

Policy Name: Clinical Compliance Requirements
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Title of Policy Owner: Campus Director & Dean of Academic Affairs - BSMCON
Policy Type: RHEI/Shared Services BSMCON SCHS SOMI
Approved by: RHEI Leadership Team
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I. Policy

This policy outlines the clinical compliance requirements for all Bon Secours Memorial College of Nursing (BSMCON) students for admission to and continuance in the program; and policies and procedures that students must comply with that govern nursing practice in the practicum agencies or institutions that students visit for clinical practicum.

II. Purpose

The purpose of this policy is to ensure that students meet the clinical compliance requirements of the clinical agencies for practicum courses the nursing program contracts with. In addition, students must adhere to clinical agencies' policies and procedures that govern nursing practice to protect patient safety.

III. Scope

This policy applies to all BSMCON students.

IV. Definitions

Clinical Compliance Software – refers to the system used to track/document student compliance of all clinical requirements.

V. Policy Details

This policy outlines the clinical compliance requirements required upon acceptance and entry to the nursing program. Some requirements have annual/biennial updates. Students must submit all documentation requirements in a timely manner as specified by the College. Students are financially responsible for any associated costs of all clinical compliance requirements. Failure to comply with any of these requirements render a student ineligible to participate in clinical experiences required in the curriculum (refer to ACA 3.05: Nursing Program Attendance detailing consequences of inability to attend assigned clinical practica). The information provided to the College may be shared with the clinical agencies in which the student has an assigned clinical experience. Clinical compliance requirements are described according to the four following categories:

1. Pre-Licensure Student Entrance Requirements
2. Pre-Licensure Continuing Student Requirements

- 3. Post-Licensure Student Requirements
- 4. General Requirements

1. Pre-Licensure Student Entrance Requirements

Clinical Compliance Software: Upon Acceptance

Upon acceptance, all Pre-Licensure students are required to open a Clinical Compliance Software account. All entrance requirements must be completed, and documentation submitted to the Clinical Compliance Software prior to enrollment. The following requirements are conditions of admission. Failure to complete the list below would result in an offer of admission being withdrawn. Health requirements (set forth by the Centers for Disease Control (CDC), Code of Virginia and OSHA) are specified below:

- Physical Health Assessment: Upon Entry
A health assessment/history by medical personnel must be completed, indicating ability to perform the essential functions of a student nurse. Students must provide additional documentation as necessary.
- Tetanus/Diphtheria/Pertussis (Tdap) Vaccine: Upon Entry
History of at least one dose of Tdap vaccine, with a dose of Tdap or Td vaccine within last 10 years.
- Measles, Mumps, Rubella (MMR) Vaccine: Upon Entry
2 doses of vaccine or titer indicating immunity
- Varicella Vaccine: Upon Entry
2 doses of vaccine or titer indicating immunity
- Hepatitis B Vaccine: Upon Entry
Completed vaccine series (2- or 3- dose series) or titer indicating immunity
- Tuberculosis (TB) Screening: Upon Entry
In accordance with the CDC guidelines and the VDH guidelines, newly admitted students must be tested for TB.

Use of an IGRA (Interferon Gamma Release Assay) blood test for this purpose is required (*PPD skin tests are not acceptable*) The two FDA-approved IGRAs available for use in the United States are QuantiFERON Gold IN-Tube and T-SPOT-TB.

Newly admitted students with a positive result or history of a positive result must have a Chest X-ray with a negative result within one year of admission in order to be compliant. Students must provide the Chest X-ray date and result on the ***Immunization Record*** upon admission.

- Drug Screen: Upon Entry
All students are required to submit to a urine drug test prior to enrollment. Drug screens must be completed at a LabCorp specimen collection site. Drug screens

completed at physician's offices will not be accepted. Students will obtain their order for their drug screen upon opening their required Clinical Compliance Software account. Students with positive drug screens will be denied acceptance into the College.

- **Criminal Background Check: Upon Entry**
Students are required to complete a criminal background check prior to enrollment. The criminal background check will be completed automatically upon opening of the student's compliance system account.

Nurses work with vulnerable populations; therefore, it is in the public interest to review criminal conduct and past behavior prior to enrolling students into the nursing program. Convictions of a felony or a misdemeanor involving "moral turpitude" (lying, cheating, stealing or pattern of impairment) may preclude enrollment in the program. Even if a conviction history does not bar a student from attending the College, licensing boards will make their own determination. Licensing boards may deny an individual the opportunity to sit for an examination if an applicant has a criminal history or is convicted, pleads guilty or no contest to a felony or other serious crime. Successful completion of the Pre-Licensure BSN program does not guarantee licensure, the opportunity to sit for a licensure examination, certification or employment. Students are responsible for background check costs during enrollment.

The Campus Director, Program Director or their designee will notify the student either verbally or in writing if anything in the student's record indicates a conviction barring the student from clinical rotations. If the student is deemed ineligible for clinical rotations at any time during the program due to criminal history record, the student will be required to withdraw from the program and/or related courses as stipulated by the individual health science program.

While enrolled in the College, the student must immediately notify the Program Director or designee of any charges or convictions related to a misdemeanor or felony.

- **Virginia Child Protective Services Investigation: Upon Entry**
Students are required to complete a Virginia Child Protective Services Background Investigation form to be submitted to the VA Department of Social Services through the Clinical Compliance Software. This form will be filled out by students at New Student Orientation and sent on their behalf.
- **Minors: Upon Entry**
Students who are minors (under 18 years of age) must provide the College of Nursing with written parental or guardian consent for emergency medical and surgical care, upon entry into the program should it be needed at a later time.
- **Basic Life Support Certification: Upon Entry**
Students must provide current certification in Basic Life Support (BLS) for healthcare providers course upon entry to the College. Bon Secours Mercy Health recognizes

three certifying bodies: The American Heart Association (AHA), The American Red Cross, and the American Health and Safety Institute (AHSI). Online courses without demonstration components are not acceptable. It is the student's responsibility to arrange BLS recertification as needed.

