

NOVA SOUTHEASTERN UNIVERSITY
CORPORATE COMPLIANCE POLICY

Post Exposure Policy & Procedure

POLICY NO. 1-3

Original Date: 01/13/00
Effective Date: 01/13/00
Revision Date: 02/22/07

PURPOSE: The purpose of this policy and procedure is to delineate individual responsibilities in the event of a significant exposure to blood and/or body fluids to a Nova Southeastern University (NSU) employee or non-NSU employee (see definitions).

POLICY: It is the policy of NSU 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.

PROCEDURE:

I. DEFINITIONS

A. Significant Exposure:

1. Exposure to blood and/or body fluids through needle stick, instruments, or sharps
2. Exposure of mucous membranes to visible blood or body fluids, to which Universal Precautions apply according to the Centers for Disease Control and Prevention, including but not limited to the following body fluids:
 - a. Blood
 - b. Semen
 - c. Vaginal secretions
 - d. Cerebro-spinal fluid (CSF)
 - e. Synovial fluid
 - f. Pleural fluid
 - g. Peritoneal fluid
 - h. Pericardial fluid
 - I. Amniotic fluid
 - j. Laboratory specimens that contain HIV
3. Exposure of skin to visible blood or body fluids, especially when the exposed skin is chapped, abraded, or afflicted with dermatitis or the contact is prolonged or involving an extensive area.

B. Source:

The person of origin for the blood and/or body fluid as outlined in I .A. above.

C. **Employee:**

An individual who has been assigned a NSU employee number and receives a University payroll check.

D. **Non-NSU Employee:**

This individual may be a student, agency employee, contract worker, North Broward Hospital District medical resident, or Palmetto General Hospital medical resident. This person does not have a NSU employee number and does not receive a payroll check from the University. Non-employees also include (but are not limited to) patients / visitors.

II. **RESPONSIBILITIES**

A. **Employees**

1. Report incident immediately to the supervisor for the department in which the exposure occurred.
2. Complete the **First Report of Injury or Illness -Workers Compensation Form (Exhibit 1) and the Employee Exposure Incident Form (Exhibit 2)** with the assistance of the supervisor and sign as directed to verify accuracy of information.
3. The supervisor shall verbally notify the Infection Control Coordinator's Office Ext.7353 and this office will notify Human Resources Workers Compensation Department, of the exposure incident and then fax a copy of the First Report of Injury Form to the Infection Control Officer .
4. The employee **shall immediately report** to the Infection Control Coordinators Office and complete the **First Report of Injury Form and the Employee Exposure Incident Report**. The Infection Control Coordinators Office is located on the third floor of the Dental Building in room 7353. The NSU Health Care Centers are located at 3200 South University Drive, Davie, FL, and 1750 NE 167th Street, North Miami Beach, FL. The hours of daily operation for the NSU Health Care Centers are:
 - Monday through Friday from 8:45 am - 5:00 pm
 - Saturday from 8:45 am - 1:00 pm.
5. **NSU Health Care Center/Davie:** For exposure incidents that occur between **5:00 pm and 7:00 pm Monday - Thursday** the employee shall immediately report with the completed First Report of Injury Form and Employee Exposure Incident Report to:
 - The Student Health Center located on the 1st Floor of the Sanford Ziff Building. Telephone Number (954) 262 - 1262.
6. **NSU Health Care Center/Davie:** For exposure incidents that occur **after 7:00 pm Monday - Thursday, after 5:00 pm on Friday, and after 1:00 pm on Saturday** the employee shall immediately report with the completed First Report of Injury Form and Employee Exposure Incident Report to:

- Westside Regional Hospital Emergency Room
8201 West Broward Blvd., Plantation, Florida
Telephone Number:(954) 473-6600.

