Bon Secours Health System, Inc.
Richmond Region
Bon Secours Memorial College of Nursing

Title: Clinical Compliance Requirements | Policy | Date: 8/1/2014
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Areas Affected: All BSMCON Faculty & Students | Page 1 of 5

CLINICAL COMPLIANCE REQUIREMENTS

Purpose:

The nursing program contracts with clinical agencies for practicum courses and many require the College to provide various student documentation before they will allow students access to the clinical setting. Students must submit all documentation requirements in a timely manner, as specified by the College. Some requirements require annual/biennial updates. The information provided to the College may be shared with the clinical agencies in which the student has an assigned practicum experience.

1.   Pre-Licensure Student Entrance Requirements

Upon acceptance, all students are required to open a CastleBranch Account. CastleBranch is the College's online clinical compliance management system. All entrance requirements must be completed and documentation submitted to CastleBranch 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 Failure to complete the list below would result in an offer of admission being withdrawn.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:

- 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): Upon Entry
  Tdap vaccine within the past 10 years

- Measles, Mumps, Rubella (MMR): Upon Entry
  2 doses of vaccine or titer indicating immunity

- Varicella: Upon Entry
  2 doses of vaccine or titer indicating immunity

Reference Policy ACA 3.05

- Hepatitis B: Upon Entry
  - If the Hepatitis B series has been completed prior to admission, a titer must be drawn to show proof of immunity.
    - If the student has proof of immunization and a positive titer, the requirement is satisfied.
    - If the student has proof of immunization and a negative titer, the student will be required to obtain a Hepatitis B booster immunization and provide documentation of the booster.
  - If the student has never completed the 3 dose series of the Hepatitis B vaccine, documentation of the progress obtaining the 3 dose series and documentation of a post-vaccination titer 1-2 months following the last immunization is required.
    - If the post vaccination series titer indicates immunity (positive), the requirement is satisfied.
    - If the post vaccination series titer does not indicate immunity (negative), the student will be required to obtain a Hepatitis B booster vaccination and provide documentation of the booster.

- 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 ***Initial Immunization Record Form*** 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 Labcorp. Students will obtain their order for their Drug Screen upon opening their required CastleBranch account. Students with positive drug screens will be denied acceptance into the College.

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

- 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 CastleBranch. This form will be filled out by students at New Student Orientation and sent to CastleBranch 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. The College offers opportunity for students to fulfill this requirement through the HeartCode program. It is the student's responsibility to make arrangements for BLS re-certification as needed.

- Learning Management System (LMS)Requirements: Upon Entry
  Required learning modules are posted to students' LMS accounts. Students are responsible for completing assigned modules by the deadline. Entering students will be provided with instruction on how to access the LMS during orientation.

1.   Pre-Licensure Continuing Student Requirements

Students are expected to provide required documentation by the established deadlines. Practicum sites require the College of Nursing to verify student compliance status (including immunization history). ***Students with incomplete TB screening, criminal background check, LMS modules, and/or current BLS certification 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 Attendance and Tardiness policy (NUR 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. Flu shots are offered to students at no charge through Bon Secours Mercy Health during September and October. Students will receive a flu shot tag for their ID badge upon completion of their flu shot and the tag must remain on the students ID badge throughout the year.

- Tuberculosis (TB) Screening: Annual
  All students must complete and submit the *TB Screening Questionnaire Form* in compliance with annual clinical documentation deadlines. This form is sent out to students annually in February by the Nursing Operations Coordinator.

- LMS: Annual
  Continuing students are required to complete LMS modules annually and as required. Students are responsible for checking their LMS 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. The College offers opportunity for students to fulfill this requirement through the HeartCode program. It is the student's responsibility to make arrangements for BLS re-certification as needed.

Point of Care Testing (POCT): Beginning in NUR 2103, 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.

2.   **Post-Licensure Students**

RN-BSN students are responsible for providing documentation to comply with clinical site regulations as needed.

3.   **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 as a practice 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, and in particular during practicum work. Faculty, staff 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 Dean of Nursing (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 through a contracted drug testing company. The Dean of Nursing may, but is not required to, seek consultation with a third party vendor for assistance with determining whether such reasonable suspicion exists and for administering the testing process. A student is impaired if he or she displays behavior or conduct which suggests that his/her 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 insure their customers (i.e. clients, insured individuals, providers and health plans) that the integrity,

confidentiality, and availability of electronic protected heath information that they collect, maintain, use or transmit is protected."

A module on HIPAA is one of the required LMS modules assigned to the students that must be completed prior to entering the clinical setting.

- <u>Criminal Background Check</u>:
  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.

- <u>Health Insurance</u>:
  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 his/her health while a student at BSMCON.