BIOMEDICAL/EXPOSURE CONTROL PLAN

Policy
This policy sets out the protocols and procedures for the proper handling, storage, disposal and response to exposure to biomedical or infectious waste produced at Ultimate Medical Academy’s (UMA) ground campuses.

Purpose
To ensure the safety of UMA’s staff and students when handling and storing biomedical or infectious waste; and to ensure that UMA and its employees follow certain protocols and procedures for safe and responsible disposal of biomedical or infectious waste, as set out under Federal and State law.

Scope
Those employees of ground campuses who are in any way involved with Biomedical Waste (BMW).

Distribution:
The protocols and procedures within this policy must be distributed in writing to all students, faculty, and appropriate support staff who may come in contact with BMW.

Definitions
Biomedical Waste: Any solid waste or liquid waste which may present a threat of infection to humans. The term includes, but is not limited to, non-liquid human tissue and body parts, discarded sharps, human blood, human blood products, laboratory waste which contain human disease causing agents, and body fluids. The following are also included:

1. Used absorbent materials saturated with blood, body fluids, or excretions or secretions contaminated with blood, and absorbent materials saturated with blood or blood products that have dried. Absorbent material includes items such as bandages, gauze, and sponges.

2. Non-absorbent disposable devices that have been contaminated with blood, body fluids, or blood contaminated secretions or excretions and have not been sterilized or disinfected by an approved method.
Body Fluids: Those fluids which have the potential to harbor pathogens such as human immunodeficiency virus and hepatitis B virus. This includes lymph, semen, vaginal secretions, and cerebrospinal synovial, pleural, pericardial, and amniotic fluids. Body excretions such as nasal discharges, saliva, sweat, tears, urine, and vomitus shall not be treated as BMW unless visibly contaminated with blood.

Sharps: Objects capable of puncturing, lacerating, or otherwise penetrating the skin. Sharps include, but are not limited to: needles, lancets, microscope slides, and Vacutainer tubes.

Non-Sharps: Any item that does not satisfy the definition of sharps above, but comes into contact with body fluids or other BMW. These items include, but are not limited to: soiled gloves, empty urine collection cups, or gauze.

Responsibility
A “YES” is placed under “Procedures” for each department that has a role. If a department has no role, “N/A” is placed under “Procedures” for that department.

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Procedures

Segregation and Handling

1. BMW is identified and segregated from other waste at its point of origin into its proper container. The point of origin shall be the classroom in which the BMW is generated. Each classroom shall be equipped with leak-proof sharps containers, and a red impermeable bag “Red Bag” for the disposal of non-sharp BMW.

2. All sharps shall be discarded into leak-proof, puncture resistant containers located in the classrooms on each campus. The location of the sharps containers can be found in the following location at each campus:

   a. Tampa Campus:
      i. Room 108: Under the window.
   b. Clearwater Campus:
      i. Room 111: Near the first cabinet of the back counter.
      ii. Room 112: Near the fourth drawer by the sink.
      iii. Room 113: Under the sink.

3. All non-sharp BMW shall be disposed of directly into Red Bags. All. Red Bags shall be provided by the approved transporter listed in this policy. Red Bags are located in each classroom. At each campus, the location of the Red Bags can be found according to the following:

   a. Tampa Campus:
      i. Room 108: Under the window.
4. Any employee handling BMW shall wear minimum protective clothing, which must include gloves, uniforms, and a lab coat.

5. When filled, all sharps containers and Red Bags shall be sealed.

6. Bagged BMW being prepared for off-site transport shall be enclosed in a rigid type container provided by the approved transporter listed in this policy.

Storage

1. All onsite storage of BMW shall be in a designated area away from general traffic flow patterns and be accessible only to authorized personnel.

2. Storage of BMW shall not be for a period greater than 30 days. The 30-day time period shall commence when the 1st non-sharps item of BMW is placed into a Red Bags or sharps container, or when a sharps container containing only sharps is sealed.

3. All areas primarily used for the storage of BMW, other than the point of origin, shall be constructed of smooth easily cleanable materials that are impervious to liquids, vermin, and insect free, and maintained in a sanitary condition.

4. Outdoor storage areas and containers shall be secured from vandalism and shall be conspicuously marked with a minimum of six-inch diameter international biological hazard symbol.

Labeling
1. BMW shall be labeled prior to transport off-site at UMA. The label shall be securely attached or permanently printed on each bag and sharps container and be clearly legible and easily readable. The following information shall be included in the labeling:
   a. Facility name and address.
   b. The international biological hazard symbol.
   c. The phrase “Biomedical Waste” or “Infectious Waste”.

