

**2022-2023**  
**Cleveland Clinic**  
**Student and Outside Learner Health Handbook**

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**Target Audience:**

Cleveland Clinic United States locations

- Internal/External Health Professions Education Students
- Medical Student Rotators (does not include all populations)
- Research Students, Visitors and Rotators
- Visiting Residents
- Ohio University Heritage College of Osteopathic Medicine Students
- Visiting Clinical Preceptors, Instructors, Coordinators and On-site Faculty

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Director of Student/Learner Health

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***Note: This handbook can be revised at any time. Printed copies are for reference only. Please refer to the electronic copy for the latest version.***

## Overview

### Position Statement

The Cleveland Clinic Health System (CCHS) is committed to providing the highest quality education and to promoting professionalism, wellness and a culture of safety across the enterprise. Personal responsibility and accountability are cornerstones of professionalism. To this end, our educational policies are intended to ensure that all students/learners entrusted with the health, safety, and welfare of patients are held to a high standard of professional behavior and conduct. Accordingly, all are expected to demonstrate good judgment, ethical behavior and awareness of health risks posed by contagions in the clinical environment. The enterprise has a responsibility to ensure that students/learners are appropriately immunized and exercise infection precautions wherever students are engaging in clinical education and are functioning free from the influence of illicit or illegal substances as they serve within teams, as learners, and providers of clinical care. Unless prescribed by a clinician, the use of controlled and illegal substances, including marijuana, and the use of tobacco products and abuse of alcohol are prohibited. Also, in consideration of contagions such as SARS-CoV-2, students/learners are charged with conducting themselves in a responsible manner while outside the clinical space to mitigate exposure to and transmission of such illnesses anywhere within the CCHS.

### Purpose

This handbook is intended to provide students, learners and program coordinators with clear expectations, guidelines as well as a health and wellness resource while participating in a Cleveland Clinic Health System clinical program or educational experience. The primary objective is to safeguard the health of patients, employees, employees' family members and students/learners by ensuring that all student/learners, clinical instructors and preceptors who enter the Cleveland Clinic Health System (CCHS) can reasonably be expected to perform the essential functions of their clinical or educational experience in a safe and effective manner.

Any questions related to student/learner health that are not addressed in this handbook may be discussed with Dr. