

## ADMINISTRATIVE POLICY

- 1 It is the policy of OPTIONS to strive to eliminate or minimize worker exposure to tuberculosis and to adhere to licensing, state and federal regulations governing worker protection.
- 2 This policy sets forth the Occupational Exposure Plan to Tuberculosis of OPTIONS as required by OSHA. OSHA enforcement guidance is based on the guidelines for preventing the transmission of tuberculosis in health care settings issued by the Centers for Disease Control (CDC) in 1990.
- 3 Plan
  - 3.1 Requirements and methods of implementation: OPTIONS will adopt an Occupational Exposure Plan to Tuberculosis and feasible modifications necessary to remain in compliance with OSHA and other regulatory agencies. Policies and procedures will be implemented as specified herein. This exposure control plan will be integrated into the Policy and Procedure Manual. It will be reviewed as needed by the Safety/Infection Control Committee, Department of Human Resources and/or Quality Assurance Review Committee to assess compliance with current and evolving OSHA regulations and changes in exposure determination and institute changes as needed or desirable.
  - 3.2 A copy of this Occupational Exposure Plan will be located on the OPTIONS website. In accordance with Agency policy, employees may also request a copy of the plan from their supervisor.
- 4 Exposure Determination
  - 4.1 Prepare and update, as necessary, a determination of employees who face a greater incidence of TB infection. This determination contains the following:
    - 4.1.1 A list of all job classifications in which employees have an increased exposure to TB
    - 4.1.2 Interns working more than 20 hours per week, as cited in California Law.
  - 4.2 Probationary (new) employees: Protocol for early identification of individuals with active TB
    - 4.2.1 At the time of New Employee Orientation, employees will be notified of the requirement regarding the PPD skin test. The test

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must be received not more than six months prior to or seven days after employment. The employee is responsible for having the test read by a qualified health care professional within 48-72 hours of having the test. If staff do not have their test read within this period of time, they will be required to repeat the test.

- 4.2.2 Since there is no reliable way of distinguishing tuberculin reactions (positive PPD tests) caused by a previous BCG vaccine from those caused by TB infection, probationary employees with a history of BCG vaccination will be considered infected with tuberculosis and will be evaluated for TB disease and managed accordingly.
  - 4.2.3 Probationary employees who report a history of severe positive skin test reactions do not have to have the skin test repeated if there is written documentation of a previously positive reaction, or of completion of adequate preventive therapy, or of completion of adequate therapy for active disease.
  - 4.2.4 If the PPD skin test is negative, then no further testing of the employee is required.
  - 4.2.5 If the PPD skin test is positive, the employee must then have a chest x-ray to rule out the presence of active TB.
  - 4.2.6 If a probationary employee is diagnosed as having active TB, they become ineligible for employment. They will be counseled to obtain the necessary medical treatment and complete the proscribed treatment. Once they have completed the course of treatment and no longer have active TB, they can reapply for employment.
  - 4.2.7 If the probationary employee is diagnosed as having a TB infection, but not the disease, they will be counseled to receive the preventive therapy and be made aware of the symptoms of active TB.
  - 4.2.8 OPTIONS will be financially responsible for pre-employment skin testing and follow-up chest x-ray if indicated, but not for preventive therapy or treatment.
- 4.3 Regular employees: Protocol for early identification of individuals with active TB
    - 4.3.1 For individuals presently employed by OPTIONS, the agency will provide PPD skin testing free of charge to the employee as

recommended by the public health department. The employee is responsible for having the test read by a qualified health care professional within 48-72 hours of having the test. If staff do not have their test read within this period of time, they will be required to repeat the test.

