UE: COFM Blood Borne Viruses Policy

This policy is an evidence-based consensus document developed by an expert working group on behalf of the six Ontario medical schools and faculties. The policy closely complies with current evidence contained within the SHEA guideline for Management of Healthcare Workers Who Are Infected with Hepatitis B Virus, Hepatitis C Virus, and/or Human Immunodeficiency Virus\(^1\) as well as the College of Physicians and Surgeons of Ontario (CPSO) Blood Borne Viruses policy\(^2\). This policy applies to all students attending an Ontario medical school who participate in clinical activities in Ontario.

Definitions

**Applicant:** an individual applying for admission to medical school that has not yet been accepted.

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

**Exposure-prone procedures:** “Invasive procedures where there is the potential for direct contact between the skin (usually a hand finger or thumb) of the physician and sharp instruments, needle tips, or sharp tissues (spicules of bone or teeth) in body cavities, wounds, or in poorly visualized, confined anatomical sites.”\(^3\)

**Medical Student:** an individual who has been accepted to medical school.

**Non-exposure prone procedures (NEPP):** “Procedures where the hands and fingers of the physician worker are visible and outside of the body at all times and procedures or internal examinations that do not involve possible injury to the health-care worker’s hands by sharp instruments and/or tissues are considered NEPP, provided routine infection prevention and control procedures are adhered to at all times.”\(^4\)

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\(^2\) [http://www.cpso.on.ca/policies-publications/policy/blood-borne-pathogens](http://www.cpso.on.ca/policies-publications/policy/blood-borne-pathogens)


Examples of such NEPP include:

- the drawing of blood
- setting up and maintaining intravenous lines or central lines provided that 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

**Applicants will be:**

- aware that they will be required to participate in the care of patients with various communicable diseases or infections including hepatitis, HIV and AIDS;
- required to comply with Faculty/Program Hepatitis B immunization and blood borne pathogen policies and requirements;
- required, upon acceptance, to inform the Associate/Assistant Dean of Undergraduate (UG) Medicine if they are positive for a blood borne virus. The Associate/Assistant Dean of UG Medicine may consult with the Expert Board/Board of Medical Assessors or other experts as appropriate. Confidentiality concerning the applicant’s state of health will be maintained to the greatest extent possible.

**The Medical/Health Sciences Faculty will:**

- provide education and training to all students in appropriate methods to prevent the transmission of communicable diseases, including blood borne viruses, that is consistent with *Provincial Infectious Diseases Advisory Committee’s Document: Routine Practices and Additional Precautions in All Health Care Settings*;
- maintain confidentiality to the greatest extent possible regarding information disclosed by students concerning their serological status and disclose relevant information only with the appropriate consent.

**Medical Students are:**

- likely to participate in exposure-prone procedures. Students are therefore obligated to know their serological status with respect to blood borne viruses and, if seropositive, to report their status to the appropriate Associate/Assistant Dean as per their program’s policy. It is in a student’s best interest to be tested and, if
necessary, to receive proper treatments that are highly effective at reducing viral
load or even curing some forms of blood borne viral infections while also
maintaining quality of life.

- expected to 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
  (see COFM’s Policy on Essential Skills for Medical Students). As such, if a
  student’s serological status is unknown, the Faculty/Program may make
  curricular changes to ensure patient safety which may affect the student’s ability
to participate in patient care activities.

- obligated to comply with Faculty/Program Hepatitis B immunization policies and
  requirements, where documented evidence of a complete series of hepatitis B
  immunizations, in addition to testing for antibodies to HBsAg (Anti-HBs) at least
  one month after the vaccine series is complete, is required (see COFM’s
  Immunization Policy).

- mandated to comply with the Provincial Communicable Disease Surveillance
  Protocol, Blood-Borne Diseases Surveillance Protocol for Ontario Hospitals,
developed under the Public Hospitals Act, Regulation 965.

- required to use Routine Practices and Additional Precautions in order to prevent
  the spread of blood borne viruses and other infections.

- required to disclose, as per school policy, if they are potentially exposed to a
  blood borne virus in a clinical setting; and provide a blood specimen, if indicated.