7. **NSU Health Care Center/NMB:** For exposure incidents that occur **after 5:00 pm Monday - Friday, and after 1:00 pm on Saturday** the employee shall immediately report with the completed First Report of Injury Form and Employee Exposure Incident Report to:
 - The nearest Emergency Room for evaluation and/or treatment.
8. Pre-HIV test counseling of the exposed employee will be provided once it is established that a significant body substance exposure has occurred. Counseling of the employee will be provided by the NSU Health Care Center physician.
9. NSU employees must make the decision regarding post-exposure medical evaluation and testing, e.g., consent to test for Human Immunodeficiency Virus (**See Protocol E**) and consent for Chemoprophylaxis for Prevention of HIV Infection After Potential Occupational/Educational Exposure to HIV (**See Protocol C**).
10. In the event that the individual decides not to proceed with the Chemoprophylaxis for Prevention of HIV Infection he or she shall sign the declination section of the consent form (**See Protocol B**).
11. In the event that the individual decides not to proceed with the post-exposure evaluation, he or she shall sign the Employee Waiver of Post-Exposure Evaluation form (**See Protocol D**).
12. Employees are responsible for following-up on related exposure laboratory tests and immunizations as directed and counseled by the NSU physician.
13. Employees receive copies of Protocol A, B or C, NSU post exposure protocol and counseling and education informational handouts.

B. Non-NSU Employees

1. Report incident immediately to the supervisor where the exposure occurred.
2. Complete the **Non-NSU Employee Exposure Incident Report** with the assistance of the supervisor and sign as directed to verify accuracy of information (**See Form Exhibit 1 and Exhibit 2**).

3. In addition, agency employees and/or contract workers should also report the incident immediately to their employer. It is the agency or contract employer's responsibility to report the incident to the state.
4. The non-NSU employee shall report for medical assessment and treatment as directed by employer and/or school. If directed by employer and/ or school, to seek medical assessment and treatment at NSU Health Care Center, the non-NSU employee will participate in counseling session with the NSU physician.
5. Non-NSU employees must make the decision regarding post-exposure medical evaluation and testing, e.g., consent to test for Human Immunodeficiency Virus (See **Exhibit E**) and consent for Chemoprophylaxis for Prevention of HIV Infection After Potential Occupational/Educational Exposure to HIV (See **Protocol C**).
6. In the event that the individual decides not to proceed with the Chemoprophylaxis for Prevention of HIV Infection he or she shall sign the declination section of the consent form (See **Protocol B**).
7. In the event that the individual decides not to proceed with the post-exposure evaluation, he or she shall sign the Student/Non-NSU Employee Waiver of Post-Exposure Evaluation form (See **Exhibit D**).
8. Non-NSU employees are responsible for the follow-up of related exposure labs and immunizations as directed by designated medical personnel.
9. All bills for non-NSU employees will be the responsibility of the non-NSU employee.

C. NSU Students

1. All NSU students within the Health Professions Division are required to obtain and maintain health insurance. The student has exclusive responsibility for his or her own medical bills.
2. EXCEPTION FOR INITIAL EXPOSURE PROTOCOL VISIT AT A NSU HEALTH CARE CENTER ONLY:
If the initial post-exposure protocol (Protocol A) is performed at a NSU Health Center and the NSU physician is not the primary care provider under the student's health insurance, or the student does not have the required health insurance, the cost of the initial exposure protocol visit at a NSU Health Center, laboratory tests and 3 day supply of medications shall be the responsibility of the NSU academic college the student attends.

3. All subsequent follow-up visits shall be with the NSU student's primary care physician, and the student has exclusive responsibility for his or her own medical bills.

D. Infection Control Coordinator and/or Supervisor:

1. Assist in completing the **First Report of Injury Form and the Student or Non-NSU Employee Exposure Incident Report or Employee Exposure Incident Report**, where applicable. Assure that all information required is present and check that the correct form is completed. Be sure that all signatures are included.
2. Inform and fax the appropriate information for employees to the Office of Human Resources-Workers Compensation Department.
3. Initiate procedure to obtain Hepatitis and HIV tests on the source / patient of the blood or body fluid exposure. Inform source of NSU policy and request that he/she go with the student to the clinic for testing.
4. In the event that the patient refuses to consent for testing, the Infection control coordinator is to notify via telephone the NSU physician or the applicable Emergency Room physician.

