



WORKER SAFETY AWARENESS PROGRAM

MODULE 6 ADDITIONAL STATE INFORMATION: HAZARDOUS DRUGS

Module Six, Additional State Information: *Hazardous Drugs* provides basic information about Washington State requirements related to safely handling hazardous drugs. It recognizes that unlike Federal OSHA, Washington State has specific rules related to hazardous drug safety in the workplace. Brief descriptions of state hazardous drugs requirements are provided along with links to the accompanying Washington Administrative Code (WAC) rules. Additional tips are provided for cleaning and housekeeping related to hazardous drugs including the need for a dedicated work surface such as a countertop or tray that is only used for drug handling & preparation. For more information on hazardous drugs safety and prevention, please see the related AFHC OSHA Module 6 on Hazardous Drugs.

Grant Project Goal:

The Adult Family Home Council (AFHC) believes that introducing a first-of-its-kind, industry specific, safety awareness training program will significantly reduce worker injuries in adult family homes.

Background:

The AFHC received a grant from the Safety and Health Investments Projects (SHIP) Program, Washington State Department of Labor & Industries for \$175,000 to develop training and education materials for a worker safety awareness program specific to the adult family home (AFH) industry. Claims data from the Washington State workers' compensation system shows that workers are getting hurt in the AFH industry. There were over 12,000 reported injury claims, including over 100 serious injuries, from 2012 through 2016 in the risk class that includes adult family home businesses. In order to help prevent future injuries, an AFH Worker Safety Awareness Review Committee has been established to oversee development, upkeep, and implementation of worker safety awareness training and education materials specific to the AFH industry.

Training Topics Included in this Module:

- 1. Washington State has specific hazardous drug rules
- 2. Developing and implementing a written hazardous drug control plan if exposure is possible
- 3. Hazard assessment for hazardous drugs
- 4. Engineering controls for protecting workers from hazardous drugs
- 5. Personal protective equipment
- 6. Requirements for controlling employee exposure
 - a. Gloves
 - b. Protective clothing
 - c. Face & respiratory protection
 - d. Disposal & cleaning
- 7. Safe handling practices
 - a. Labeling
 - b. Use of dedicated work areas
 - c. Waste handling, personal hygiene, & handwashing
 - d. Cleaning, housekeeping, & spill control
- 8. Training requirements





Training Module Objectives:

- Understand Washington State's hazardous drugs rules & requirements
- Understand the requirements for developing a written hazardous drug control program
- Learn the basics for safely handling hazardous drugs
- Understand the personal protective equipment needed to keep workers safe from hazardous drugs
- Learn about safe cleaning and housekeeping practices for hazardous drugs

Target Audience:

The target audience includes the owners and operators of the 2,900 adult family homes in Washington and their approximately 14,000 employees. By definition, adult family homes are small businesses located in residential homes, each with unique challenges. The AFHC is committed to supporting and helping adult family homes succeed.

Funding and support for this project has been provided by the State of Washington, Department of Labor & Industries, Safety & Health Investment Projects.

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MODULE 6 ADDITIONAL STATE INFORMATION CHECKLIST: HAZARDOUS DRUGS

- ☐ Washington State has specific hazardous drug rules
 - Unlike Federal OSHA, Washington State does have specific workplace rules on hazardous drugs
 - o State requirements are found in Washington Administrative Code (WAC) 296-62-500
 - Adult family homes must develop and implement a written hazardous drug control plan if exposure can be reasonably anticipated
 - A model hazardous drug written control plan is included in the supplemental materials for this training module
- ☐ What are hazardous drugs?
 - Antineoplastic cytotoxic medications (chemotherapy & cancer drugs), anesthetics, antiviral agents, and others have been identified as hazardous drugs
 - Drugs are classified as hazardous when they have been identified as such by the National Institute for Occupational Safety and Health (NIOSH) or if they possess any of these characteristics:
 - Causes cancer
 - Causes organ damage at low doses in humans or animals
 - Impacts or damages DNA / genes
 - Contributes to infertility
 - Impacts a developing embryo or fetus
 - Causes developmental abnormalities
 - Has a similar structure or function to other drugs that are determined to be hazardous
- ☐ Adult family homes that do not handle, administer, or dispense hazardous drugs may not require a hazardous drug control plan, but it is always a good idea to have one
 - Capsules or coated tablets that are administered to residents without modification to their form may not pose a significant risk of occupational exposure and may not require preventive methods during normal handling
 - o Capsules or coated tablets may pose a risk requiring the need for controls if altered:
 - If tablets are crushed or dissolved
 - If capsules are pierced or opened
 - If the tablet or capsule is accidentally crushed or damaged in a way that requires spill control and clean up
- ☐ Your hazardous drugs control program must include:
 - A written inventory of your hazardous drugs
 - o A current hazard assessment for drugs where there is reasonably anticipated exposure
 - o Hazardous drugs policies & procedures including, but not limited to:
 - Engineering controls
 - Equipment use & maintenance
 - Personal protective equipment (PPE)
 - Safe handling practices





