

 NOVA SOUTHEASTERN UNIVERSITY Florida	
POLICY TITLE: Post-Exposure Policy and Procedure for Management of Blood and Body Fluid Exposure	
POLICY OWNER: Office of Environmental Health and Safety	
FUNCTION:	POLICY CODE NO:
EFFECTIVE DATE: September 1, 2011	REVIEW PERIOD: Annually
REVISION DATE: January 4, 2024	

I. DEFINITIONS:

- A. **Body fluids considered infectious:** substances that have been implicated in the transmission of HIV and viral hepatitis, i.e., blood, cerebrospinal, synovial, pleural, peritoneal, pericardial, amniotic fluids.
- B. **Body fluids considered non-infectious if no visible blood present:** sputum, nasal secretions, saliva, sweat, tears, urine, feces, emesis (gastric fluids).
- C. **Bloodborne Pathogens:** pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV) and human immunodeficiency virus (HIV).
- D. **Center for Disease Control (CDC):** the leading national public health institute of the United States.
- E. **Environmental Health and Safety (EHS) Liaison:** an employee within a NSU Health Clinic, NSU College / Business Unit designated to handle safety issues outlined by the NSU Office of Environmental Health and Safety. Please see the list of EHS Liaisons on the NSU Office of Environmental Health and Safety website at <https://www.nova.edu/ehs/index.html>.
- F. **Emergency Department (ED):** a facility which is usually attached to a general medical hospital; sometimes referred to as an emergency room (ER), which is staffed and manned 24 hours a day by physicians and trained personnel who handle a wide range of medical emergencies.
- G. **Employee:** An individual determined to be at risk for occupational exposure to blood or body fluids by way of their employment, and who has been assigned a NSU ID number and receives a University payroll check, including any students receiving compensation from NSU.

- H. **Exposed person:** a person exposed to blood or body fluids through needle stick, instruments, sharps, surgery, or traumatic events, including faculty, employee, resident, and student.
- I. **Exposure incident:** A specific eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood, body fluid, or other potentially infectious materials that results from the performance of an employee's duties.
- J. **HBV:** the hepatitis B virus.
- K. **HCV:** the hepatitis C virus.
- L. **HIV:** the human immunodeficiency virus that has been identified as the causative agent of AIDS.
- M. **Occupational Exposure** means 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.
- N. **Other Potentially Infectious Materials** means:
 - (1) The following human body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids;
 - (2) Any unfixed tissue or organ (other than intact skin) from a human (living or dead); and
 - (3) HIV-containing cell or tissue cultures, organ cultures, and HIV- or HBV-containing culture medium or other solutions; and blood, organs, or other tissues from experimental animals infected with HIV or HBV.
- O. **Post-Exposure Prophylaxis (PEP):** a defined regimen, as formulated by the CDC, to aid in the prevention of the development of infection with HIV and prescribed by an evaluating institution or physician.
- P. **Post-Exposure Management Team:** a team of individuals identified usually by the NSU Office of Environmental Health and Safety and/or NSU Health Clinics or other responsible personnel involved in an exposure that is responsible for follow-up with the exposed person. Members of the team may vary according to need and circumstances surrounding exposure incidents and will usually include the physician involved in the exposed person's evaluation, a physician to continue PEP treatment, and/or other persons knowledgeable in the process of care and evaluation of individuals exposed to bloodborne pathogens.
- Q. **Post-Exposure Management to Hepatitis B and Hepatitis C:** a defined regimen of

serologic testing, follow-up, and treatment may be recommended by an evaluating institution or physician.

R. **Resident:** means one of the following:

- a. An individual who participates in an approved Graduate Medical Education program, including programs in osteopathy, dentistry, and podiatry.
- b. A physician who is not in an approved Graduate Medical Education program, but who is authorized to practice only in a hospital, for example, individuals with temporary or restricted licenses, or unlicensed graduates of foreign medical schools.

S. **Source Individual:** any individual, living or dead, whose blood or other potentially infectious materials may be a source of exposure to an exposed person.

T. **Student:** any individual enrolled in a degree-granting program including NSU health profession students and visiting students.

U. **Universal precautions:** is an approach to infection control to treat all human blood and certain human body fluids as if they were known to be infectious for HIV, HBV, and other bloodborne pathogens, (Bloodborne Pathogens Standard 29 CFR 1910.1030(b)).

