



<b>University of Pennsylvania Police Department</b> 4040 Chestnut Street, Philadelphia, Pa 19104		 
<b>Directive:</b> 32	<b>Subject:</b> Occupational Exposure to Blood-Borne Pathogens	<b>Effective Date:</b> 12/01/1997
<b>Order of:</b> Gary Williams, Chief of Police		<b>Amended Date:</b> 08/01/2023

## I. Purpose

It is the purpose of this directive to provide University of Pennsylvania Police Department (UPPD) police officers with guidelines to minimize occupational exposure to blood-borne pathogens such as Human Immunodeficiency Virus (HIV) and Hepatitis B Virus (HBV).

## II. Policy

It is the responsibility of the UPPD to take all reasonable measures to allow its members to perform their duties in a safe and effective manner. The safe performance of daily operations is threatened by communicable diseases that can be contracted through exposure to infected blood and several types of bodily secretions. Therefore, it is the policy of the UPPD to continuously provide employees with information and education on the prevention of these diseases, provide up-to-date safety equipment and procedures that will minimize their risks of exposure and to institute post-exposure reporting, evaluation and treatment for all members exposed to communicable diseases.

## III. Scope

This directive affects all sworn police officers.

## IV. Definitions

- A. **Bodily Fluids:** Blood, semen and vaginal fluids or other secretions that might contain these fluids such as saliva, human breast milk, vomit, urine, feces or other bodily secretions.
- B. **Communicable Disease:** Those infectious illnesses that are transmitted through contact with the body fluids of an infected individual.
- C. **Occupational Exposure:** Reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of the officer's duties.

- D. Parenteral: Piercing mucous membranes or the skin barrier through such events as needle sticks, human bites, cuts and abrasions.
- E. Personal Protective Equipment: Specialized clothing or equipment worn by officers for protection against the hazards of infection. This does not include standard issue uniforms and work clothes without special protective qualities.
- F. Standard Precautions: Procedures promulgated by the Centers for Disease Control (CDC) and required by the federal regulations of the Occupational Safety and Health Administration (OSHA), standard 29 CFR 1910.1030 that emphasizes precautions based on the assumption that all blood and bodily fluids are potentially infectious of communicable diseases.
- G. Exposure Control Plan: A written plan developed by the UPPD and available to all employees that details the steps taken to eliminate or minimize exposure and evaluate the circumstances surrounding exposure incidents.

## V. Procedures

### A. General Disease Prevention Guidelines

1. The UPPD exposure control plan shall provide the overall strategy for limiting exposure to HIV, HBV, TB and other communicable diseases and responding to potential exposure incidents. The plan is available for review by all members through request of their immediate supervisor.
2. The UPPD subscribes to the principles and practices for prevention of disease exposure as detailed in the "standard precautions" prescribed by the CDC and the federal regulations of OSHA, standard 29 CFR 1910.1030. Where otherwise not detailed in this directive, officers shall be guided by these practices and procedures.

### B. Workplace Controls and Personal Protective Equipment

1. In order to minimize potential exposure, officers should assume that all persons are potential carriers of communicable diseases.
2. When appropriate protective equipment is available, no officer shall refuse to arrest or otherwise physically handle any person who may carry HIV, HBV TB or other communicable diseases.
3. Officers shall use protective gear under all appropriate circumstances unless the officer can demonstrate that in a specific instance, its use would have prevented the effective delivery of health care or public safety services or would have imposed an increased hazard to his/her safety or the safety of another co-worker.

