

Bloodborne Pathogens Guidance for Principals & SESAs

User Guide for:

Principals & Site Employee Safety Administrators (SESAs)

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What is The Bloodborne Pathogens Standard?

Citation: 29 CFR 1910.1030

Purpose: To prevent the transmission of bloodborne pathogen diseases within workplace occupations with potential exposure.

Law in effect: This law has been in effect since 1992.

Who is covered: All NYCDOE employees whose job tasks bring them into routine contact with blood and other potentially infectious materials.

What is required: The NYCDOE is required to develop a written Exposure Control Plan and Cleaning Schedule; identify employees who are at risk; train at-risk employees each year on bloodborne pathogen diseases; provide protective equipment; offer Hepatitis B vaccinations to at-risk workers; ensure that universal precautions are practiced; provide prompt evaluation and treatment to workers who have had a needle stick or other exposure to blood and adequately dispose of medical waste.

Who is responsible: The Principal is responsible for school compliance. Site Employee Safety Administrators (SESAs) have been appointed by the principal to coordinate compliance activities. The Division of School Facilities is responsible for Custodian Engineers and the Office of School Food Nutrition Services is responsible for kitchen employees

Who enforces this law: THE New York State Department of Labor, Public Employee Safety and Health Bureau (PESH). Fines may be levied for sites found not in compliance.

DOE Schools: Each school principal must develop a program to protect employees who have occupational exposure to blood and other potentially infectious materials (OPIM). Annual compliance dates are published in the Principal's Weekly and schools are held accountable for these tasks through two questions on the Annual Compliance Checklist.

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What are Bloodborne Pathogens?

Bloodborne pathogens are micro-organisms present in human blood and can cause bloodborne diseases such as HIV/AIDS, Hepatitis B and Hepatitis C, Syphilis and Malaria. These pathogens are spread via:

- Blood.
- Through body fluids that are visibly contaminated with blood. These include tears, feces, urine, nasal secretions, sputum, saliva, sweat and vomit; and
- Other Potentially Infectious Materials (OPIM). The following human body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures.

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Who is Responsible for Compliance?

The NYC DOE utilizes a multi-division coordinated effort. Participants are listed below.

Participant	Role
Office of Occupational Safety & Health	Develops and oversees the agency-wide program; supports schools, tracks employee Hepatitis B vaccinations.
Office of General Counsel	Represents the DOE to the Attorney General's Office
Office of Compliance Services	Measures school compliance
Div. Of Instruction and Informational Technology DIIT	Manages data flow in BBPCT between Galaxy, BBPCT, Learning Times and Schools
Principal	Responsible for school compliance
Site Employee Safety Officer (SESA)	Coordinates the BBP program at the school
Office of School Food & Nutrition	Monitors compliance of Kitchen staff
Division of School Facilities	Ensure the training of Custodian Engineers
Staff	Complete annual BBP training, comply with requirements of the standard, report exposure incidents. Accept or decline offer to receive the HBV and schedule series

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What is the Bloodborne Pathogens Compliance Tool (BBPCT)?

The BBPCT is an interactive database, used by schools to comply with state requirements and track compliance levels. Principals and Site Employee Safety Administrators can access it via the DOE workspace site.

BBPCT sends automatic email notifications to employees, keeps records, and provides options for eligible employees to be administered the hepatitis B vaccination series. Guidance documents and informational materials are available.

In BBPCT, Principals and SESAs can:

- Get an instant account of their overall compliance status.
- Place employees into categories of risk exposure to blood and OPIM.
- Upload group training data and track the training status of at-risk employees.
- Track the vaccination status of eligible employees.
- Customize Site Specific Exposure Control Plans.
- Customize the Cleaning Schedules for the Medical and diaper Change rooms.