II. POLICY

It is the policy of NSU to a reasonable good faith effort to monitor all blood and/or body fluid exposures for proper medical treatment and follow-up, to take appropriate corrective actions to prevent recurrences, and to maintain documentation for compliance with Federal, State, and local laws.

Related NSU Policies:

- NSU Environmental Health & Safety Laboratory Safety Plan.
- NSU Bloodborne Pathogens Exposure Control Plan.

III. SCOPE OF IMPLEMENTATION:

- A. This policy is meant to cover anyone as defined in the introduction above who sustains an exposure to blood or body fluid that would define them as an **exposed person** in Section IV. Definitions.
- B. The method of dissemination and education regarding such policy shall be the responsibilities of the Department Chairs or their designee EHS Liaisons, the Program Directors for each residency and or health profession academic program, the Associate

Dean of Academic Affairs for students, and the Office of Environmental Health and Safety for those not directly under those areas. It is the intention that every person who may potentially be involved with occupational exposure of this type be aware of the basic policy and steps for management of occupational exposures.

- C. Positions of employment within NSU are categorized for the purposes of potential exposure to bloodborne pathogens. Employees in the positions deemed by the federal Occupational and Safety Administration (OSHA) to be at significant risk are offered and given Hepatitis B vaccinations at employer expense per the guidelines of OSHA. NSU Health profession students, visiting students, and NSU residents must be vaccinated for Hepatitis B and present serologic results before beginning their programs.
- D. It is the intention that exposures as described within this policy be reported and handled promptly and appropriately. No impediment to this process is to be tolerated and problems associated with such are to be reported to the Office of Environmental Health and Safety or other person(s) of responsibility for this policy within the Office of Environmental Health and Safety and the NSU Health Clinics.

IV. INTRODUCTION:

Post-exposure evaluation and initiation of prophylaxis therapy, if indicated, should be available to those who have sustained exposures to blood or body fluids that which may be infected with bloodborne pathogens. Those covered under this policy include employees, residents, and students including health profession students and visiting students.

V. PURPOSE

To provide timely post-exposure evaluation and follow-up to those sustaining exposure to potentially infectious blood or body fluids. This policy for post-exposure evaluation and follow-up attempts to make a reasonable good faith effort to ensure that measures are taken to minimize the risk of infection secondary to the exposure. Additionally, a reasonable good faith effort should be made to ensure that the circumstances surrounding the exposure are investigated and documented and that the exposed person receives medical consultation, follow-up, and treatment, if necessary, within a reasonable time period.

VI. REVIEW:

This policy is subject to review, update, and approval by the Office of Environmental Health and Safety and the NSU Health Clinics as required by changes in federal guidelines, Florida Statute, or institutional need.

VII. PROCEDURES

STEP 1: BLOODBORNE PATHOGEN EXPOSURE INCIDENT IMMEDIATE STEPS FOR EXPOSED PERSONS

Needle-sticks or lacerations/non-intact skin exposure

1. Wash the affected area thoroughly with soap and running water, if water is not available use alcohol. Betadine soap, not Betadine solution, is acceptable for this step.
2. Administer any necessary first aid.
3. If not allergic, disinfect affected area with Betadine solution.

Mucous Membrane Exposure

Rinse mucous membranes copiously with water, sterile saline, or sterile water.

STEP 2: EXPOSURE PROTOCOL

Exposure management including post-exposure prophylaxis shall be done according to the NSU Student Medical Clinic and NSU Employee Health Clinic Policies, in compliance with OSHA standard 1910.1030 and Florida Statute 381.004.

A. Procedures applicable to all exposure incidents:

The exposed person is to report the incident and the outcome of that initial evaluation as soon as possible to the EHS Liaison or the Office of Environmental Health and Safety. It is the responsibility of the exposed person to complete the appropriate online [Post Exposure Incident Form](#) located on the NSU Office of Environmental Health and Safety website at <https://www.nova.edu/ehs/index.html>, as soon as possible but in no event later than 24 hours after the exposure incident.

The post-exposure evaluation and follow-up should include these components:

- 1) The route and circumstances of the exposure shall be documented.
- 2) The identification of the source individual shall be documented unless it is infeasible or prohibited by state law.
- 3) The source individual shall be tested for HIV, HBV, and/or HCV, after any applicable consent is obtained, and according to Florida Statutes. Re-testing the source individual is not necessary when that individual is known to be positive for HIV, HBV, and/or HCV. Those results shall be disclosed to the exposed person and the exposed person shall be informed of required confidentiality requirements in accordance with Florida Statutes.