- Receiving, storage, labeling, preparing, administering, & disposing of drugs
- Cleaning, housekeeping, waste handling, & spill control
- Personnel issues (such as exposure of pregnant workers) & training
- A standard or universal precautions approach to managing exposure to hazardous drugs or precautions based on exposure risk, such as a tiered approach that effectively matches precautions to the nature of different exposures from handling, storing, cleaning, preparing, & using engineering controls
- Review & update the written hazardous drugs control program annually & whenever changes that affect exposure occur, such as:
 - Introduction of a new hazardous drug
 - A change in handling practices
- Seek & consider input from employees

☐ Hazard assessment

- Conduct a hazard assessment to determine the appropriate precautions to take for reasonably anticipated exposures
- o Assessments must include consideration of:
 - Personal protective equipment
 - Engineering controls (needleless systems, enclosed pill crushers, etc.)
 - The physical layout of your work areas
 - Types of hazardous drugs being handled
 - Volume, frequency, packaging, & form of hazardous drugs handled (tablets, coated versus uncoated, powder versus liquid, etc.)
- Assessments must include consideration of:
 - Equipment maintenance
 - Decontamination, cleaning, waste handling, & spill response
 - Potential exposures during work operations, such as drug preparation & administration
- Conduct the assessment as part of your annual hazardous drugs control program update & whenever changes occur that affect occupational exposure such as:
 - Introduction of a new hazardous drug or
 - A change in handling practices

☐ Engineering controls

- Evaluate & implement appropriate engineering controls to eliminate or minimize employee exposure
- o Examples of engineering controls include, but are not limited to:
 - Safer sharps devices
 - Enclosed pill crushers or cutters
 - Closed system devices that mechanically prohibit the transfer of contaminants or escape of hazardous drug vapors
 - Safety interlocks
 - Closed system transfer devices
 - Post-exposure requirements
- Provide information to the healthcare professional evaluating the employee





- ☐ Personal protective equipment (PPE)
 - Conduct a PPE assessment to determine appropriate PPE if there may be a reasonably anticipated exposure to hazardous drugs
 - o Provide & ensure the use of appropriate PPE if there could be exposure to hazardous drugs
 - o Use appropriate PPE whenever handling body fluids or contaminated laundry
 - o Gloves:
 - Use powder-free chemotherapy gloves when handling chemotherapy drugs or possibly contaminated items or surfaces (like laundry)
 - Provide latex-free gloves to employees with latex sensitivities
 - Wear two pairs of gloves when there is significant risk of breakage, contamination, or permeation such as when compounding, long handling periods, or cleaning up large hazardous drug spills
 - Change gloves per the glove manufacturer's instructions, type of occupational exposure, or when torn, punctured, or contaminated
 - Protective clothing:
 - Wear gowns if there is a reasonable possibility of a splash or spill
 - Wear gowns made of polyethylene-coated polypropylene or other nonabsorbent, nonlinting protective material
 - Make sure the gown has a closed front, long sleeves, & elastic or knit cuffs
 - Remove & dispose of gowns at the end of hazardous drug handling activities, when leaving a drug handling area or as soon as possible if damaged or contaminated
 - If no permeation information is available, change gowns every two to three hours or when contaminated after a splash or spill
 - o Face protection:
 - Wear a full-face shield or a mask & eye protection as appropriate when splashes to the eyes, nose, or mouth may occur such as when cleaning a spill or splitting pills
 - Respiratory protection:
 - Use appropriate respiratory protection during spill cleanup & whenever there is a significant risk of inhalation exposure to hazardous drug particulates
 - o Disposable PPE must be discarded into appropriate containers immediately after use or as soon as feasible after contamination
 - o Reusable PPE must be properly cleaned and decontaminated after use or contamination
- ☐ Safe handling practices
 - Receiving & storage:
 - Label hazardous drug containers per WAC <u>296-901-140</u> Hazard Communication Requirements
 - Store & transport hazardous drugs in a manner that minimizes the risk of breakage
 - Preparation & administration:
 - Provide designated work areas for the preparation of hazardous drugs & limit access during preparation
 - Coordinate tasks associated with preparing & administering hazardous drugs for the most effective control of worker exposure





- Do not remove tubing from an IV bag containing a hazardous drug. Spike & prime IV tubing & prepare syringes in ways that limit exposure
- Waste handling:
 - Dispose of pharmaceutical waste in accordance with applicable state & federal regulations
 - Place disposable items in designated containers
- o Personal hygiene:
 - Prohibit eating or drinking in areas where hazardous drugs are handled
- o Handwashing.
 - Wash your hands with soap and water before putting on gloves if they could be contaminated
 - Wash your hands with soap and water immediately after removing gloves and whenever they become contaminated
- o Use a dedicated work surface for drug handling
 - A separate drug handling room should not be necessary with the types of drugs that are prescribed for home use
 - Ideally, a dedicated counter space would be set aside for handling drugs
 - The use of a tray, which can be cleaned and put away after handling the drugs, is a reasonable alternative to a dedicated counter space, although not quite ideal
 - For specific questions about hazardous drug dedicated space requirements, contact John Stebbins at 206-515-2870 or email him at John.Stebbins@Lni.wa.gov

☐ Cleaning & housekeeping

- o Establish procedures for cleaning and decontaminating work areas & equipment where hazardous drugs are present
- o Do not clean contaminated equipment in unventilated areas
- o Clean work surfaces before and after each continuous activity and at the end of the work shift

☐ Spill control

 Develop written spill response procedures that comply with Chapter <u>296-824 WAC</u> Emergency response and <u>WAC 296-800-150</u>, First-aid for Emergency Washing Requirements

☐ Tips for cleaning hazardous drugs:

- All areas where hazardous drugs are handled & all reusable equipment devices must be deactivated, decontaminated, and cleaned. In addition, sterile compounding areas & devices must be disinfected
- Use wipes wetted with appropriate cleaning solution for deactivation, decontamination, & cleaning
 - Do not directly apply cleaner by using a spray bottle to avoid spreading hazardous drug residue
 - Check the manufacturer's recommendations for the proper cleaning agent to use
 - Use EPA approved deactivation & decontamination products
 - Cleaning wipes are available that are designed for hazardous drug clean-up that deactivate, decontaminate, & clean





□ Training

- o Provide effective hazardous drugs training to all employees with hazardous drug exposure at the time of their initial job assignment and whenever a new hazardous drug or new process related to handling hazardous drugs is introduced
- o Include the hazardous chemical training elements listed in WAC 296-901-14016:
 - Methods & observations for detecting the presence or release of hazardous chemicals
 - The physical & health hazards of chemicals in the work area
 - The measures employees can take to protect themselves from these hazards

The details of your hazard communication program including your labeling system & how to find & use safety data sheets
An L&I consultant can help you find solutions to prevent hazardous drug injuries and illnesses at your adult family home
Request a consultation - To request a free and confidential safety consultation, contact Washington State's Department of Labor & Industries' Consultation Program by: O Calling 360-902-5554

- o Going to: https://www.lni.wa.gov/safety-health/preventing-injuries-illnesses/requestconsultation/

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- Chapter 49.17 Revised Code of Washington (RCW) Washington Industrial Safety and Health Act (WISHA) state safety laws: https://app.leg.wa.gov/RCW/default.aspx?cite=49.17
- RCW 49.17.060 General Safety Standard that all employers must comply with: https://app.leg.wa.gov/RCW/default.aspx?cite=49.17.060
- Chapter 296-800 Washington Administrative Code (WAC) safety regulations that further define state safety requirements: https://app.leg.wa.gov/wac/default.aspx?cite=296-800
- Chapter 296-62 WAC General Occupational Health Standards: https://app.leg.wa.gov/wac/default.aspx?cite=296-62
- WAC 296-62-500 Hazardous Drugs: https://www.lni.wa.gov/safety-health/safety-rules/chapter-pdfs/WAC296-62.pdf#WAC 296 62 500
- Washington State Department of Labor & Industries (L&I) Request Consultation Page for information on how to get free safety & health assistance: https://www.lni.wa.gov/safety-health/preventing-injuries-illnesses/request-consultation/
- L&I General Website: Ini.wa.gov
- Find a local L&I office near you: http://www.lni.wa.gov/Offices
- L&I Hazardous Drugs Advisory Committee webpage: https://lni.wa.gov/safety-health/grants-committees-partnerships/advisory-committees/sh-committees-hazardous-drugs-advisory-committee#more-information-and-resources
- L&I Healthcare Clinic Hazardous Drug Program Guide (Sample hazardous drug control plan): https://wisha-training.lni.wa.gov/Safety/Topics/AtoZ/HazardousDrugs/ProgramGuides.asp
- L&I Hazardous Drug Handling Advisory Committee Nursing and USP <800>: What's different from NIOSH and WA Law? By Seth Eisenberg RN OCN® BTMCN® (Short PowerPoint slide presentation that compares federal standards to Washington's hazardous drug rule): https://lni.wa.gov/safety-health/grants-committees/hazdrugsdocs/HazDrugsLINursingImplicationsOfUSP.pptx
- L&I Nursing and Residential Care webpage: https://lni.wa.gov/safety-health/safety-
- topics/industry/nursing-residential-care
- L&I sample letter requesting a safety data sheet: https://lni.wa.gov/dA/856453fb3f/HT10-CR.doc
- L&I Safety & Health Investment Projects (SHIP) grant project by the Washington State Pharmacy
 Association on Best Practice Safety Tools for Pharmacists Handling Hazardous Drugs:
 https://lni.wa.gov/safety-health/grants-committees-partnerships/safety-health-investment-projects-grant-program/ship-grants-2013xa00227
- Federal OSHA Controlling Occupational Exposure to Hazardous Drugs webpage: https://www.osha.gov/SLTC/hazardousdrugs/controlling_occex_hazardousdrugs.html
- National Institute of Occupational Safety and Health (NIOSH) List of Antineoplastic and Other Hazardous
 Drugs in Healthcare Settings 2012: https://www.cdc.gov/niosh/docs/2012-150/pdfs/2012-150.pdf
- Centers for Disease Control and Prevention (CDC) Preventing Occupational Exposure to Antineoplastic and Other Hazardous Drugs in Health Care Settings: https://www.cdc.gov/niosh/docs/2004-165/





- Washington Health Care Association (WHCA) Hazardous Drug Rule webpage: https://www.whca.org/washington-hazardous-drugs-rules/
- WHCA Hazardous Drug Inventory List (Includes recommended personal protective equipment for different drugs): http://www.whca.org/files/2015/03/WHCA-Hazardous-Drug-List.pdf
- WHCA Hazardous Drug Personal Protective Equipment Requirements list: http://www.whca.org/files/2015/03/WHCA-Personal-Protective-Equipment-Requirements.pdf
- American Society of Hospital Pharmacists (ASHP) Guidelines on Handling Hazardous Drugs: https://www.ashp.org/-/media/assets/policy-guidelines/docs/guidelines/handling-hazardous-drugs.ashx
- U.S. Army Public Health Center Hazardous Drugs: Surface Deactivation, Decontamination And Cleaning Standard Operating Procedure Guide: https://phc.amedd.army.mil/PHC%20Resource%20Library/TIP_No_55-085-1017 HazardousDrugsSurfaceDeactivationDecontaminationandCleaningSOPGuide.pdf
- United States Pharmacopeia (USP) General Chapter <800> Hazardous Drugs—Handling in Healthcare Settings (The generally accepted standard for use of hazardous drugs in the healthcare industry): https://www.usp.org/compounding/general-chapter-hazardous-drugs-handling-healthcare
- USP <800> HazRx® Mobile App (Official phone app for identifying hazardous drugs): https://www.usp.org/hazrx-app
- USP Healthcare Quality & Safety webpage (includes information on safe hazardous drug handling in healthcare settings): https://www.usp.org/healthcare-quality-safety
- American Society of Health-System Pharmacists Processes to Address USP Chapter <800> Surface
 Contamination (Slide presentation with specific cleaning guidelines and instructions on how to read drug
 labels to identify proper cleaning methods):
 https://ashpadvantagemedia.com/contamination/files/BD Contamination Handout Web.pdf
- Contec Healthcare About <USP 800> (Guidelines for Deactivating, Decontaminating, Cleaning and Disinfecting hazardous drugs): https://www.contechealthcare.com/usp-800-guidelines/
- Contec Healthcare USP Compliant Cleaning Procedures for Hazardous Drugs and Contec® Product Solutions Deactivating, Decontaminating, Cleaning, and Disinfecting Guidelines: https://www.contechealthcare.com/assets/usp800cleaningprocedures 7JZrRW6.pdf
- Readyfor800.com Handling a Hazardous Drug Spill video training: https://www.readyfor800.com/spills-cleaning-disposal/
- Oncology Nursing Society (ONS) Toolkit for Safe Handling of Hazardous Drugs for Nurses in Oncology: https://www.ons.org/sites/default/files/2018-06/ONS_Safe_Handling_Toolkit_0.pdf

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