor Hospital, as described below.

SCOPE:

- This policy applies to all employees (Full Time Equivalent (permanent or temporary), Visiting Fellow, IRTA Fellow, Pre-IRTA, Summer IRTA student, Contract staff (JHBMC, JHU, Facilities, HVAC, Housekeeping, MHRI, Security, Animal Care Workers, Computer/Networking & Telephone staff, laboratory and office staff), Courtesy Associates, Special Volunteers, Guest Researchers, Inter-Governmental Personnel Act (IPA) staff, National Research Council (NRC) Fellows, and trainees) of the National Institute on Aging Intramural Research Program (NIA IRP) Baltimore, MD and who have had an occupational exposure or exposure incident during the performance of the employee's duties. Herein everywhere "employee" refers to employees as described above, unless otherwise noted.
 - NIA IRP Federal employees, visitors, or contract employees who work at Bethesda and Poolesville, MD locations shall use NIH Occupational Medical Services (NIH OMS).
- This policy applies to blood, saliva, needle sticks, open wounds, bites, and other exposures that potentially present a risk for HIV and other infections including but not limited to Hepatitis B and Hepatitis C.

DEFINITIONS (Reference: 29CFR 1910.1030)

1. **Occupational Exposure** – reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties.

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2. **Exposure Incident** – a specific eye, mouth, other mucous membrane, non-intact skin, or parenteral contact or possible contact with blood or other potentially infectious materials that result from the performance of an employee's duties.
3. **Non-intact skin** – skin surface that is broken in any way including but not limited to dermatitis, hangnails, cuts, abrasions, chafing, and acne.
4. **Bloodborne Pathogens (BBP)** – pathogenic microorganisms that are present in human blood and/or body fluids that can cause disease in humans. These pathogens include, but are not limited to, Hepatitis B virus (HBV), Hepatitis C virus (HCV) and human immunodeficiency virus (HIV).
5. **Contaminated** – the presence or the reasonably anticipated presence of blood or other potentially infectious materials on an item or surface.
6. **Other Potentially Infectious Materials (OPIM)** – any of the following human or animal body fluids or tissues:
 - Semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, tissues such as lymph nodes and bone marrow.
 - Any body fluid that is visibly contaminated with blood.
 - All body fluids in situations where it is difficult or impossible to differentiate between body fluids.
 - Any unfixed tissue or organ (other than intact skin) from a human (living or dead).
 - HIV or OPIM within cells or cell, tissue, or organ culture supernates.
 - HIV- or HBV-containing culture medium or other solutions.
 - Blood, organs, or other tissues from experimental animals known to be or potentially infected with HIV, HBV, Simian Immunodeficiency Virus (SIV), Simian Retrovirus (SRV), or other retroviruses.
7. **Parenteral** – piercing mucous membranes or the skin barrier through such events as needle sticks, human or animal bites, cuts, and abrasions.
8. **Source Individual** – any individual or animal, living or dead, whose blood or other potentially infectious materials may be a source of occupational exposure to the employee.
9. **Employee** – a Full Time Equivalent (FTE) (permanent or temporary), Visiting Fellow, IRTA Fellow, Pre-IRTA, Summer IRTA student, Contract staff (JHBMC, JHU, Facilities, HVAC, Housekeeping, MHRI, Security, Animal Care Workers, Computer/Networking & Telephone staff, laboratory and office staff), Courtesy Associates, Special Volunteers, Guest Researchers, Inter-Governmental Personnel Act (IPA) staff, National Research Council (NRC) Fellows, and trainees.
10. Determination of exposure classification:
 - General Classification:
 - **Classification A:** Includes those with job classifications in which employees either will or may have an occupational exposure.
 - **Classification B:** Includes those with job classifications in which there is no reasonably anticipated possibility of an occupational exposure.
 - See Attachment A for a list of job titles and their exposure classifications.
 - The employee's PI or supervisor must complete a New Hire Information Sheet for all new employees. This information is used to determine the exposure classification and need for BBP exposure training. If the employee changes duties, or is assigned new tasks involving human blood or body fluids, the employee, PI or supervisor must inform the NIA IRP Safety Office.
 - Biosafety levels are described as follows:

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- **Biosafety Level 1 (BSL1):** Work is done with defined and characterized strains of viable microorganisms not known to cause disease in healthy adult humans.
- **Biosafety Level 2 (BSL2):** Work is done with the broad spectrum of indigenous moderate-risk agents present in the community and associated with human disease of varying severity. Use of a Biological Safety Cabinet is required when production of aerosols is possible.
- **Biosafety Level 3 (BSL3):** Work is done with indigenous or exotic agents where the potential for infection by aerosols is real and the disease may have serious or lethal consequences.
- **Biosafety Level 4 (BSL4):** Work is done with dangerous and exotic agents that pose a high individual risk of life-threatening disease.
- Currently only BSL1, BSL2 and BSL2 with 3 practices are performed at the NIA IRP Baltimore.

PROCEDURE and RESPONSIBILITIES:

Employee Guidelines

All employees should take the following steps:

1. First Aid Procedures – DO NOT DELAY INITIATION OF FIRST AID PROCEDURES

- **Skin** - Wash with soap and water for 15 minutes.
- **Eyes and mucous membranes** - Irrigate for 15 minutes, using water or normal saline

2. Notification Requirements

1. The employee notifies the supervisor of exposure to BBP as soon as possible. Either the supervisor or the employee must notify the NIA IRP Safety Office (410) 558-8636 or mobile (240) 507-8758 immediately after.
 - The Safety Officer or employee's supervisor must notify the NIA IRP Deputy Director.
 - Contract employees shall follow their employer's procedures for additional incident reporting and compensation claims.

3. Medical Assessment

- Obtain medical assessment as described below.
- Complete the NIA IRP Illness Injury Report and return it to the NIA IRP Safety Office within 2 business days of returning to work.

NOTE: All employees are to report work related injuries and illnesses are to the NIA IRP Safety Office.

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Contract employees should take the following steps:

1. Report to nearest healthcare/emergency facility for initial incident evaluation, diagnosis, counseling, and treatment as described by employer's policies and procedures.
2. Contractors should be familiar with their organizational guidelines prior to the occurrence of work related BBP exposure.
3. Contract employees shall provide a copy of the incident paperwork to their employer for Workers' Compensation Claim.

Federal employees who work with research participants at NIA IRP clinical locations (Clinical Research Branch (CRB) and/or Mobile Research Vehicles (MRV)) having a Bloodborne Pathogen Exposure involving a needlestick should take the following steps:

1. Refer to BBP exposure guideline and instructional packets (including all MedStar Harbor Hospital required documentation) are available on the CRB, each MRV as well as in the NIA IRP Safety Office. NOTE: Injured staff must present "Instructions for Billing" sheet to MedStar Harbor Hospital's Emergency Department (ED) to ensure proper billing; see Attachment B. Instruction sheets are also included in BBP packets.
2. Report to MedStar Harbor Hospital ED for human BBP occupational needle stick incidents to receive source patient sample testing, medical treatment and post-exposure prophylaxis assessment.
3. Follow up care is provided by JHB OHS.

24 Hours / 7 days a Week

MedStar Harbor Hospital Emergency Department

3001 S Hanover St, Baltimore, MD 21225

(410) 350-3510

Federal employees who work on the NIA IRP Bayview campus having a Bloodborne Pathogen Exposure during normal JHB OHS medical clinic hours (weekdays between 8:00 a.m. – 4:30 p.m.) should take the following steps:

1. Obtain JHB OHS Referral form from NIA IRP Safety Office or Administrative Office.
2. Proceed immediately to JHB OHS with for initial incident evaluation, diagnosis, counseling, and treatment. DO NOT DELAY. TREATMENT IS MOST EFFECTIVE WITHIN THE FIRST FEW HOURS AFTER EXPOSURE.
3. Complete the Illness Injury Report as soon as possible and return it to the NIA IRP Safety Office.
4. The NIA IRP Safety Office or Administration will inform the Deputy Scientific Director or Clinical Director as soon as possible.
5. Contract employees will follow up with their employer and visitors will follow up with their personal physician.
6. Contract employees shall provide a copy of the incident paperwork to their employer for a Workers' Compensation Claim.

