

POLICY – BLOOD BORNE PATHOGENS
UG and PG Medical Education

Approved by:	UME & PGME
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I. PURPOSE

1. The Doctor of Medicine and Post Graduate Medical Education programs at the Schulich School of Medicine & Dentistry at Western University support a safe learning environment in collaboration with the school's affiliated health care institutions. This policy, grounded in provincial and national best practices, outlines the school's process for managing risks related to blood borne diseases in clinical training.
2. This policy applies to all applicants, medical students, residents, and fellows at the School.

II. DEFINITIONS

1. The following terms have the following meanings:

Affiliate: means the healthcare institution where Learners are placed for clinical training as part of their education experience.

Applicant: means an applicant to the School.

Associate Dean: means the Associate Dean Undergraduate Medicine or Associate Dean of Post Graduate Medicine as applicable in the context.

Blood borne disease: means a disease caused by a microbiologic agent capable of being transmitted to another person via contact with the blood of an infected individual. Most notably, in Canada, this includes the human immunodeficiency virus (HIV), hepatitis B virus (HBV), and hepatitis C virus (HCV).

Expert Panel: means a panel created under this policy from faculty who have expert knowledge in the field of blood borne pathogens and that fulfills the functions outlined in this policy.

Exposure-prone procedures (EPP): means invasive procedures where there is the potential for direct transmission of virus between the Caregiver through an accidental needle stick injury (usually a hand, finger or thumb) of the physician via a sharp instrument, needle tips, or sharp tissues (spicules of bone or teeth) while delivering patient care in body cavities, wounds, or in poorly visualized, confined anatomical sites during surgical or assessment procedures.

Learner: means a medical student, resident, or fellow at the School.

Learners: means medical students, residents, or fellows at the School.

LEW Office: means the Learner Equity and Wellness Office at the School.

Non-exposure prone procedures (NEPP): means procedures where the hands and fingers of the physician worker are visible and outside of the body always and there is no active bleeding by the care-giver and/or procedures/examinations that do not involve risk of possible injury to the health-care worker's hands by sharp instruments and/or tissues. This is with the overall proviso that routine universal infection prevention and control procedures are adhered to always.

Examples of such NEPP include:

- the drawing of blood
- setting up and maintaining intravenous lines or central lines if there has been no skin tunneling and the procedure is performed in a non-exposure prone manner
- minor suturing on the surface of the body
- the incision of external abscesses or similar lesions
- routine oral, vaginal or rectal examinations

Routine Practices and Additional Preconditions: means the *Provincial Infectious Diseases Advisory Committee's Document: Routine Practices and Additional Precautions in All Health Care Settings*, as amended and updated from time to time:

https://www.publichealthontario.ca/en/eRepository/RPAP_All_HealthCare_Settings_Eng2012.pdf

School: means the Schulich School of Medicine and Dentistry at Western University.

III. APPLICANTS' OBLIGATIONS

1. Applicants will be:
 - (i) aware that they will be required to participate in the care of patients with various communicable diseases or infections including blood borne diseases;
 - (ii) required to comply with the School's Hepatitis B immunization policy and this policy; and
 - (iii) ethically responsible, upon acceptance, to inform the LEW Office if they are positive for a blood borne disease. The Associate Dean may consult with the Expert Panel or other experts as appropriate and confidentiality of the Applicant's state of health will be maintained to the greatest extent possible.

IV. LEARNER'S OBLIGATIONS

1. Learners must:
 - (i) Know their serological status with respect to blood borne diseases;
 - (ii) Be in a state of health such that they may participate in the academic programs, including patient care, without posing a risk to themselves or others;
 - (iii) Comply with the School's Hepatitis B Immunization policy and this policy;
 - (iv) Comply with the Provincial Communicable Diseases Surveillance Protocol, Blood-Borne Diseases Surveillance Protocol for Ontario Hospitals, developed under the Public Hospitals Act, Regulation 965;
 - (v) Use Routine Practices and Additional Precautions in order to prevent the spread of blood borne diseases and other infections;
 - (vi) Declare to the LEW Office prior to enrollment in curriculum and the start of Year 3 course Clerkship, their personal antibody status for Hepatitis C and HIV.

- (vii) If Hepatitis B surface antibody negative, declare to the LEW Office their Hepatitis B surface antigen and core antibody status; and
- (viii) Prior to entrance in **any** clinical learning curriculum, be Hepatitis B immune, if known to be Hepatitis B surface antigen negative. If a Learner is persistently antigen negative in spite of recurrent vaccine, the matter will be reviewed by an Expert Panel.

V. LEARNERS INFECTED WITH A BLOOD BORNE DISEASE

1. Learners infected with a blood borne disease have the following obligations:
 - (i) Inform the LEW Office if they are or test positive for a transmissible blood borne disease. If a positive antibody was detected, declare the most recent respective Hepatitis C or HIV viral load to the LEW Office
 - (ii) Pursue their studies only if their continued involvement does not pose a health or safety hazard to themselves or others;
 - (iii) Have their condition reviewed and monitored by an Expert Panel at the request of the Associate Dean.
 - (iv) Submit documentation to the Expert Panel as reasonably required for it to understand the health status of the Learner and to develop an accommodated learning plan.
 - (v) Comply with an accommodated learning plan, as developed by an Expert Panel and approved by the Associate Dean, who will review all Learners with a positive test for Hepatitis B, Hepatitis C, or HIV. Submit documentation to the LEW Office of ongoing adherence to treatment bi-annually, in cases of Learners with HIV, Hepatitis B or C and a viral load who are on chronic antiretroviral therapy.
 - (vi) As a legal requirement of licensure for PGE learners, declare their blood borne disease status to the College of Physicians and Surgeons of Ontario (CPSO), if they engage in procedures as outlined by the CPSO, as a matter of licensure.
 - (vii) Disclose to their supervisor if they accidentally expose a patient to their blood borne disease in a clinical setting.