- a. All such instances shall be reported by the officer and shall be investigated and appropriately documented to determine if changes could be instituted to prevent similar occurrences in the future.
4. Disposable gloves that comply as a Class I Medical Device shall be worn when handling any persons, clothing or equipment with bodily fluids on them.
5. Masks in combination with eye protection devices, such as goggles or glasses with solid side shields or chin-length face shields, shall be worn whenever splashes, spray, spatter or droplets of potentially infectious materials may be generated and eye, nose or mouth contamination can be reasonably anticipated.
6. Gowns, aprons, lab coats, clinic jackets, booties or other outer garments shall be worn as determined by the degree of exposure anticipated.
7. Plastic mouthpieces or other authorized barrier/resuscitation devices shall be used whenever an officer performs CPR or mask-mouth resuscitation.
8. All sharp instruments such as knives, scalpels and needles shall be handled with extraordinary care and should be considered contaminated items.
  - a. Leather gloves or their protective equivalent shall be worn when searching persons or places or dealing in environments, such as accident scenes, where sharp objects and bodily fluids may reasonably be encountered. Leather "cut-resistant" gloves that are lined with Spectra or Kevlar material are recommended. It is further recommended that officers wear disposable gloves OVER leather "cut-resistant" gloves when conducting searches.
  - b. Searches of automobiles or other places should be conducted using a flashlight, mirror or other devices where appropriate. Subsequent to a cautious frisk of outer garments, arrestees should be required to empty their pockets or purses and to remove all sharp objects from their person.
  - c. Needles shall not be recapped, bent, broken, removed from a disposable syringe or otherwise manipulated by hand.
  - d. Needles shall be placed in a departmentally provided, puncture-resistant, leak-proof "Sharps" container.
9. Officers shall not smoke, eat, drink or apply makeup around bodily fluid spills. Officers should avoid any hand-to-mouth, hand-to-nose or hand-to-eye contact.
10. Any evidence contaminated with bodily fluids shall be completely dried, bagged or containerized and clearly labeled "Biohazard" to identify potential or known communicable disease contamination.

### C. Disinfection

1. Any unprotected skin surfaces that comes into contact with bodily fluids shall be thoroughly washed as soon as possible with soap and lukewarm running water for at least 15 seconds before thoroughly rinsing and drying. (per “Guidelines for Prevention of Transmission of Human Immunodeficiency Virus and Hepatitis B Virus to Health-Care and Public-Safety Workers” published by the U.S. Department of Health and Human Services, Public Health Service, Centers for Disease Control, Atlanta, Georgia).
  - a. An anti-microbial solution may be used where soap and water are unavailable.
  - b. Disposable gloves should be removed carefully and hands and forearms should then be washed.
  - c. Skin surfaces shall be washed and mucous membranes flushed as soon as feasible following the removal of any personal protective equipment.
  - d. Hand lotion should be applied after disinfection to prevent chapping and to seal cracks and cuts on the skin.
  - e. All open cuts and abrasions shall be covered with waterproof bandages before reporting to duty.
2. Disinfection procedures shall be initiated whenever bodily fluids are spilled or an individual with bodily fluids on his/her person is transported in a UPPD vehicle.
  - a. The transporting officer shall notify his/her supervisor and the vehicle shall be taken out of service for disinfection as soon as possible.
  - b. The officer shall disinfect the vehicle as follows:
    - 1) Any excess bodily fluids should first be wiped up with disposable absorbent materials. The materials should first be soaked in disinfectant (see below).
    - 2) A freshly prepared solution of one (1) part bleach to ten (10) parts water or a fungicidal/mycobactericidal disinfectant shall be used to clean the area or equipment.
3. Non-disposable equipment and areas upon which bodily fluids have been spilled shall also be disinfected as outlined above in Subsection 2., b.

### D. Housekeeping

1. All equipment and environmental and work surfaces must be cleaned (using a freshly prepared solution of one (1) part bleach to ten (10) parts water; or a

fungicidal/mycobactericidal disinfectant) and decontaminated after contact with blood and other potentially infectious materials as provided in this directive.