- Record incidents which exposure employees to blood and OPIM.
- Download compliance reports; and
- Request program support

Accessing the Bloodborne Pathogens Compliance Tool (BBPCT)

Principals and SESAs can access BBPCT here: <https://www.nycenet.edu/bbp>

1. View the [BBPCT User Manual here](#);
2. If you have access problems, please contact the IT Service Desk at 718-935-5100 or <https://supporthub.schools.nyc/request>
3. If you experience technical issues with BBPCT or require accommodation, please contact BBPquestions@schools.nyc.gov and provide a brief description of the problem and a screenshot of any issue you encounter.

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What is a Site Employee Safety Administrator (SESA)?

The principal selects a staff in GALAXY to be the point-of-contact for all bloodborne pathogens (BBP) related tasks and communications. The Site Safety Employee Safety Administrator (SESA) functions on behalf of the principal to fulfill the school's obligations to the Bloodborne Pathogens Standard. A principal may select up to two SESAs.

The ideal SESA must:

- a. Know the responsibilities of each staff member.
- b. Can identify which employees have roles that put them at-risk for Bloodborne pathogens.
- c. Have administrative authority; and
- d. Be readily accessible during work hours.

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How is a SESA Designated?

Deadline: September 30, 2024

Principals designate SESAs in GALAXY. If principals have previously identified one or more SESAs, they must still verify these staff to ensure that the correct individual(s) is/are named.

To select a SESA in GALAXY:

1. Once you are logged on, you will see your school's Table of Organization.
2. Select an administrator to whom you want to assign the SESA role *by right-clicking* on the icon next to the name.
3. Click the ASSIGN ROLES option on the menu.
4. Click BBP (do not make any ARIS changes).
5. Click the select the "Site Employee Safety Administrator" checkbox.



6. Click SAVE.
7. You will see a confirmation screen with the role change, click CONFIRM to verify.
8. Click OK.

Note: Employees who are “*not on Payroll*” cannot be selected as a SESA.

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What are the BBP Program Compliance Tasks?

To comply with the State regulations, principals and SESAs must complete the following tasks. For details on each of the following, see *SESA’s Responsibilities*.

1. Complete the SESA training for Bloodborne Pathogens - **ASAP**.
2. Conduct Employee Exposure Determination by **October 18, 2024**.
3. Train high-risk Employees by **November 8, 2024**.
4. Complete the Exposure Control Plan (ECP) by **October 18, 2024**.
5. Develop Cleaning Schedules by **October 18, 2024**.
6. Provide the protocol for receiving the Hepatitis B Vaccinations for Staff - **Ongoing**.
7. Provide Personal Protective Equipment (PPE) - **Ongoing**.
8. Follow up with Employees who experienced an Exposure Incident - **Ongoing**.
9. Keep records - **Ongoing**

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DOE Compliance Deadlines

Principals identify a SESA: September 30, 2024

SESA identifies at-risk employees – October 18, 2024

Complete the Exposure Control Plan: October 18, 2024

Complete the Cleaning Schedule: October 18, 2024

Train at-risk employees: November 8, 2024

Note: The summary count on the Home Page reflects real time data. Changes to the school’s Table of Organization, i.e., new employees, will affect the school’s compliance status until they are placed into a risk category. If any tasks remain outstanding after the deadline, an automated non-compliance email will be sent to Principals and SESAs each Tuesday.

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How can I Check my School’s Compliance Status?

The Home Page in BBCT lists the status of each compliance requirement for the Bloodborne Pathogens Standard in real time data. The addition of new or transfer employees can quickly change your completion

status. For example, new employees will affect the school's compliance status until they are placed into a risk category.

Any compliance tasks remaining outstanding after the deadline will trigger an automated non-compliance email to Principals and SESAs each Tuesday.

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What are the SESA's Responsibilities?

1. Complete SESA Training - **ASAP**

SESAs and Principals are required to attend a 1-hour web-based training session that will explain the SESA responsibilities in detail. SESAs log in to LearningTimes to view the one-hour SESA webinar that can be viewed 24/7 (NOT on a mobile device).