IV. LEARNERS AT HIGH RISK

1. Learners with certain medical conditions that place them at a higher risk of complications if they are exposed to a blood borne pathogen may:
 - (i) Inform the LEW Office of their medical condition;
 - (ii) Submit documentation to the Expert Panel as reasonably required for it to understand the health status of the Learner and to develop an accommodated learning plan if appropriate;
 - (iii) Comply with an accommodated learning plan, as developed by an Expert Panel and approved by the Associate Dean;

- (iv) Learners who seek accommodation under this section because of their vaccination status must take immediate steps to come into compliance with Schulich Medicine & Dentistry UME policies regarding vaccinations.

II. LEARNERS WHO ARE POTENTIALLY EXPOSED TO A BLOOD BORNE DISEASE

1. Learners who are potentially exposed to a blood borne disease have the following obligations:
 - (i) Seek medical attention as soon as possible after the event;
 - (ii) Report and document the occurrence to the LEW Office and the Associate Dean as soon as possible; and
 - (iii) Follow post-occurrence testing and treatment as required by the Expert Panel or Associate Dean.

V. SCHOOL'S OBLIGATIONS

1. The School will:
 - (i) Maintain confidentiality to the greatest extent possible regarding any information disclosed by students concerning their serological status and disclose relevant information only with the appropriate consent.
 - (ii) Ensure there is communication from LEW to the Associate Dean on Learners requiring accommodated learning plans for blood borne pathogens.
 - (iii) Provide education and training to all Learners in appropriate methods to prevent the transmission of communicable diseases, including blood borne diseases, for EPP and NEPP that are consistent with Routine Practices and Additional Precautions.
 - (iv) Advise all post graduate Learners engaging in EPPs of the need to strictly adhere to the CPSO's requirements for testing for blood borne pathogens and for reporting positive results, as outlined in the CPSO Policy on Blood Borne Viruses.
 - (v) Require all undergraduate Learners who are Hepatitis B Antibody and Antigen negative and Hepatitis C and HIV serology negative to undertake and report repeat serology testing to the LEW Office prior to entering any course clerkship.
 - (vi) Create an accommodated learning plan for a Learner who tests positive for a blood borne disease that respects and maintains the privacy of the Learner but supports patient safety. This accommodated learning plan will be generated collaboratively involving input from the Learner, the School and the Expert Panel.
 - (vii) Provide education and training to a Learner who tests positive for carriage of a blood-borne disease on appropriate methods to prevent transmission of blood borne diseases to patients and other

- professionals.
- (viii) Provide accommodated learning plan to the Learner's supervisor and educate the supervisor so that they understand the plan and how it should be implemented.
 - (ix) Provide, in collaboration with the Affiliate, any and all supports for clinical instructors in meeting a Learner's accommodated learning plan for EPP.
 - (x) Monitor Learner compliance with any and all accommodated learning plan for EPP.
 - (xi) Advise the Learner's supervising physicians of the EPP accommodations required for the Learner.
 - (xii) Report to the Affiliate any issues arising that suggest non-compliance with the accommodated plan and any proposed investigation and necessary action.
 - (xiii) Form an Expert Panel created from faculty who have expert knowledge in the field of blood borne pathogens and review such membership periodically.

VI. EXPERT PANEL

1. The Expert Panel will:

- (i) Meet for the sole purposes of advising the LEW Office and applicable Associate Dean on Learner accommodation necessary for individual clinical curriculum when a Learner is found to be antigen positive for a viral pathogen listed in Schedule "A" to this policy.
- (ii) Be convened at the request of the applicable Associate Dean or LEW Office.
- (iii) Include individuals who have expertise in: the identified Learner's curriculum and/or post graduate provider's specialty (if applicable); Infection Prevention and Control; Infectious Diseases; Hematology and/or Hepatology (with expertise in viral hepatitis and/or HIV infection); Public Health; Bioethics; Occupational Medicine; Hospital administration; and/or legal expertise.
- (iv) Allow a Learner under review to make such submissions to the Expert Panel and to appear before the Expert Panel prior to the panel making its recommendation to the Associate Dean.
- (v) Review adjudicate and make recommendations on matters referred to it.
- (vi) Develop and advise on an accommodated learning plan for a Learner with a blood borne disease and recommend same to the Learner and the Associate Dean.

- (vii) Communicate the personal health information of a Learner to School leaders and faculty on a need to know basis.

VII. ASSOCIATE DEAN

1. The Associate Dean will make the decision on the appropriate accommodated learning plan for a particular learner following receipt of recommendations from the Expert Panel. The Learner shall be afforded the opportunity to meet with the Associate Dean and to submit documentation for consideration within the deadlines set by the Associate Dean. In making such a decision, the Associate Dean may consult a third-party expert to review and deliver an opinion on the accommodated learning plan developed by the Expert Panel. Such opinion may be used by the Associate Dean in altering or upholding the plan recommended by the Expert Panel.

VIII. SCHEDULE A

- Hepatitis B
- Hepatitis C
- HIV