- 4) Serologic testing of the exposed person shall be offered within the provisions of Florida statutes for HBV and HIV. If the exposed person consents to baseline blood collection but chooses not to be tested for HIV at that time, the blood sample shall be held for 90 days after the exposure incident, enabling the exposed person to elect HIV testing within 90 days.
- 5) Post-exposure prophylaxis, when medically indicated.
- 6) Counseling and evaluation of the reported illnesses.
- 7) Individuals with exposures should keep their follow-up appointments with the NSU Student Medical Clinic or NSU Employee Health Clinic, as applicable.

B. Exposure within the NSU/NSU Health Clinics (Main Campus/ Sanford Ziff Building):

If the exposed person is within the local geographic work areas of the NSU Main Campus or NSU Health Clinics located at the Main Campus (Davie-Fort Lauderdale, FL) and during normal business hours, the exposure should be immediately communicated to the EHS Liaison within that College/NSU Health Clinic/Business Unit. If the exposed person cannot identify the EHS Liaison immediately, that person should ask for immediate help or direction from other responsible personnel. The EHS Liaison or other responsible person should immediately direct the exposed person to the NSU Student Medical Clinic or NSU Employee Health Clinic, as applicable. The exposed person should immediately identify themselves as having been exposed to a bloodborne pathogen and undergo a post-exposure evaluation and follow-up. If PEP is going to be recommended or initiated for an exposed person, it should be started in the timeframe suggested by current U.S. Public Health Service guidelines.

If the exposed person is a NSU employee, the employee shall contact the NSU Worker's Compensation representative at workerscomp@nova.edu and complete the First Report of Injury Form located on the NSU Worker's Compensation website at <https://www.nova.edu/risk/forms/workers-comp.pdf>. Treatments involving PEP for the exposed person and any possible future exposure-related diseases or disabilities for the exposed person shall not be the responsibility of NSU and/or NSU Health Clinics. These costs are to be covered under appropriate entities such as Worker's Compensation, Health Insurance, Disability Insurance, or the responsibility of the exposed person.

Because NSU health profession students and/or visiting students are not employees covered by Worker's Compensation, a First Report of Injury Form need not be completed.

In the case of a NSU health profession student, visiting student, or resident, his or her health insurance will be billed. The NSU student has exclusive responsibility for his or her own medical bills.

If the exposure occurs after work hours or an EHS Liaison or other responsible personnel within

the work area is not immediately available, the exposed person should proceed on their own to the ED for immediate and timely evaluation.

C. Exposure at a Health Facility other than the NSU Health Clinics on Main Campus:

When a person is exposed at a facility other than the NSU Health Clinics located at the Main Campus (Davie-Fort Lauderdale, FL), the exposed person should immediately report the incident to a person of responsibility at the location. Each office or facility dealing with healthcare or handling blood or body fluids should have its own procedures and policies for dealing with an exposure. If it is clear to the exposed person that the remote facility has no mechanism in place to deal with the exposure that includes evaluation by a trained medical professional, that person is to go to the nearest Emergency Department and request an initial and emergent evaluation for exposure to a bloodborne pathogen. These instances would most frequently involve a NSU health profession student or NSU resident assigned off-site.

D. Exposures Occurring at the Tampa Bay Regional Campus:

When an employee is exposed at any Tampa Bay Regional Campus location in Clearwater, the exposed employee should immediately report the incident to a person of responsibility at the location if the EHS Liaison or someone within the Office of Environmental Health and Safety is not immediately available. The exposed employee is to then go to the Workers' Compensation-contracted clinic, Concentra Urgent Care, 6170 Ulmerton Road, Suite 101, Clearwater, Florida 33760 and request an initial and emergent evaluation by a trained medical professional.

NSU Students or Residents experiencing an exposure event at the Tampa Bay Regional Campus location in Clearwater should immediately report the incident to a person of responsibility at the location if the EHS Liaison or someone within the Office of Environmental Health and Safety is not immediately available and should go to the nearest Emergency Department or qualified health clinic and request an initial and emergent evaluation for exposure to a bloodborne pathogen.

