

|  |                          |                             |                    |
|--|--------------------------|-----------------------------|--------------------|
| <i>Policy: Administrative</i><br><b>Experiential Education<br/>Participation</b> | <i>Issued:</i><br>5/6/97 | <i>Revised:</i><br>11/27/18 | <i>Page 1 of 5</i> |
|--|--------------------------|-----------------------------|--------------------|

## Introduction

To protect the health of Creighton University School of Pharmacy and Health Professions (SPAHP) students and the patients they serve, and in accordance with contractual arrangements with varied health-related institutions, students in programs which have an experiential education component must meet specified requirements including immunizations, health insurance coverage, and acceptable criminal background checks before being enrolled in any of the School's practice-based academic programs.

Students in programs which have an experiential education component must remain compliant with the immunization, health insurance coverage, and acceptable criminal background check requirements, as well as achieving and maintaining cardiopulmonary resuscitation (CPR) basic life support (BLS) certification and completing training in universal precautions and HIPAA requirements before they can participate in experiential education activities. Proof of compliance with all of the items listed above will be required by Experiential Education Directors, and may be required by clinical instructors/preceptors, before students can be placed or accepted at educational practice sites. Students who have failed to remain compliant with these requirements will not be allowed to participate in experiential education activities and may be subject to dismissal from the School. At a minimum, non-compliance with this policy may impact or delay the student's date of graduation.

## Immunization

Specific information on immunization requirements for Creighton University Health Science students is available online at <https://www.creighton.edu/chc/studenthealthservices/immunizationrequirements/>. The cost for all immunizations, titers and screenings will be borne by the student.

All admitted, entry-level SPAHP students will be prompted in e-Orientation to submit a confidential health record to Student Health Services in Birdhouse. Students will not be allowed to enroll if documentation of vaccination against measles, mumps, rubella, varicella (chickenpox) tetanus-diphtheria pertussis, and tuberculosis screening is not received by August 1<sup>st</sup> prior to their anticipated matriculation date. Tuberculosis documentation must include a two-step PPD skin test at the beginning of the annual testing cycle followed by a yearly PPD skin test (An explanation of the two-step PPD test is available online at [http://www.creighton.edu/fileadmin/user/StudentServices/StudentHealthServices/docs/SHS\\_twostepPPD.pdf](http://www.creighton.edu/fileadmin/user/StudentServices/StudentHealthServices/docs/SHS_twostepPPD.pdf)). Any student with a positive PPD skin test (defined as a

|  |                          |                             |                    |
|--|--------------------------|-----------------------------|--------------------|
| <i>Policy: Administrative</i><br><b>Experiential Education<br/>Participation</b> | <i>Issued:</i><br>5/6/97 | <i>Revised:</i><br>11/27/18 | <i>Page 2 of 5</i> |
|--|--------------------------|-----------------------------|--------------------|

reaction greater than 10mm) must submit documentation in the form of a written physician's report and chest x-ray done in the U.S. within the past 12 months or annual provider review/QuantiFERON Gold blood testing. A history of BCG vaccine does not preclude a student from PPD skin testing. By the end of the second semester of enrollment in the SPAHP, students are required to complete a series of hepatitis B vaccinations followed by a titer proving immunity. Students are also required to complete a tuberculosis screening annually. Students are also required to receive the influenza vaccine by December 1 each year and documentation must be submitted via Student Health Services Birdhouse Portal. Failure to do so will prevent students from participating in experiential education.

Post-professional OTD students who have an experiential education component are required to comply with the Creighton University Health Sciences' immunization requirements prior to engaging in experiential education activities. and the Post-professional Program Director will inform post-professional students in advance of when required immunization documentation must be submitted and will monitor student compliance.

Students may request a waiver of immunization or screening only if they can document that they have been previously immunized or screened, or where there is a documented medical contraindication.

Students considering international experiential training should be aware that additional immunizations may be required in order to comply with health requirements outside of the United States.

### **Health Insurance Coverage**

All students must be covered by a comprehensive health insurance plan for the entire year. The University sponsors a comprehensive health insurance plan at a group rate which provides year-round coverage. Upon matriculation, the premium for the University-sponsored Student Health Insurance Plan will automatically be added to the student's tuition and fees statement each year. In order to have this charge removed from an account, students must annually submit a properly completed waiver form and a copy of both sides of a current health insurance card to Student

|  |                          |                             |                    |
|--|--------------------------|-----------------------------|--------------------|
| <i>Policy: Administrative</i><br><b>Experiential Education<br/>Participation</b> | <i>Issued:</i><br>5/6/97 | <i>Revised:</i><br>11/27/18 | <i>Page 3 of 5</i> |
|--|--------------------------|-----------------------------|--------------------|

Health Services before the established deadline.

### **Criminal Background Checks**

All entry-level and post-professional SPAHP students will be required to submit to and receive an acceptable criminal background check as a condition of enrollment. Acceptable student backgrounds for enrollment will be determined by each program's Admissions Committee in consultation with the Experiential Education Director. Background investigations will be conducted via a contractual arrangement with an outside vendor at a frequency to be determined by the Experiential Education Director of the student's program of study. Some clinical facilities may require additional background investigation(s) prior to permitting students to participate in experiential education activities, and this will be at the student's expense. Program enrollment and clinical facility placement are contingent upon completion and receipt of an acceptable criminal background investigation. Acceptable student backgrounds for experiential education participation will be determined by the Experiential Education Director in consultation with selected faculty. The investigational screenings will include, but may not be limited to, the following for every state and county of residence: criminal record, alias name, warrants, protection orders, residential history, social security number, abuse registry, sex offender registry, Office of the Inspector General (OIG) cumulative sanction report. All students must also successfully complete annual Children and Vulnerable Adult training online to participate in experiential education.