8:00 a.m. to 4:30 p.m. / Monday thru Friday

Johns Hopkins Bayview Occupational Health Service

5300 Alpha Commons (across Bayview Blvd.)

(410) 550-0477

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For Bloodborne Pathogen exposures occurring after normal JHB OHS medical clinic hours (between weekdays 4:30 pm – 8:00 am, weekends and holidays), Federal employees should take the following steps:

1. Notify Security (Gerontology Research Center (GRC) – (410) 558-8119, Biomedical Research Center (BRC) – (443) 740-2759 or ext.3000) of incident and obtain Exposure Instruction Packet at Security desk. Security will inform the NIA IRP Safety Officer and the Deputy Scientific Director. Packets include all MedStar Harbor Hospital required documentation. NOTE: Injured staff must present **“Instructions for Billing”** sheet to MedStar Harbor Hospital’s ED to ensure proper billing. Instruction sheets are also included in packets.
2. Report to MedStar Harbor Hospital emergency room for human BBP occupational needle stick incidents to receive source patient sample testing, medical treatment and post-exposure prophylaxis assessment.
3. Follow up care is provided by JHB OHS.

After hours, weekends and holidays
MedStar Harbor Hospital Emergency Department
3001 S Hanover St, Baltimore, MD 21225
(410) 350-3510

NIA IRP research with Non-Human Primates (NHP) is done at the Poolesville location. Federal employees who have a Bloodborne Pathogen Exposure involving NHP and/or primate tissue should take the following steps:

1. For incidents occurring during the hours of 8:30 a.m. – 5:00 p.m., employee must contact his/her supervisor and the NIH Occupational Medicine Services (OMS) at 301-496-4411.
2. For incidents occurring during the hours of 5:00 p.m. – 8:30 a.m. when the NIH OMS is closed, call the Clinical Center Operator at Bethesda, 301-496-1211. Ask the Operator to page an OMS physician on call immediately. You should get a response within 15 minutes. If not call the Clinical Center Operator a second time.
3. Employee will follow the instruction of the OMS Physician and will proceed to NIH OMS, Bethesda for evaluation as instructed by NIH OMS.
4. The employee’s supervisor contacts the Animal Program Director (APD) and the NIA IRP Safety Officer. If the Safety Officer or APD are unavailable, contact the Administrative Office at 410-558-8100 as soon as possible.

8:30 a.m. to 5:00 p.m. / Monday thru Friday
NIH Occupational Medicine Services
(301) 496-4411

After hours, weekends and holidays
Clinical Center Operator at Bethesda
(301) 496-1211

MEDICAL EVALUATION:

- A. Evaluation of a BBP exposure should be done by an occupational health or infectious disease specialist. Initial post exposure medical evaluation and counseling is completed by JHB OHS, MedStar Harbor Hospital Emergency Department or NIH OMS on employees who have had an exposure incident. JHB OHS will provide additional medical services for any exposed individual and

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will complete follow-up care only for Federal employees. Contract employees will follow up with their employer and visitors will follow up with their personal physician. Contract employees shall provide a copy of the incident paperwork to their employer for a Workers' Compensation Claim.