- a. Facilities and Real Estate Services (FRES) and Environmental Health and Radiation Safety (EHRS) shall be contacted to clean any potentially infectious material spills that occur on University property or within University buildings. This notification will be documented on the S & R.
2. Broken and potentially contaminated glassware, needles or other sharp instruments shall not be retrieved by hand but by other mechanical means (i.e. dust pan and brush) and shall be placed in a "Sharps" infectious waste container for disposal.
3. Officers shall remove clothing that has been contaminated with bodily fluids as soon as possible. Any contacted skin area shall be thoroughly cleansed in the prescribed fashion.
4. Contaminated laundry shall be bagged in a red "Biohazard" bag or containerized at the location where it is removed but shall not be sorted, rinsed or cleaned at that location.
  - a. The bagged contaminated laundry shall be sealed and clearly labeled "Biohazard." The UPPD's laundry service should be contacted to retrieve and clean the contaminated laundry.
5. ONLY employees specifically designated by EHRS shall discard actual or potentially contaminated waste materials. All such disposal shall conform with established federal, state and local regulations.

#### E. Custody and Transportation of Prisoners

1. Officers should not put their fingers in or near any person's mouth unless necessary to do a finger sweep (used ONLY to clear an obstructed airway), and then only while wearing protective equipment.
2. Individuals with bodily fluids on their persons may be required to wear a suitable protective covering if he/she is bleeding or otherwise emitting bodily fluids.
3. Officers should transport persons in a vehicle equipped with a solid shield or partition, if available, to prevent the spread of airborne communicable diseases.
4. Officers have an obligation to notify relevant support personnel during a transfer of custody when the suspect has bodily fluids present on his/her person, or has stated that he/she has a communicable disease.
5. Officers shall include on the Incident Report when a person taken into custody has bodily fluids on his/her person or has stated that he/she has a communicable disease. Officers will not transmit over UPPD radio specific information relating to the specific communicable disease(s) a person may be inflicted with.

6. In the event of contact with a transgender individual who is in the possession of a needle, which is purported to be for hormonal use, the officer shall request the documentation from the physician confirming that the above described is being used for legitimate medical treatment.
7. In the event of a needle stick, with the hormone, UPPD officers shall follow the vaccination, exposure, evaluation and treatment procedures listed in Section G. of this directive.
8. Surgical masks may be placed on a prisoner, as circumstances dictate and/or for officer safety.

#### F. Supplies

1. UPPD management is responsible for continuously maintaining an adequate supply of personal protective equipment in a convenient location for all affected personnel under their supervision. This includes, but is not limited to, ensuring that:
  - a. personal protective equipment in appropriate sizes, quantities and locations are available;
  - b. hypoallergenic gloves and other materials are available for those who are allergic to materials normally provided, and cleaning, laundering and disposal, as well as repair or replacement of these and other items is provided; and
  - c. first aid supplies and disinfecting materials are readily available at all times.
2. All UPPD marked vehicles shall be continuously stocked with the following communicable disease control supplies:
  - a. Personal protective equipment in appropriate size and quantity for affected personnel to include face and eye protective devices, coveralls, disposable gloves and booties, leather gloves, puncture-resistant and leak-proof containers for needles and other sharp objects, barrier resuscitation equipment and leak-proof plastic "Biohazard" bags.
  - b. Disposable towelettes (70% isopropyl alcohol).
  - c. Waterproof bandages.
  - d. Absorbent cleaning materials.
  - e. Surgical mask.
3. Officers using supplies stored in their assigned vehicles are responsible for ensuring that they are replaced as soon as possible.

4. Patrol officers are required to keep at least two pairs of disposable gloves and their issued CPR mask on their person while on duty.
5. Supervisors are responsible for continuously maintaining an adequate supply of disease control supplies for members of their shift/unit.

G. Vaccination, Exposure, Evaluation And Treatment

1. All employees of the UPPD shall be provided with the opportunity to take the HBV vaccination series to prevent the spread of the hepatitis B virus at no cost to the employee. Interested employees should contact the Hospital of the University of Pennsylvania's Occupational Medicine.
  - a. If an affected UPPD employee declines to take the vaccination series, they shall be required to sign a waiver form.
  - b. The signed waiver form shall be maintained in the employee's personnel file.
2. Any officer who has unprotected physical contact with blood or other bodily fluids of another person while in the line of duty shall be considered to have been potentially exposed to blood-borne pathogens.
3. In cases of exposure, a supervisor shall be contacted who shall complete an Incident Report and a Commonwealth of Pennsylvania, "Employer's Report of Occupational Injury or Disease" Form (LIBC-344) and shall take appropriate steps to document the means and circumstances under which the exposure occurred.
  - a. The above reports shall be completed and submitted to the UPPD Records Unit prior to the end of the reporting supervisor's tour of duty.
4. Immediately after exposure, the officer shall be transported to Occupational Medicine for tests of evidence of infection and treatment of any injuries.