- The SESA training is different from the employee webinar. Participating in a school sponsored group training does not fulfill the SESA or Principal training requirement.
- The SESA training is only available through www.learningtimes.net/bbp
- SESAs are NOT able to update their own, their Principal's or other SESAs' training status in BBPCT. They can only update staff training records. LearningTimes updates SESA training status in BBPCT.

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2. Conduct Employee Exposure Risk Determination - **October 18, 2024**

Using BBPCT, SESAs must place all employees into categories of exposure-risk to blood and OPIM. All employees must be identified as either at-risk or not-at-risk of bloodborne pathogens exposure.

Note: The GALAXY system updates each school's Table of Organization daily in BBPCT. Any changes to an employee's work status e.g. transfers, retirements, email addresses, leave status must be made directly in GALAXY. These changes cannot be made in BBPCT.

Category A – Employees with higher risk

These employees have been pre-identified risk and schools cannot make changes to the Category assignment. Contact OOSH for assistance with change designations. Due to their expected job tasks, Category A employees have work-related risk all the time regardless of frequency. In BBPCT, these employees appear on a red background. These employees include School Nurses, SESAs, Principals, Occupational Therapists and Physical Therapists, and District 75. For incorrect classifications, contact OOSH at BBPquestions@schools.nyc.gov

Category B - Employees with risk

Using a drop-down menu, SESAs must identify whether the remaining staff members are responsible for certain risk tasks. For returning staff that were previously designated, the SESA should review these designations from last year to ensure that the employees' responsibilities remain the same. Category B employees appear on a yellow background.

These employees are expected to perform a high-risk task some of the time and are selected based on the performance of the following tasks:

- a. Designated first-aid/CPR responder.
- b. Provide routine health care, for example:
 - Health Paraprofessionals and 1:1 Paraprofessionals.
 - Speech Therapists who manipulate students' mouths.
 - Adaptive Physical Education Teachers who engage with physical contact with students.
 - School Aides who work with the developmentally disabled.
- c. Provide bathroom care including Universal Pre-K staff.
 - May also include D79 LYFE staff
- d. Substitute Paraprofessionals

Category C - Employees without risk

These employees do not perform any of the high-risk tasks listed in Categories A or B. They have no work-related risk and are not required to receive mandated training. They will also not be able to access the LearningTimes webinar. For returning staff who were previously identified as not-at-risk, the SESA should confirm that such designation continues to be correct for the current school year. Category C employees appear on a yellow background.

Note: SESAs must routinely check BBPCT regularly throughout the school year to categorize any newly hired staff.

Note: SESAs may change employees from Category B to C and vice versa. Please contact OOSH for misidentification/change of Category A employees.

Note: Any compliance tasks remaining outstanding after the deadline will trigger an automated non-compliance email to Principals and SESAs each Tuesday.

SUMMARY OF RISK CATEGORIES IN BBPCT				
	CATEGORY A	CATEGORY B	CATEGORY C	UNIDENTIFIED
RISK LEVEL	Higher Risk	Risk	Without Risk	Not Yet Determined
EXAMPLE	SESAs Principals Nurses D75 employees Occupational Therapists Physical Therapists	<ul style="list-style-type: none"> • OFNS Staff • Perform a task such as: <ol style="list-style-type: none"> a. First aid/CPR. b. Routine health care. c. Bathroom care services. • Substitute Paras 	General Staff	New Staff
ACTION	Pre-selected by BBPCT; SESAs cannot change this category	SESAs can designate B and C categories		
TRAINING	Require annual training		Do NOT require training	If Categorized as B
VACCINATION	Will receive a hepatitis B vaccine offer		Not eligible for hepatitis B vaccination	If Categorized as B

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3. Train High Risk Employees - **November 8, 2024**

All at-risk staff must receive annual BBP training by the compliance deadline. Staff must be given time during their normal work hours to attend the training and must receive training no later than November 8, 2024.

