



**Child and Adolescent Health Center (CAHC)  
Waste Management and Exposure Control  
Content Relevant to: CAHC and SWP Models**

**Waste Management and Exposure Control**

**CAHC MPR #15** The health center staff shall follow all Occupational Safety and Health Act guidelines to ensure protection of health center personnel and the public.

**SWP MPR #20** The SWP shall follow all Occupational Safety and Health Act guidelines to ensure protection of SWP personnel and the public.

The Child and Adolescent Health Center (CAHC) program and School Wellness Program (SWP) are legally required to comply with the complete Michigan Occupational Safety and Health Administration (MIOSHA) guidelines for waste management and exposure control. The fiduciary is responsible for staff training and overall adherence to MIOSHA guidelines throughout the agency, including the CAHC and SWP sites. While there are several standards required by MIOSHA, the CAHC program highlights five specific program requirements for evaluating adherence:

- Policy and procedures for waste disposal (site-specific)
- Policy and procedures for exposure plan (site-specific)
- Current medical waste license, which is posted onsite
- Evidence of appropriate waste disposal
- Safety Data Sheet (SDS) location posted and is accessible

Regarding the policies and procedures (P&Ps) for waste disposal and exposure plan, the fiduciary can meet requirements through the following options: 1) use existing fiduciary P&Ps and include CAHC and/or SWP site-specific procedures as an addendum; 2) create site-specific waste disposal and exposure P&Ps; or 3) create a CAHC manual containing site specific waste disposal and exposure plans.

## **Waste Management**

Evidence of appropriate waste handling and disposal is a program requirement. The following are the required components:

- Waste is stored in appropriately labeled containers securely attached to the wall at or above hip level
- Waste containers are labeled with the date the container was put into use, as well as the expiration date (e.g., large quantity generator 90 days and small quantity generator 180 days)
- Any collected waste waiting for pick-up is stored in appropriate containers and biohazard label in a secure area (e.g., locked collection box in a leak proof bag and cardboard box with weekly monitoring log present)
- Waste manifest logs are kept onsite for three years
- An up-to-date Certificate of Registration as a Medical Waste Producing Facility is posted

Consider the following best practices when reviewing your site's Waste Disposal P&P:

- Who is responsible for waste collection, storage, and disposal procedures?
- What procedures are maintained in collecting and storing waste?
- What documentation is completed regarding waste collection, storage, and disposal and who will do the documenting?

## **Exposure Control**

The fiduciary exposure control plan for bloodborne pathogens should set forth universal precautions, engineering controls, regulated waste disposal, laundry handling (if applicable), post-exposure and vaccination follow-up, hazard communications, record keeping, information and training aimed at protecting employees from the health hazards to be compliant with MIOSHA requirements.

MIOSHA standards are a program requirement. The CAHC and SWP program will review the fiduciary exposure control plan to assure general compliance with these standards by examining the following requirements:

- Appropriate PPE for staff
- A spill kit on-site for spill containment
- SDS sheets available for hazard exposures in the CAHC and/or SWP site
- Eyewash station or alternative available for eye exposures to blood or chemical hazards
- MIOSHA safety posters hung in employee accessible areas
- Appropriate labeling and storage of hazardous containers within the CAHC
- Employee accessible P&Ps for handling workplace exposures and exposure prevention (falls, chemicals, blood, etc.), reviewed at minimum annually to reflect technology changes and reduce exposure to work hazards

Consider the following best practices when reviewing your site's Exposure Plan P&P:

- What actions do staff take to clean up spills at site?
- What actions do staff take for accidental exposures at the site?
- What exposure prevention methods are used at the site?
- What equipment is available in the event of an accidental exposure?

## **Waste Management and Exposure Plan Resources**

[MIOSHA A to Z Standards List](#) See the list below for relevant standard practices for CAHC and SWP:

- Bloodborne Pathogens – MIOSHA Requirements for Medical Offices
- Doctor's Dentist's Office – Checklist, YouTube Video
- Eyewash Facilities
- Personal Protective Equipment
- HBV/HIV
- Influenza
- Posters
- Safety Data Sheets
- Stickers
- Waste

## **Waste Management and Exposure Plan References**

[Michigan Department of Environmental Quality Epinephrine Auto-Injector Disposal Guide](#)

[MCL380.1179 Use of inhaler or epinephrine auto-injector permitted; conditions; liability; extra inhaler or epinephrine auto-injector; FDA approved over-the-counter topical substance; notice to classroom teachers; definitions.](#)

Department of Consumer and Industry Services, Occupational Health Standards, [Blood borne Infectious Disease Rule 325.70001](#)

Public Health Code: Act 368 of 1978 as amended, Medical Waste Regulatory Act, [Part 138](#)

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