Note: Employees experiencing work related injuries/ illnesses shall normally be examined and treated by HUP emergency services. Follow-up appointments will be handled by Occupational Medicine (0800-1545 hours, Monday through Friday). **Employees whose injuries/ illnesses constitute an "emergency hospital case," shall be handled in accordance with UPPD Directive 31, "Hospital Cases."**

- a. The UPPD shall ensure continued testing of the officer for evidence of infection and provide psychological counseling as determined necessary by medical staff.
- b. The officer shall receive a copy of the health care provider's written opinion and any conditions resulting from the exposure that require further evaluation or treatment.

- c. Unless disclosure to an appropriate University official is authorized by the officer or by state law or federal law, the officer's medical evaluation, test results and any follow-up procedures shall remain confidential.
5. Any person responsible for potentially exposing a member of the UPPD to a communicable disease shall be encouraged to undergo testing to determine if the person has a communicable disease.
  - a. The person shall be provided with a copy of the test results and requested to consent to release a copy of the test results to the exposed UPPD officer. The officer shall be informed of applicable laws and regulations concerning the disclosure of the identity of infectious status of the source individual.
  - b. Criminal charges may be sought against any person who intentionally exposes a UPPD officer to a communicable disease.
6. Officers who test positive for HIV and HBV may continue working as long as they maintain acceptable performance and do not pose a safety and health threat to themselves, the public or other members of the UPPD.
  - a. The UPPD shall make all decisions concerning the officer's work status solely on the medical opinions and advice of Occupational Medicine or medical staff.
  - b. The UPPD may require an officer to be examined by Occupational Medicine to determine if he/she is able to perform his/her duties without hazard to the officer or others.
7. All members of the UPPD shall treat employees who have contracted a communicable disease fairly, courteously and with dignity.

#### H. Recordkeeping

1. Occupational Medicine shall maintain an accurate record for each employee with occupational exposure that includes the following:
  - a. information on vaccination status;
  - b. the results of all examinations, tests and follow-up procedures;
  - c. the health care professional's written opinion; and
  - d. any other relevant information provided by the health care professional.
2. These health care records shall be retained by Occupational Medicine for thirty (30) years beyond termination date in accordance with University Policy #201 "Records-Confidentiality."



I. Training

1. The UPPD shall ensure that all UPPD members whose duties potentially expose them to communicable diseases are provided with a complete course of instruction on prevention of blood-borne diseases prior to initial assignment or within ten (10) days thereafter.
2. All affected employees shall receive annual refresher training through Environmental Health and Radiation Safety (EHRS).
3. The UPPD's designated First Aid Instructor shall ensure that complete records are maintained on member training to include information on the dates and content of training sessions, names and qualifications of persons conducting the training and the names and job titles of all employees attending the training sessions. These records shall be maintained for a minimum of three (3) years from the training date.

J. Compliance

Violations of this directive, or portions thereof, may result in disciplinary action.

K. Officers Assigned to Other Agencies

Officers of this department assigned to or assisting other law enforcement agencies will be guided by this directive.

L. Application

This directive constitutes departmental policy, and is not intended to enlarge the employer's or employee's civil or criminal liability in any way. It shall not be construed as the creation of a higher legal standard of safety or care in an evidentiary sense with respect to third party claims insofar as the employer's or employee's legal duty as imposed by law. Violations of policy will only form the basis for departmental administrative sanctions. Violations of law will form the basis for civil and criminal sanctions in a recognized judicial setting.