Note: The standard at 29 CFR 1910.1030(g)(2)(i) requires that such training *"...be provided at no cost to the employee and during working hours."*

Employees placed in Categories A & B will receive an email about their training obligations 24 hours after they have been identified in BBPCT and they will receive 3 email reminders. The online seminar training can be done individually via the email link sent to each employee or as a group organized by the school's SESA. 24 hours after completion of the webinar, staff will receive a Training Completion Certificate and their records will be credited.

Note: Category C employees are not required to receive annual training and will not be able to access the LearningTimes webinar.

To view the webinar:

- This course is accessible using a Windows, Mac, or iPad platform but not from a cell phone.
- Employees must be released during their regular work hours to take the 45-minute webinar.

- c. Employees will need to log in using their 7-digit Employee Reference ID and **NOT** their File number. Place 0 in front of a 6-digit ID number.
- d. 24 hours after training, employees will receive a completion notification.

Group Training

If schools conduct group training, SESAs will be required to update employees' training status in BBPCT. Until then, training reminder emails will be sent to employees.

The group-training link, [BBP Staff Group Training](#) is provided on the Training Page of BBPCT as well as at the end of this document. In BBPCT, SESAs can print an attendance sheet and upload group-training data using Excel. Refer to the BBPCT User Manual in the Resources section for detailed information.

SESAs are required to routinely check their school's compliance status in BBPCT to capture new hires. The school can easily track training compliance from the Home Page in BBPC

Note: Since Category C employees are not required to complete the training, they will not receive training directive emails, be able to access the webinar, nor receive a vaccine offer. However, they may participate in a group training, but not for credit.

Note: Any compliance tasks remaining outstanding after the deadline, will trigger an automated non-compliance email to Principals and SESAs each Tuesday.

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4. Complete the Exposure Control Plan (ECP) - October 18, 2024

Each school must have an ECP that contains school-specific information about how the school will comply with State regulations. The plan is custom-made for your school by completing the prompts provided in BBPCT.

If an ECP was completed last year, you will need to review it to ensure that all designations remain applicable for the coming school year. You will be required to certify that the information is correct via a check box. Schools with sub-sites must complete an ECP for each site before the certification box can be checked and the plan printed. [Posted completed ECPs on the school's Health and Safety Bulletin Board.](#)

Note: Any compliance tasks remaining outstanding after the deadline will trigger an automated non-compliance email to Principals and SESAs each Tuesday.

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5. Develop Cleaning Schedules - OCTOBER 18, 2024

Cleaning Schedules outline when and how the Medical and Diaper Change Rooms are cleaned and maintained for bloodborne pathogens according to State regulations. If you completed a Cleaning Schedule last year, you would still need to review it to ensure all designations remain applicable for



the coming school year. In consultation with the School Custodian, you can develop a cleaning schedule specific to your school in BBPCT.

Schools with sub-sites must complete a Cleaning Schedule for each site before they can check the certification box. **Post completed Cleaning Schedules in each Medical and Change Room.**

Note: Any outstanding compliance tasks remaining after the deadline will trigger an automated non-compliance email to Principals and SESAs each Tuesday.

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6. Hepatitis B Vaccinations

After training, eligible employees (those who completed the training and never received the vaccination) will receive a vaccine offer within 24 hours via email. They must accept or decline.

In BBPCT, SESAs can view which employees have responded. The Employees must notify Principals and SESAs of their vaccination schedules. SESAs should arrange for these staff members to be excused from school for this time away and no time should be deducted from their CAR.