2. If a bag or sharps container is placed into a larger bag prior to transport, the label for the exterior bag shall comply with the labeling requirement above. The inner bags and inner sharps containers are exempt from paragraph these labeling requirement (1)(a).

3. The outer containers shall be labeled with the transporter’s name, address, registration numbers, and 24-hour phone number prior to transport.

**Transportation of BWM**

1. UMA is neither licensed nor equipped to transport or dispose of BMW and must use a registered BMW transporter as described in this section.

2. UMA’s registered BMW transporter is:

   Company name: **Stericycle, Inc.**
   Address: 13200 58th Street North, Clearwater, FL 33760
   Phone: Toll Free: 1-866-783 9816

   Registration number: **Florida Department of Health #: 7217**
   Place pick-up receipts are kept: **On Premises**

3. If UMA’s registered biomedical waste transporter is unable to transport UMA’s BMW, then the following registered biomedical waste transporter shall be contacted:

   Company name: **ProMed Waste Solutions**
4. In an emergency situation where a registered transporter cannot pick up UMA’s BMW, such as a natural disaster (i.e. hurricane,) all biomedical waste must be secured and stored in a secure room that will be chosen and identified by the Campus Director for each location. The room shall be cordoned off and locked until the waste can be picked up by a registered and licensed waste management transporter and the room decontaminated.

Training

1. All instructors or other employees who handle or come into contact with BMW at any UMA campus must receive BMW training prior to commencement of duties and be updated yearly. Employee training shall detail compliance with this operating plan and all applicable laws. The campus Program Director, or the Program Lead Instructor, shall be responsible for carrying out, or appointing someone to carry out training. The training must include the proper protocols and procedures of the following:

   a. Identification of BMW.
   b. Transport of BMW
   c. Segregation of BMW
   d. Handling of BMW (on-site)
   e. Treatment of BMW.
   f. Labeling of BMW.
   g. Use of protective clothing.
   h. Storage of BMW.
   i. Procedures for decontaminating BMW spills.
   j. Procedures and protocols in the event of a needle stick or other contaminated sharps injury.
   k. Contingency plan for emergencies.
2. The facility must provide documentation that employees have been properly trained. Documentation of employee training shall be recorded as set out in this policy and a copy placed in each employee’s file.

Procedures for Decontaminating BMW Spills

1. Surfaces contaminated with spilled or leaked BMW shall be decontaminated as part of the cleaning process. The following products and procedures must be used and carried out:

   a. The following personal protective equipment must be used during the cleanup process: gloves, disposable lab coat, goggles, and mask if applicable.

   b. Cavacide must be sprayed on the contaminated area/s and wiped up.

   c. All soiled items are to be bagged and to be placed in the biohazard containment box.

3. Non-BMW liquid waste created by these chemical disinfection operations shall be disposed of into a sewage system with excess water to dilute the chemical.

4. The disinfectants that are stored and may be utilized at the ground campuses are Cavacide and a 10:1 water and bleach solution.

5. Personal protective equipment, bleach, Cavacide spray bottles, and spill kits are located under all classroom sinks.

Prevention and Procedures for Needle Stick or Contaminated Sharps Injury

1. In the event of a needle stick or contaminated sharps injury, the employee must follow the procedures outlined in UMA’s needle stick policy. The needle stick policy, SOP-GEN-118, can be found on the Scoop.
2. The Director of Education shall annually review all sharps equipment used at the campuses to determine whether a safer medical device can be used. During the annual review, the Director of Education shall review the types of sharps involved in any prior injuries, which are recorded as per UMA’s needle stick policy.

**Operating Permit**

1. The UMA Facilities Department shall be responsible for acquiring a BMW generator permit for each campus that generates BMW. A permit must be attained even if that campus qualifies for the statutory exemption by producing less than twenty-five (25) pounds of BMW per month.

2. The records for that permit shall be stored and retained according to the records section below.

**Records**

1. BMW records shall include all invoices from BMW transportation service companies, records from employee training, permits, a sharps incident reports, and any other records kept or created in the course of administering this biomedical waste procedure.

2. All BMW records are kept for three (3) years and shall be available for review by the Department of Health.

3. BMW records shall be kept in a separate binder designated to each campus. The Director of Education shall store and manage the records. The Director of Education shall be the point of contact for any record requests by any Federal or State Department of Health for the records maintained under this policy.

**End of Procedure**

Procedures are maintained by the Campus Directors (ground) and Business Unit Owners (online) and reviewed with department managers to ensure proper implementation. Departmental managers...
are responsible for implementing and monitoring the procedures that pertain to their department and are responsible for training their staff.