Allowable Costs – Laboratory Coats and Employee Uniforms

Purpose

To allow local agencies (LAs) to be reimbursed for employee uniforms and laboratory coats/smocks provided to staff that perform hematological testing so as to reduce employee exposure to blood borne pathogens.

Authority

7 CFR Part 3016; OSHA Regs; 29 CFR Part 1910.1030, Uniform Grant Guidance, 2 CFR 200

Policy

With prior state agency (SA) approval, LAs may request reimbursement for the cost of employee uniforms and laboratory coats/smocks provided to staff that perform hematological testing of WIC applicants/participants. LAs may request reimbursement for laundering/cleaning costs for such items.

Procedures

I. Laboratory coats shall only be provided to staff who do hematological testing.

II. The purchase of uniforms (includes T-shirts when used as a uniform) is discouraged, but shall be considered on a case-by-case basis if the parent agency has a dress code policy that requires employees to wear uniforms.

III. These garments and the costs for laundering/cleaning shall be provided at no cost to employees.

IV. Prior approval by State Agency is required.
V. Only employees who may be called upon to perform hematological testing may be provided with laboratory coats/smocks. Laboratory coats shall be wrist length in style.

VI. Regardless of the total cost involved, a written request shall be submitted to the SA containing the following:

A. the number of employees and number of uniforms or laboratory coats/smocks requested:
B. documentation of, at a minimum, three bids;
C. total dollar amount of low bid and the cost per uniform or laboratory coat/smock;
D. copy of agency wide dress code policy requiring uniforms (not required for laboratory coats/smocks); and
E. statement that low bid is acceptable.

VII. The SA shall approve or disapprove the uniform request in writing.

VIII. The laboratory coats/smocks and employee uniforms are the property of the WIC Program. The laboratory coats/smocks shall not be taken home by the employees in order to prevent the accidental spread of contamination.

IX. Costs associated with laboratory coats/smocks and employee uniforms shall be listed as separate items in the LA’s Plan to Allocate Direct Costs (PADC) and billed only as administration costs and in accordance with Policy AC:28.0.

X. Charges for laboratory coats/smocks and employee uniforms, and cleaning of these garments shall be supported by documentation vendor invoices/receipts, and proof of payment.
Guidelines

I. The underlying intent of OHSA regulations on occupational exposure to blood borne pathogens is the concept of "universal precautions" that requires that all blood be treated as if known to be infectious for HIV, hepatitis B virus (HBV), and other blood borne pathogens. OSHA regulations require personal protective equipment be provided to employees at no cost according to the type of testing being done. According to OHSA, for the typical WIC clinic in which a finger stick is performed, appropriate protective clothing would include gloves and possibly a laboratory coat.