- **Compliance Learning Modules: Upon Entry**
Students are responsible for completing assigned modules by the deadline. Entering students will be provided with instruction on how to access the modules during orientation.

2. Pre-Licensure Continuing Student Requirements

Students are expected to provide required documentation by the established deadlines throughout the program. Practicum sites require the College of Nursing to verify student compliance status (including immunization history). ***Students with any incomplete clinical compliance requirements will not be allowed to attend practicum experiences with direct patient care. Practicum hours missed due to incomplete requirements will be calculated in overall absences as described in the Nursing Program Attendance policy (ACA 3.05).***

Several requirements must be updated on a regular basis as specified below:

- **Flu Vaccine: Annual**
All students must receive a flu vaccine annually unless the student has a valid College-approved medical exemption or exemption for sincerely held religious belief.
- **Compliance Learning Modules: Annual**
Continuing students are required to complete compliance learning modules annually and as required. Students are responsible for checking their accounts on a regular basis for newly assigned modules.
- **Basic Life Support Certification: Biennial**
Students must provide current certification in Basic Life Support (BLS) for healthcare providers course upon entry to the College and then bi-annually thereafter. Bon Secours Mercy Health recognizes three certifying bodies: The American Heart Association (AHA), The American Red Cross, and the American Health and Safety Institute (AHSI). Online courses without demonstration components are not acceptable. It is the student's responsibility to arrange BLS re-certification as needed.
- **Point of Care Testing (POCT):** Beginning in the first practicum course in the curriculum and annually thereafter, students need to be recertified in POCT. Students who have successfully participated in the documented initial training and competency program will be permitted to perform POCT in the clinical environment. Failure to complete the annual competency classes will result in loss of POCT privileges in the clinical environment and may result in an inability to participate in clinical experiences. Students who are employed by Bon Secours may recertify POCT at work.

3. Post-Licensure Student Requirements

RN-BSN students are responsible for providing documentation to comply with clinical site regulations as needed. Students may be required to complete a renewal background check if it is required by a clinical agency.

4. General Requirements

Nursing students are expected to comply with all policies and procedures governing nursing practice in the practicum agency or institution, including policies and procedures regarding hazardous materials, standard precautions, and health requirements.

- **Reasonable Suspicion Drug Screening**. Due to the nature of nursing profession with responsibility for the care of human beings, it is expected that students will be in a condition fit for the competent and safe performance of their duties at all times; in particular during practicum work.. Associates and students should report to administration their reasonable suspicion that a student is impaired by alcohol or drugs during practicum work. If, upon investigation and review of the report, the Program Director (or a designee) concurs that there is reasonable suspicion of impairment by alcohol or drugs, the student will be required to immediately submit to drug and alcohol testing.

A student is impaired if they display behavior or conduct which suggests that their ability to function mentally or physically in a safe and/or appropriate fashion is compromised or affected by drugs or alcohol. Observable signs that could create a reasonable suspicion of impairment include: physical signs such as swaying, holding onto things, dilated pupils, stumbling, slurring of speech or unusual appearance such as stained clothing, unusual odors, overall messy appearance. The student will be required to pay for testing. Refusal to undergo testing is treated as a positive test.

Except as limited by applicable law, positive results on the test will result in discipline, up to and including the student's dismissal from the College. Students also may be subjected to testing in accordance with the policies of a practicum site, and a positive test resulting from the application of any such policy will result in discipline, up to and including the student's dismissal from the College.

- **HIPAA – Health Insurance Portability and Accountability Act**
“The Department of Health and Human Services and all other health care agencies must ensure their customers (i.e. clients, insured individuals, providers and health plans) that the integrity, confidentiality, and availability of electronic protected health information that they collect, maintain, use or transmit is protected.” HIPAA is a topic in one of the required compliance learning modules assigned to students that must be completed prior to entering the clinical setting.
- **Criminal Background Check:**

If a single clinical site requires a background check (in addition to the one completed prior to admission), the students who participate in a clinical rotation at that site will be required to complete a criminal background check.

- Health Insurance:
The College recommends, but does not require, that students carry private health insurance throughout enrollment in the program to cover needed health services that are beyond first aid. Students who do not choose to carry health insurance are solely responsible for all costs incurred related to their health while a student at BSMCON.

VI. Attachments

None

VII. Related Policies

ACA 3.05 Nursing Program Attendance

VIII. Disclaimers

NOTE: There may be additional health requirements/immunizations mandated by the College and/or clinical agencies. There may be additional pre-entrance health requirements mandated by individual programs. See individual program handbook.

Nothing in this policy creates a contractual relationship between Bon Secours Memorial College of Nursing (BSMCON) and any party. BSMCON, in its sole discretions, reserves the right to amend, terminate or discontinue this policy at any time, with or without advance notice.

IX. Version Control

Version	Date	Description	Prepared by
1.0	11/10/2020	Revisions and new template	Dean of Academic Affairs
2.0	02/24/2021	Approved	Administrative Cabinet
3.0	10/25/2021	COVID process change	Dean of Academic Affairs
4.0	01/11/2022	Policy Revisions	Campus Director and Dean of Academic Affairs
5.0	04/07/2023	Policy Revisions	Academics
5.1	5/8/2024	Policy Revisions	Campus Director and Dean of Academic Affairs