Medical Students infected with Blood Borne Viruses:

- are professionally and ethically obligated, on acceptance, to inform the
  appropriate Associate/Assistant Dean;

- may pursue their studies only as long their continued involvement does not pose
  a health or safety hazard to themselves or others; it is expected that, with a
  combination of effective treatments that reduce the viral load and some
  modification to their program of study, all students can be accommodated as
  needed to reduce the risks of blood borne pathogen transmission to allow
  successful completion of their studies;

- may have their condition reviewed and monitored by an Expert Board at the
  request of the Associate/Assistant Dean. The review panel may include
  individuals who have expertise in the infected provider’s specialty or
  subspecialty, Infection Prevention and Control, Infectious Diseases and/or
  Hepatology with expertise in viral hepatitis and/or HIV infection, Public Health,
  Bioethics, Occupational Medicine, and/or hospital administration; and, an
  individual with legal expertise;
• may have clinical duties or clinical exposure modified, limited or abbreviated based on recommendations from an Expert Board regarding the details of the modifications or limitations – particularly as it relates to the performance of exposure prone procedures and the status of the blood borne infection (i.e. viral loads etc);

• required to disclose if they accidentally expose a patient to their blood borne virus in a clinical setting;

• must be offered advice and counseling that will assist him/her regarding clinical practice and career choices; and

• have the right to appeal decisions made by the Associate/Assistant Dean or the Expert Board by submitting, in writing or in person, a proposed amendment to the decision and the rationale supporting such an amendment. The student may submit additional documentation from his/her personal physician or other healthcare provider in support of their appeal. In the case where the student’s appeal is rejected by the Associate/Assistant Dean and/or Expert Board, the student may engage in the Student Appeal Procedure of the University to submit any additional appeals.

**Medical Students who are potentially exposed to a blood borne virus are:**

• required to seek medical attention as soon as possible after the event as per faculty and organizational policy (e.g. within 1-2 hours for HIV post-exposure prophylaxis);

• required to report and document occurrence as per faculty and organizational policy;

• required to follow post-occurrence testing and treatment.

**General Recommendations**

1. Students should not be prohibited from participating in educational experiences solely on the basis of their blood borne virus status.

2. Subject to the precautions below, the affected student may perform routine physical examinations provided there is no evidence of open or healing wounds, or eczema on the student’s hands as per Routine Practices.

3. If the skin of the hands is intact, and there are no wounds or skin lesions, then in examining a body orifice, whether oral, vaginal, or rectal, the student must wear gloves as per Routine Practices.
4. If the skin on the hands is not intact, whether from a healing laceration, or from any skin condition interfering with the normal protection afforded by intact skin, and is to the extent that could not be covered with a simple dressing then the affected student should not provide direct patient contact until they have received effective treatment.

5. A decision as to whether an affected student should continue to perform a procedure which in itself is not exposure prone should take into account the risk of complications arising which might necessitate the performance of an exposure prone procedure.

6. It is recognized that infection control precautions are not perfect. However, based on the nature of NEPPs and the agent specific guidelines outlined in this document, it is expected that the risk of a transmission event occurring is low and if an event were to occur, remedial action can further minimize the risk to the patient.

7. Due to the nature of undergraduate medical education, it is likely that all medical students will be involved in exposure-prone procedures. It is therefore required that the implementation of these policies at Ontario medical schools be guided by the principles and procedures as articulated by the CPSO’s Blood Borne Viruses Policy that stipulates that “Physicians who want to perform or assist in performing exposure prone procedures in Ontario must be tested for HCV, HIV and HBV, if they haven’t been confirmed immune to HBV, before they commence performing or assisting in performing exposure prone procedures in Ontario. This includes physicians who perform or assist in performing procedures that may become exposure-prone (for example, a laparoscopic procedure that may convert to an open procedure) and also includes physicians who have the potential to perform or assist in performing exposure prone procedures in the course of providing day-to-day care (e.g., emergency medicine physicians) even though they may not be currently performing them.”

http://www.cpso.on.ca/policies-publications/policy/blood-borne-pathogens
For additional information on the following topics, please see the SHEA guideline for Management of Healthcare Workers Who Are Infected with Hepatitis B Virus, Hepatitis C Virus, and/or Human Immunodeficiency Virus (https://www.shea-online.org/images/guidelines/BBPathogen_GL.pdf):

- Summary Recommendations for Managing Healthcare Providers Infected with Hepatitis B Virus (HBV), Hepatitis C Virus (HCV), and/or Human Immunodeficiency Virus (HIV)

- Categorization of Healthcare-Associated Procedures According to Level of Risk for Bloodborne Pathogen Transmission
  
  o Category I: Procedures with a minimal risk of bloodborne virus transmission

  o Category II: Procedures for which bloodborne virus transmission is theoretically possible but unlikely

  o Category III: Procedures for which there is definite risk of bloodborne virus transmission or that have been classified previously as “exposure-prone”