E. Exposures Occurring at the North Miami Beach Campus:

When an employee is exposed at the North Miami Beach Campus, the exposed employee should immediately report the incident to a person of responsibility at the location if the EHS Liaison or someone within the Office of Environmental Health and Safety is not immediately available. The exposed employee should proceed to the NSU Employee Health Clinic at the Davie campus and request an initial and emergent evaluation by a trained medical professional. If the incident occurs after hours, the exposed employee should go to the nearest Emergency Department and request an initial and emergent evaluation for exposure to a bloodborne pathogen.

When a student is exposed at the North Miami Beach Campus, the exposed student should immediately report the incident to a person of responsibility at the location if the EHS Liaison or someone within the Office of Environmental Health and Safety is not immediately available. The exposed should proceed to the NSU Student Health Clinic at the Davie campus and request an initial and emergent evaluation by a trained medical professional. If the incident occurs after hours, the exposed student should go to the nearest Emergency Department and request an initial and emergent evaluation for exposure to a bloodborne pathogen.

STEP 3: SOURCE INDIVIDUAL

If the exposure occurs within the confines of NSU /NSU Health Clinics located at the Main Campus (Davie-Fort Lauderdale, FL) it is the responsibility of the NSU Office of Environmental Health and Safety, the EHS Liaison or other responsible person available at the time of exposure to begin the assessment and evaluation of the source individual or source specimen according to protocol, if such source is identifiable.

Under circumstances where a source individual or known source individual's specimen is involved in an exposure incident, that source individual will be asked to submit to HIV and Hepatitis B and C testing. If the source individual is under the jurisdiction of NSU/NSU Health Clinics located at the Main Campus (Davie-Fort Lauderdale, FL), the testing will be done at no cost to the source individual. The cost is to be covered by the applicable College/Business Unit where the exposure occurred. Any diseases or disabilities discovered during testing of the source individual are not the responsibility of NSU and/or NSU Health Clinics, they are the responsibility of the source individual.

It is the responsibility of the EHS Liaison within that department/College/Business Unit to handle the steps surrounding the testing and follow-up with a source individual when an exposure occurs and assist the NSU Student Medical Clinic or NSU Employee Health Clinic with the post-exposure evaluation. If the exposed person cannot identify the EHS Liaison immediately, that person should ask for immediate help or direction from other responsible personnel to handle the issues surrounding a source individual when an exposure occurs and to assist the NSU Student Medical Clinic or NSU Employee Health Clinic with the post-exposure evaluation.

For example, the EHS Liaison or other responsible personnel should:

- Upon identification of the source individual, make arrangements to have the source individual's blood tested and to obtain the source individual's written consent for testing.
 - If the source individual is identified and present, the source individual should be asked to remain on-site for pre-HIV counseling and exposure protocol testing.
 - Inform the source individual of NSU policy of conducting testing of his/her

blood for HIV, HBV, and HCV, and request that he/she go with the student/employee to the NSU Student Health Clinic or NSU Employee Health Clinic, as applicable, for testing.

- If the source individual is known but not present, the source individual should be contacted by the EHS Liaison or other responsible personnel and asked to report to the NSU Student Health Clinic or NSU Employee Health Clinic, as applicable, for exposure protocol testing.
- If required by law and prior to testing for HIV, the source individual shall be provided an HIV testing consent form.
 - If the source individual is incapacitated, the source individual's family or guardian must be approached in order to obtain consent.
 - If the source individual refuses to consent, and/or if legally required consent for testing otherwise cannot be obtained from the source individual, this must be documented in writing.
 - All information concerning the performance of an HIV test and the results, or the source individual's refusal to consent to testing, shall be documented *only* in the medical record of the exposed individual – unless the source individual provides written consent to document this information in his/her medical record.
 - If the source individual is known to be infected with HBV, HCV, or HIV, testing for the source individual's known HBV, HCV, or HIV status need not be repeated. However, depending on the circumstances, additional confirmatory tests may be appropriate.
 - When the source individual's consent is not required by law, the source individual's blood, if available, shall be tested and the results documented.

VIII. DOCUMENTATION

A. Medical Records

The medical record details of an exposure incident and all associated testing, treatment, and follow-up by the NSU Employee Health Clinic shall be kept confidential and maintained for the duration of employment, plus 30 years. The details of an exposure and all associated testing, treatment, and follow-up by the NSU Student Medical Clinic shall be kept confidential and maintained for the duration of the student's academic program, plus 30 years. The medical records shall not be disclosed or reported without the employee's/student's express written consent to any person within or outside the workplace (except as may be required by law).

