

Morgan Support Services, Inc.

Exposure Control Plan

PURPOSE

Morgan Support Services is committed to providing a safe and healthful 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 our agency in 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 (PPE)
- * 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 these elements of the standard are discussed in the subsequent pages of this ECP.

PROGRAM ADMINISTRATION

- * The Health & Safety Compliance Officer (HSCO) is responsible for the implementation of the ECP. The HSCO will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. Contact location/phone number: Shawna Patterson, MSS Greensboro 336-457-3015
- * 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 HSCO will maintain and provide all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard. The HSCO will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes.
- * The HSCO will be responsible for ensuring that all medical actions required are performed and that appropriate employee health and OSHA records are maintained.
- * The HSCO will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives.

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EMPLOYEE EXPOSURE DETERMINATION

The following is a list of all job classifications at our establishment in which **all** employees have occupational exposure:

JOB TITLE	LOCATION
Habilitation Technician	The Shoppe & The Oasis & various residential settings
Floater (Part time/temporary)	The Shoppe & The Oasis & various residential settings
Program Coordinator	The Shoppe & The Oasis & various residential settings
Program Manager	The Shoppe & The Oasis & various residential settings

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:

JOB TITLE	LOCATION	TASK/PROCEDURE
Clinical Director	The SHOPPE, The Oasis, various residential settings	Training and Observation
Clinical Associate	The SHOPPE, The Oasis, various residential settings	Training and Observation
H&S Compliance Officer	The SHOPPE, The Oasis, various residential settings	Training and Observation

METHODS OF IMPLEMENTATION AND CONTROL

Universal Precautions

All employees will utilize universal precautions.

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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 through Heartland Company Information.

The HSCO is 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.

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Engineering Controls and Work Practices

Sharps disposal containers are located in the Records Room in each location. Sharps disposal containers are inspected and maintained or replaced by The HSCO whenever necessary to prevent overfilling.

This agency identifies the need for changes in engineering controls and work practices through the ongoing review of Morgan Support Services incident reports.

Personal Protective Equipment (PPE)

PPE is provided to our employees at no cost to them. Training is provided by the HSCO 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: Gloves & face masks

PPE is located in the supply closet, kitchen and bathrooms and may be obtained through the supply coordinator

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 workarea.
- * Used PPE may be disposed of in a biohazard bag.
- * Wear appropriate gloves when it can be reasonably anticipated that there may be hand contact with blood or 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.

The procedure for handling used PPE is as follows:

- * Employees will use a Blood Borne Pathogens (BBP) Kit containing clean-up packets and biohazard bag to absorb and dispose of potentially harmful blood and bodily fluids. BBP kits are located in the records room in each facility.
- * Employees will be assisted by other employees or leadership team when cleaning up an exposure incident to ensure that direct supervision of participants will be maintained

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POST-EXPOSURE EVALUATION AND FOLLOW-UP

Medical records for participants of Morgan Support Services are confidential, thus employees of Morgan Support Services should utilize universal precautions in all situations.

Should an exposure incident occur, contact Russell Morgan, Executive Director or The HSCO at the following number: 336-323-2870 or 336-457-3015 .

An immediately available confidential medical evaluation and follow-up will be conducted by Cone Health Urgent Care Center. 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.
- * HSCO will document exposure incident on the OSHA's form 300
- * Employee will complete a Morgan Support Services incident report within 24 hours of exposure

ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

The HSCO ensures 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 HSCO ensures 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
- * relevant employee medical records, including vaccination status

The HSCO provides the employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

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PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

Administrative Director will review the circumstances of all exposure incidents to determine:

- * engineering controls in use at the time
- * proper disposal of sharps
- * work practices followed
- * protective equipment or clothing that was used at the time of the exposure incident (gloves, face masks, etc.)
- * location of the incident
- * how the incident occurred
- * employee's training

The HSCO will record all percutaneous injuries from contaminated sharps in the Sharps Injury Log.

- * If it is determined that revisions need to be made, The HSCO will ensure that appropriate changes are made to this ECP.
- * Changes may include more frequent inspections of sharp containers and monitoring of sharps disposal by employees.

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EMPLOYEE TRAINING

All employees will receive training conducted by The HSCO upon hire and annually .

All employees will receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

- * review of the OSHA standard 29 CFR 1910.1030, Occupational Exposure to bloodborne Pathogens
- * availability of ECP through agency website (mssconfidential.com/health-and-safety) and a hard copy for quick reference maintained by HSCO
- * review video that contains methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
- * discussion of the use and limitations of engineering controls, work practices, and PPE
- * demonstration and discussion of the types, uses, location, removal, handling, decontamination, and disposal of PPE
- * information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, and the benefits of being vaccinated
- * information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM
- * discussion 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
- * discussion of the biohazard labels used at this facility
- * an opportunity for interactive questions and answers with the person conducting the training session.

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RECORDKEEPING

Training Records

Training records are completed for each employee upon completion of training. These documents will be kept in the employee's personnel records.

The training records include:

- * the dates of the training sessions
- * a summary of the training sessions
- * the names and qualifications of persons conducting the training
- * the names of person attending the training sessions

Employee training records are available to staff through their Heartland Employee Access account.

Medical Records

Medical records are maintained for each employee with occupational exposure in accordance with 29 CFR 1910.1020, "Access to Employee Exposure and Medical Records."

The HSCO is responsible for maintenance of the required medical records. These **confidential** records are kept in the employee's personnel file for the duration of employment plus 30 years. Employee medical records are available to staff through their Heartland Employee Access account and will be 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 HSCO, 500 Spring Garden St, Greensboro, NC 27401

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 activities are done by The HSCO.

Sharps Injury Log

In addition to the 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in the Sharps Injury Log. All incidences must include at least:

- the date of the injury
- the type and brand of the device involved
- work area where the incident occurred
- an explanation of how the incident occurred.

This log is reviewed at least annually as part of the annual evaluation of the program and is maintained for at least five years following the end of the calendar year that they cover. If a copy is requested by anyone, it must have any personal identifiers removed from the report.