- 4.3.2 An employee who is experiencing symptoms consistent with active TB will be directed for PPD skin test. The CDC has identified the symptoms to be: a chronic productive cough, coughing up blood, weight loss, loss of appetite, lethargy/weakness, night sweats, or fever. If TB is diagnosed, appropriate therapy should be instituted at no cost to the individual if it is determined to be work related.
- 4.3.3 Since there is no reliable way of distinguishing tuberculin reactions (positive PPD skin tests), caused by a previous BCG vaccination from those caused by TB infection, employees with a history of BCG vaccination will be considered infected with tuberculosis and will be evaluated for TB disease and managed accordingly.
- 4.3.4 In the event that an employee refuses a skin test or a chest x-ray when indicated, their continued employment will be evaluated.
- 4.3.5 Employees who report a history of positive PPD skin tests do not need to have the test repeated if there is written documentation of a previously positive reaction to the PPD skin test, or of completion of adequate preventive therapy, or of completion of adequate therapy for active disease.
- 4.3.6 Employees with previously known positive skin reactions followed by a documented chest x-ray that is negative do not need repeat chest x-rays regardless of the time elapsed since their negative chest x-ray. Repeat chest x-rays will be indicated only when an employee has symptoms suggestive of TB. Under these circumstances, OPTIONS will be financially responsible for the cost of the chest x-rays.
- 4.3.7 OPTIONS is not obligated to pay for the cost of a chest x-ray or treatment for an employee with a positive PPD skin test if the employee chooses to see their own physician of choice other than physician offered by OPTIONS.
- 4.3.8 Employees with a positive PPD skin test or with skin-test conversions on repeat testing or after exposure will be clinically evaluated for active TB. An individual with symptoms suggestive of

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TB will be evaluated regardless of skin test results. If TB is diagnosed, appropriate therapy will be instituted according to CDC guidelines. Employees diagnosed with active TB will be offered counseling.

- 4.3.9 If an employee is diagnosed with pulmonary or laryngeal TB, the employee will be excluded from work until adequate treatment is instituted, cough is resolved, and sputum is free of bacilli on three consecutive days.
  - 4.3.10 Employees with TB at sites other than the lungs or larynx will have their work assignments re-evaluated. Employees who discontinue treatment before the recommended course of therapy has been completed will not be allowed to work until treatment is resumed, an adequate response to therapy is documented, and they have negative sputum smears on three consecutive days.
  - 4.3.11 Employees with TB infection who cannot take or do not accept or complete a full course of preventive therapy do not need to be excluded from work, but will be counseled about the risk of developing TB disease and should be instructed to seek evaluation promptly if symptoms develop that may be due to TB.
- 4.4 Post Exposure Procedures: Requirements and methods of implementation
- 4.4.1 Following a report of an exposure incident, OPTIONS will make immediately available to the exposed employee, a confidential medical evaluation and follow-up without cost to the employee. Evaluation and follow-up will include:
    - 4.4.1.1 Documentation of the suspected routes of exposure.
    - 4.4.1.2 Circumstances under which the exposure occurred.
    - 4.4.1.3 Identification and documentation of source individual unless identification is not feasible. This information is confidential and will be given with the individual's permission only to those who need to know.
    - 4.4.1.4 When tuberculosis is diagnosed, the local health department will be notified by the diagnosing physician.

- 4.4.2 Procedure for Post-Exposure:

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- 4.4.2.1 In addition to skin test screening, employees will be evaluated as recommended by the public health department, if they have been exposed to a potentially infectious TB co-worker or program participant.
  - 4.4.2.2 Unless there has been documentation of a positive PPD skin test within the preceding three months, the exposed employee will receive a PPD skin test as soon as possible after exposure.
  - 4.4.2.3 If the initial PPD skin test is negative, the test will be repeated twelve weeks after the exposure.
  - 4.4.2.4 Exposed employees with PPD skin test reactions greater than 5 mm or with symptoms suggestive of TB will receive chest x-rays unless their baseline was 5 mm.
  - 4.4.2.5 Employees with previously known positive PPD skin-test reactions who have been exposed to an infectious co-worker or program participant do not require a repeat skin test or chest x-ray unless they have symptoms suggestive of TB.
- 4.4.3 Post-Exposure Medical Care: The employee will report to the Department of Human Resources; the employee will be directed to seek medical testing (PPD skin test) at a designated health care facility and given the following documentation to take with them:
- 4.4.3.1 A copy of OPTIONS Aerosol Communicative Disease Policies and Procedures (see policy # 200.2.16)
  - 4.4.3.2 all applicable worker's compensation forms.
  - 4.4.3.3 Any other relevant forms required by the designated health care facility.
- 4.4.4 Evaluation of exposure incidents:
- 4.4.4.1 Following an exposure, an evaluation of all the relevant policies and controls will be made to identify and correct any problems that may be found in order to prevent a recurrence of similar incidents.

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4.4.4.2 A Worker's Compensation Investigation form will be completed by the manager. The location and circumstances of the exposure will be specified on the report. The completed report will then be submitted to the Human Resources Director.

### 4.5 Record keeping

4.5.1 TB infections (positive TB PPD skin test) and TB disease, including baseline testing following an exposure that is determined to be related to employment, will be recorded on the OSHA 300 log. The log will be kept by the HR Director.

4.5.2 If an employee's TB infection has been entered on the OSHA 300 log and progresses to TB disease within five years, the original entry for the infection will be updated to reflect the new information.

4.5.3 A medical record is required for each employee listed on the Exposure Determination and will include:

4.5.3.1 Name and/or other identifying information

4.5.3.2 Copy of all results of examinations, medical testing, and follow-up procedures as required by this policy.

4.5.3.3 A copy of the health care professional's written opinion when required for follow-up exposure.

4.5.4 All medical records required by this policy will be kept confidential and will not be disclosed or reported without the employee's expressed written consent except as required by this policy or as may be required by law.

4.5.5 Medical records will not be part of an employee's personnel record. Records will be maintained for the duration of employment plus seven years.

4.5.6 Employee medical records required by this policy will be provided upon request for examination and copying to OSHA inspectors, the subject employee or to anyone having written consent of the subject employee in accordance with 29 CFR 1910.20.

4.5.7 Transfer of records: If it becomes necessary to transfer any records kept under this policy, the requirements of 29 CFR 1910 will be

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followed. If OPTIONS ceases to do business and there is no successor employer to receive or retain records, the employer will notify the Occupational Safety and Health Administration at least three months prior to their disposal and transmit them to the Occupational Safety and Health Administration if required to do so.

### 4.6 Environmental Controls:

4.6.1 OPTIONS provides a safe work environment for its employees including adequate controls to prevent TB transmission.

4.6.2 Ventilation systems at OPTIONS facilities meet local and state requirements.

4.7 Compliance: Ongoing compliance is assessed by the responsible persons herein.

## 5 Training:

5.1 Training will be delivered to all OPTIONS employees at the time during the New Employee Orientation or as soon as possible thereafter in order to ensure that staff know the hazards of TB transmission, its signs and symptoms, medical surveillance protocols, therapy/treatment, and specific controls used to halt the spread of TB. Training will be provided at no cost and during working hours.

5.2 Contents of training: The training program will consist of the following:

5.2.1 A general explanation of the causes, symptoms, and control of TB.

5.2.2 An explanation of the modes of transmission of airborne pathogens.

5.2.3 An explanation of the PPD skin test and the interpretation of its results.

5.2.4 An explanation of treatment for TB: the importance of compliance in drug therapy.

5.2.5 Procedures to follow if an exposure occurs, including method of reporting and medical follow-up that will be made available.

5.2.6 A suitable opportunity for employees taking the training to ask questions of the instructor.

5.3 Record keeping:

5.3.1 Requirements and methods of implementation

5.3.1.1 Training records will include the following information:

5.3.1.1.1 Dates of training sessions

5.3.1.1.2 Contents of training session

5.3.1.1.3 Name of person(s) conducting the training

5.3.1.1.4 Name and job title of all persons attending the training

5.3.1.2 Training records will be maintained by the Human Resources Director for three years from the date on which training occurred. Training records will also be entered into a training database.

POLICY DATE: May 1998  
REVISED: March 2004  
REVISED: August 2007  
REVISED: January 2011  
REVISED: May 2012  
REVISED: May 2014  
REVIEWED: September 2015  
REVISED: November 2016  
REVIEWED: October 2017, October 2018, March 2019  
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