1. A confidential post-exposure evaluation will include counseling and diagnosis, and obtain consent for Hepatitis B and HIV testing from the exposed employee.
 - a) Hepatitis B vaccine and vaccination series is provided and encouraged for all NIA IRP employees and trainees. Contract employees are encouraged to obtain Hepatitis B vaccine and vaccination series from his/her employer.
 - Employees who decline must sign a statement stating that they declined.
 - An employee, who initially declines Hepatitis B vaccination but later decides to accept the vaccination, will receive Hepatitis B vaccination at that time.
 - b) The exposed employee's blood is collected as soon as possible after consent is obtained.
 - c) If the employee consents to baseline blood collection for HIV serologic testing, JHB OHS shall draw the blood sample and send it for testing.
2. An accredited laboratory conducts all laboratory tests at no cost to the employee.
3. Documentation of the route(s) of exposure, and the circumstances under which the exposure incident occurred are included in the medical evaluation. This information will be kept in the employee's medical record, not in the NIA IRP Safety Office files.
4. Medical staff informs the exposed employee of the tests results and provides counseling if the results are positive. The exposed employee is informed about applicable laws and regulations concerning disclosure of the identity and infectivity of the source individual.
- B. All medical evaluations and procedures including the Hepatitis B vaccine series, post-exposure evaluation and follow-up, including prophylaxis, are at no cost to the employee and must be initiated immediately. Post exposure prophylaxis is most effective when started within two hours after exposure.
- C. All information, guidance, procedures and policies provided must be consistent with the current recommendations of the current U.S. Public Health Service and Centers for Disease Control and Prevention (CDC) guidelines and "Recommendation of Immunization Practices Advisory Committee (ACIP) Post exposure Prophylaxis of Hepatitis B".
- D. Hepatitis B vaccination is available to all federal employees who have a potential for occupational exposure unless:
 1. The employee has previously received the complete Hepatitis B vaccination series;
 2. Antibody testing has revealed that the employee is immune; or
 3. The vaccine is contraindicated for medical reasons.
- E. JHB OHS shall ensure the employee has been informed of the results of the evaluation and also told about any medical conditions resulting from exposure to blood or other potentially infectious materials which require further evaluation or treatment.
- F. Employee Exposure Medical Records are maintained at JHB OHS.
 1. Accurate records for each employee with occupational exposure are completed in accordance with 29 CFR 1910.1020.
 2. The NIA IRP Safety Office maintains the following records or reports:
 - a) Injury / Illness Report Form
 - b) Sharps Injury Log
 - c) Copies of the CA-1 Workers' Compensation Claim Forms for Federal employees if appropriate
 - d) Copies of the source individual's declination or consent forms
 3. The NIH OMS receives the following:

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- a) Original CA-1 Workers' Compensation Claim Forms for Federal employees only from the NIA Safety Officer.
- b) A copy of the Injury / Illness Report Form from the NIA Safety Officer.
4. Training Records, Immunization Status and Employee Information Records are maintained by the NIA IRP Safety Office.
5. Employee medical records shall be kept confidential and they shall not be disclosed or reported without the employee's express written consent to any person within or outside the workplace except as required by law. Access to these confidential records shall include persons who require the information to perform official duties. Employee medical records shall be provided upon request for examination and for copying to the subject employee, or to a representative having written consent from the subject employee within a reasonable timeframe.
6. Records for occupational exposure are kept for at least the duration of employment plus 30 years in accordance with 29 CFR 1910.1020.
- G. In areas where occupational exposure is reasonably anticipated, the supervisor shall have available facilities/supplies for implementing immediate first aid following an occupational exposure.
- H. In areas where occupational exposure to Non-Human Primate (NHP) Bloodborne Pathogens is reasonably anticipated, the supervisor shall ensure that employees are enrolled in Animal Exposure Program (AEP).

DOCUMENTATION:

- Medical Records are maintained by service provider.

COMMUNICATION/EDUCATION:

- Training for this policy is the responsibility of the NIA IRP Safety Officer. Training is completed for new employees during orientation. Orientation must be completed before employees begin working with Bloodborne Pathogens.
- The policy will be distributed for inclusion into the NIA IRP Occupational Health and Safety Program. Elements of these guidelines will be included in the NIA IRP Annual Safety Refresher Training.
- Training is repeated annually during Bloodborne Pathogens Annual Training Program. This is an NIH Online Safety Training.
- Compliance with this policy is the responsibility of the employee and their Principle Investigator (PI) or supervisor. The NIA IRP Safety Officer will monitor compliance and provide assistance and/or retraining as required.