Otherwise, the medical records shall be provided upon request to the employee/student or anyone having express written consent of the employee/student. Such requests should be addressed to the NSU Employee Health Clinic and the NSU Student Health Clinic.

All employee/student medical records shall also be made available upon request for examination and copying to the OSHA Assistant Secretary and Director, or their designee.

These records shall include:

- The name of the exposed person.
- Hepatitis B Records:
 - A copy of the exposed person's hepatitis B vaccination status, including the dates of any the hepatitis B vaccinations and any medical records relative to the exposed person's ability to receive vaccinations.
 - If applicable, a copy of the exposed person's declination form.
- Post-Exposure Follow-Up Records:
 - A copy of all results of examinations, medical testing, and follow-up procedures following an exposure incident. Each exposure incident must be evaluated to determine if the case meets OSHA's Recordkeeping requirements in 29 CFR 1904, with the determination and the recording activities done by the NSU EHS Office.
 - A copy of the Healthcare Professional's Written Opinion from NSU Employee Health Clinic or NSU Student Medical Clinic.
 - A copy of the information provided to the healthcare professional providing the confidential medical evaluation.

B. Post-Exposure Incident Form

The NSU EHS Office is responsible for maintenance of the required [Post-Exposure Incident Form](#). These records must be kept **confidential** and must be maintained at the NSU EHS Office for at least the **duration of employment plus 30 years**. The Post-Exposure Incident Form shall not be disclosed or reported without the employee's/student's express written consent to any person within or outside the workplace (except as may be required by law).

Otherwise, the [Post-Exposure Incident Form](#) shall be provided upon request to the employee/student or anyone having express written consent of the employee/student. Such requests should be addressed to the Executive Director of Environmental Health, and Safety, at EHS@nova.edu.

All employee/student Post-Exposure Incident Form(s) shall also be made available upon request for examination and copying to the OSHA Assistant Secretary and Director, or their designee.

IX. SHARPS INJURY LOG

In addition to the OSHA Recordkeeping Requirements in 29 CFR 1904, all percutaneous injuries from contaminated sharps are also recorded in the Sharps Injury Log. The NSU EHS Office is responsible for recording all percutaneous injuries from contaminated sharps in the Sharps Injury Log, within fourteen (14) calendar days of receiving a report of a sharps injury. All incidences recorded in the log must include, at a minimum, the following information:

- The date of the injury;
- The type and brand of the device involved;
- The department or work area where the incident occurred; and
- 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 (5) years following the end of the calendar year that they cover. Any identified trend or concern may be further evaluated by a group comprised of individuals from the Office of Environmental Health and Safety, departmental supervisors, researchers, clinical users, and other NSU personnel as appropriate.

The information in the sharps injury log shall be recorded and maintained in such manner as to protect the confidentiality of the exposed person.

X. EVALUATION OF OTHER OSHA RECORDKEEPING AND REPORTING REQUIREMENTS

Each exposure incident must be evaluated to determine if the case meets any of OSHA's other recordkeeping and reporting requirements in 29 CFR 1904, with the determination and the recording activities done by the NSU Student Medical Clinic, NSU Employee Health Clinic and the Office of Environmental Health and Safety, as applicable.

XI. ADDITIONAL INFORMATION

The CDC maintains a 24-hour, seven days a week hotline called PEP line which offers health care providers around-the-clock advice on managing occupational exposures to HIV. Exposed individuals are encouraged to seek advice and direction from this source at any time, but may find it particularly helpful if there are questions in the immediate exposure period. The number for the CDC PEPline is **1-888 - 448 - 4911** to seek additional counsel or advice.

XII. COMPLIANCE CONTACT

If you would like further information on the NSU Post Exposure Policy for Management of Blood and Body Fluid Exposure, or have additional questions, please contact us via email at the Office of Environmental Health and Safety point-of-contact: EHS@nova.edu.

XIII. ENFORCEMENT

All employees having roles or responsibilities covered under this policy are expected to be thoroughly familiar with the policy and its procedures and obligations as they pertain to the employee’s role. Failure to comply with this policy may result in disciplinary action pursuant to all applicable university policies and procedures.

APPROVALS



3/28/2024

Executive Vice President & Chief Operating Officer

Date

Harry K. Moon, M.D.