E. Source/Patient

1. The source (patient) will be asked to report to the NSU Health Care Center for pre-HIV counseling and exposure protocol testing.
2. The source will be provided an HIV consent form (**See Protocol E**). If the source is incapacitated, the family must be approached in order to obtain consent.
3. The cost of the exposure laboratory tests for the source/patient shall be billed to the NSU college of the **NSU employee or of the NSU student**.
4. The source/patient's refusal to consent to an HIV test, and all information concerning the performance of an HIV test and its result, shall be documented only in the medical record of the exposed employee and/or non-NSU employee/student, unless the source/patient gives consent to entering this information on their medical record.

F. NSU Health Care Centers

1. Obtain and review the First Report of Injury Form or Student/Non-Employee Exposure Incident Form.

2. If the exposed individual is determined to have a non-significant exposure to blood and / or body fluids, the Exposure Protocol A will be so marked and the individual will sign the Exposure Protocol Record form and it will be witnessed by the physician (**See Protocol A**).
3. For NSU employees and non-NSU employees having a significant exposure to blood and / or body fluids, the NSU physician will complete the Exposure Protocol Record. This form documents if exposure is significant or not significant, pre-test counseling and recommended immunizations, laboratory work and follow-up. A copy of the completed form is given to the exposed individual and the original remains in the exposure record. All exposure-related records will be retained by the NSU Health Center for a minimum of 30 years in a separate file.
4. If an employee is determined to have a significant exposure to blood and / or body fluids, the NSU physician will notify the supervisor where exposure occurs to initiate the procedure to request consent on the source/patient of the blood and / or body fluid exposure if not already done so through the Infection Control Coordinator's office.

G. North Broward Hospital District Medical Residents:

1. Report incident immediately to the person in charge of the department where the exposure or needle stick occurred. In addition, the Family Medicine Residency Director should be notified of the incident.
2. Complete the First Report of Injury Form and Student/Non-Employee Exposure Incident Report with the assistance of the supervisor and notify the Infection Control Coordinator and sign as directed to verify accuracy of information.
3. NBHD medical residents exposed while at the hospital should report to Broward General Employee Health and if exposed while outside the hospital may report to a NSU Health Center on the Davie or North Miami Beach Campus for initial treatment and follow-up. The NSU Health Center(s) shall receive authorization from the NBHD Worker's Compensation Department.
4. In the event that the NSU Health Center(s), or Broward General Employee Health Department are closed, the medical resident should immediately go to the Broward General Emergency Room.

5. All follow-up treatment and /or laboratory tests shall be performed at the Broward General Employee Health Department at 1600 South Andrews Avenue, Fort Lauderdale, FL, 3316.

G. Palmetto General Hospital Medical Residents:

1. Report incident immediately to the person in charge of the department where the exposure or needle stick occurred. In addition, the Family Medicine Residency Director should be notified of the incident.
2. Complete the First Report of Injury with the assistance of the supervisor where the incident occurred and sign as directed to verify accuracy of information.
3. Immediately report to the Palmetto General Hospital Employee Health Department for initial exposure protocol and treatment. The Employee Health Office is located at 2001 West 68th Street, Hialeah, FL., # (305) 823-5000 ext. 3519. In the event the Palmetto General Hospital Employee Health Department is closed report to the Palmetto General Hospital Emergency Room.

III. TRACKING OF INCIDENTS

A. Infection Control Coordinator:

1. Responsible for on-going surveillance and monitoring of exposures for identification of trends and patterns and compliance with established policy.
2. Will establish corrective action plans and development of monthly report for employees and students.
3. Prepare and maintain the OSHA 300 Exposure Log for employees.
4. Maintain copies of all exposure incidents for the appropriate time.
5. Provide monthly report of student exposure incidents to University Risk Manager, and to the University Director of Compliance.

B. Workers Compensation

1. Maintain completed First Report of Injury Form for NSU employees.