REFERENCES:

- Occupational Safety and Health Administration (OSHA) Regulations, Bloodborne Pathogens, Standard Number 1910.1030.
- Updated U.S. Public Health Service Guidelines for the Management of Occupational Exposures to HIV and Recommendations for Postexposure Prophylaxis, <http://www.cdc.gov/mmwr/preview/mmwrhtml/rr5409a1.htm>. CDC last reviewed: 8/2011 with no modifications.

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ATTACHMENT A – Exposure Classification

JOB TITLE	EXPOSURE CLASS	JOB TITLE	EXPOSURE CLASS	JOB TITLE	EXPOSURE CLASS
Acting Chief/Investigator	A	IRTA - postdoc	A	Research Assistant	A
Administrative Officer	B	IRTA - PRE	A	Research Associate	A
Animal Research Program Director	B	IRTA - student	A	Research Biologist	A
Animal Care Technician	B	IRTA - tech	A	Research Chemist	A
Biologist	A	IRTA fellow	A	Research Fellow	A
Cage Wash Attendant	B	Lab Office Manager	B	Research Psychologist	A
Chemist	A	Lab Tech	A	Research Scientist	A
Clerical Assistant	B	Laboratory Chief	A	SBRS/RES	A
Computer Specialist	B	Maintenance Mechanic	B	Safety Officer	A
Computer Systems Analyst	B	Manager	B	SBRS/RES Psychologist	A
Computer Technician	B	Mathematical Statistician	B	Scientific Director	A
Courtesy Associate	A	Medical Officer	A	Secretary	B
Database Application Programmer	B	Medical Photographer	B	Security Officer	B
Deputy Director	A	Medical Records Clerk	B	Senior Investigator	A
Director, Security	B	Network Administrator	B	Senior Research Fellow	A
DNA Bank Technician	A	NRC Fellow	A	Senior Staff Fellow	A
ECG Technician	A	Nurse Specialist	A	Senior Staff Scientist	A
Editorial Assistant	B	Office Assistant	B	Special Volunteer	A
Epidemiologist	A	Office Automation Clerk	B	Staff Clinician	A
Exchange Scientist	A	Office Supervisor	B	Staff Scientist	A
Facility Head	B	Personnel Management Specialist	B	Staff Scientist - math/stat	B
Genotyping Services Technician	A	Photographer	B	Statistician	B
Graphic Artist	B	Physiologist	A	Steamfitter	B
Guest Researcher	A	Post-Bac	A	Summer Intern	A
Human Resources Assistant	B	Post-doc Fellow	A	Supv. Animal Scientist	B
Information Development Specialist	B	Predoctoral Fellow	A	Tool Material Handler	B
Information Tech Specialist	B	Principal Investigator	A	Vet Facility Aide	B
Instrument Maker	B	Program Analyst	B	Visiting Fellow	A
Investigator	A	Program Assistant	B		
IPA, MD	A	Project Director	B		
IRTA	A	Psychologist	A		
IRTA - post-bac	A	Psychometric Tech	A		
Classification A: Includes those with job classifications in which employees either will or may have an occupational exposure.		Classification B: Includes those with job classifications in which there is no reasonably anticipated possibility of an occupational exposure			

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ATTACHMENT B – MedStar Harbor Hospital’s Billing Instructions for Emergency Services

Billing Instructions for Emergency Services (NIA IRP Federal Employees only)

These instructions apply ONLY to billing for emergency services and treatment provided to **Federal personnel** working for the National Institute on Aging (NIA).

These instructions ONLY apply to emergency services and treatment for a needle stick related to blood borne pathogen exposure (BBP), to include source blood testing if requested by the NIA employee. Any services provided for non-work related conditions must be billed to the employee or their insurance company.

- This sheet must be presented to Emergency Department Registration personnel when the employee arrives and a copy given to Tim Shetterly at MEDSTAR
- A copy of this sheet must be given to any ancillary department (laboratory, X-ray, etc.) providing services under the conditions given above.

Billing Instructions For PO # HHSN311201200070M

Please mail invoice to:

Administrative Office
National Institute on Aging
BioMedical Research Center
251 Bayview Blvd., Suite 100
Baltimore, MD 21224

Contact information:

Phone 410-558-8100
Fax 410-558-8103