Criminal background checks are only required for students who are foreign nationals if they have been present in the United States for more than one year. Issuance of the F-1 student visa will be considered equivalent to the background check for the first year of the student's presence in the United States. After the first year the student must obtain a Social Security Number (SSN) and a background check must be conducted before the student may proceed in their academic program. If a clinical site requires a background check during the first year, the student must obtain an SSN and get a background check earlier than upon completion of the first year in the United States. The Global Engagement Office routinely assists students in obtaining their SSN during International Student Orientation and can be contacted at other times for guidance

### **Cardiopulmonary Resuscitation (CPR) Basic Life Support (BLS) Certification**

All entry-level students in the SPAHP are required to obtain and maintain biennial certification in CPR-BLS for the healthcare provider from the organization required by their individual program of study. All entry-level students must attend the

|  |                          |                             |                    |
|--|--------------------------|-----------------------------|--------------------|
| <i>Policy: Administrative</i><br><b>Experiential Education<br/>Participation</b> | <i>Issued:</i><br>5/6/97 | <i>Revised:</i><br>11/27/18 | <i>Page 4 of 5</i> |
|--|--------------------------|-----------------------------|--------------------|

mandatory CPR-BLS classes scheduled during the first month of the first semester of their program of study or in the summer immediately preceding their first semester and repeat the certification if their program of study extends beyond two calendar years. The SPAHP will inform students of CPR-BLS for the healthcare provider courses offered on campus or in a facility located in close proximity to the Creighton University campus, as well as their respective costs. The students will be responsible for the cost of the certification program.

Post-professional students must fulfill the CPR-BLS requirement by taking an American Heart Association authorized Basic Life Support for Healthcare Providers training course or its equivalent prior to experiential education activities. Proof of CPR-BLS certification will be submitted to the Program Director one month prior to student participation in the experiential education program, and biennially thereafter for as long as the student remains enrolled.

### **Standard Precautions**

The Occupational Safety and Health Administration (OSHA) standard for Occupational Exposure to Blood borne Pathogens (29 CFR 1910.1030) is designed to eliminate or minimize occupational exposure to Hepatitis B Virus (HBV), Human Immunodeficiency Virus (HIV) and other blood borne pathogens. Healthcare professionals face a significant health risk as the result of occupational exposure to blood and other potentially infectious materials because they may contain blood borne pathogens, including hepatitis B virus, which causes serious liver disease, and human immunodeficiency virus, which causes Acquired Immunodeficiency Syndrome (AIDS). OSHA has concluded that this exposure can be minimized or eliminated by using a combination of engineering and work practice controls, personal protective clothing and equipment, training, medical surveillance, Hepatitis B vaccination, signs and labels and other provisions. Therefore, all students in the SPAHP are required to attend training sessions on Standard Precautions to decrease exposure to blood borne pathogens prior to engaging in experiential education activities.

The post-professional Program Director will inform post-professional students in advance of when required standard precautions training documentation must be submitted and will monitor student compliance.

|  |                          |                             |                    |
|--|--------------------------|-----------------------------|--------------------|
| <i>Policy: Administrative</i><br><b>Experiential Education<br/>Participation</b> | <i>Issued:</i><br>5/6/97 | <i>Revised:</i><br>11/27/18 | <i>Page 5 of 5</i> |
|--|--------------------------|-----------------------------|--------------------|

### **Health Insurance Portability and Accountability Act (HIPAA)**

To protect patient health information, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, Public Law 104-191, required the Department of Health and Human Services (HHS) to establish national standards for electronic health care transactions and national identifiers for providers, health plans, and employers, as well as the adoption of federal privacy protections for individually identifiable health information. In response to the HIPAA mandate, the HHS developed the Privacy Rule, which established national standards to protect and guard against the misuse of individually identifiable health information for certain health care entities (i.e., health plans, health care clearinghouses, and health care providers who conduct certain health care transactions electronically). Since students are routinely exposed to patients' protected health information and must comply with health care facilities' policies and procedures, all students in the SPAHP are required to attend HIPAA and Privacy Rule training sessions prior to engaging in experiential education activities.

The Post-professional Program Director will inform post-professional students in advance of when required HIPAA and Privacy Rule training documentation must be submitted and will monitor student compliance.

### **Drug Testing**

Some health care facilities require students to submit to and pass a drug test prior to participation in experiential activities at the facility. This testing is at the student's expense. Students who do not complete or do not pass a drug test as required by these facilities will not be allowed to participate in experiential education activities at the facility, and may face sanctions, including possible dismissal from the program.

### **Conclusion**

Non-compliance with any portion of this policy may impact or delay the student's date of graduation or the ability to continue in their program of study. Students who fail to remain compliant with any of these requirements will not be allowed to participate in experiential education activities and may be subject to dismissal from the School.

*Approved by Executive Committee 3/6/2019*

*Approved by School Administration on 3/1/2019*

*Approved by the Bylaws, Policies, and Procedures Review Committee on 2/4/19*