From the Staff Home Page:

- a. Staff who have not begun the vaccine series, can decline/accept the offer here:
<https://www.nycenet.edu/bbp/>
- b. Staff who have already begun the vaccination series, can discontinue any further doses
<https://www.nycenet.edu/bbp/>
- c. Staff wishing to repeat the vaccination series can upload a physician's note here:
<https://www.nycenet.edu/bbp/>
- d. Employees who retire before completing the vaccine series should contact OOSH at
BBPquestions@schools.nyc.gov

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7. Provide Personal Protective Equipment (PPE) - Continuous

Each school must provide disposable gloves and other protective equipment (disposable aprons and sleeves for D75) and make them available to employees at no cost. PPE must be specific to the task being performed. Please ensure that an adequate supply of non-latex gloves in varying sizes is available.

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8. Post Exposure Follow-up – Continuous.

Employees who have been exposed to blood, OPIM, or needle sticks must be offered the opportunity to receive medical attention free of charge and they must be released to do so. Medical expenses are reimbursable through the DOE Medical Bureau, Claims Unit.



Category A and B staff can report an exposure incident from the Staff Home Page here: <https://www.nycenet.edu/bbp/>

For all other employees, SESAs must record all exposure incidents in BBPCT: *Exposure Incidents*

For each exposure incident:

- a. Log the exposure incident in BBPCT.
- b. Advise the exposed employee of his/her rights – Refer to the Exposure Incident Package in the Resources section of BBPCT.
- c. Release the employee to seek medical attention during the affected work shift.
- d. Complete the SH900.2 form and update the SH900 Log.

Refer to the *Exposure Incident Package in the Resources* section of BBPCT for more information.

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9. Recordkeeping - Continuous

Keep attendance sheets from group training and retain medical records on-site for the length of employment plus 30 years and training records for 3 years.

The BBPCT keeps these records:

- a. Employee risk categories,
- b. Employee training and vaccination,
- c. Vaccine acceptance and declination,
- d. All email notifications,
- e. Identifies the person making any data adjustments

Make records available to representatives from PESH and the employee representative with the employee's consent.

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Health and Safety Bulletin Board

The following items should be posted in the Health and Safety Bulletin Board: See the Resources Section in BBPCT.

- a. The Exposure Control Plan
- b. The Standard Universal Precautions poster
- c. The Protect Yourself poster
- d. Smart Work Practices fact sheet
- e. Handling Medical Waste fact sheet
- f. Bloodborne Pathogens Facts for Employees with Risk fact sheet
- g. Post the Cleaning Schedule in the named rooms

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SESA Resources and Quick Links

Accept/Decline the Hepatitis B Vaccine:	https://www.nycenet.edu/bbp
BBPCT Access:	https://www.nycenet.edu/bbp
BBPCT Troubleshooting:	Please contact BBPQuestions@schools.nyc.gov and provide a brief description of the problem and/or a screenshot of any issue you encounter.
BBPCT User Manual	BBPCT User Manual
FAQs for SESAs	SESA FAQs
FAQ for School Staff	Staff FAQs
BBP Webinar:	www.learningtimes.net/bbp This webinar must be viewed during the employee’s normal work hours. This course is accessible from a Windows, Mac or iPad platform; but, not on a cell phone. To receive training credit, log-in with the 7-digit Employee Reference ID found on paystub and NOT the Employee File number.
DOE Medical Bureau:	Claims Unit 65 Court Street, Room 209 Brooklyn, New York 11201
Employee Attendance Sheets:	See BBPCT—Training Tab. Refer to the BBPCT User Manual for detailed information.
Exposure Incident Package:	Resources Section in BBPCT - BBP Exposure Incident Package
GALAXY Help Desk:	718-935-4444
Group Training:	This link is also on the Training Page in BBPCT or use this link: BBP Staff Group Training
Resources Section, BBPCT	A complete listing of informational materials
IT Related Issues	<ul style="list-style-type: none"> • IT Service Desk: 718-935-5100 • IT Online Service Desk: https://supporthub.schools.nyc/request
Reimbursement	Hepatitis B Vaccination Reimbursement Form (SIPP)

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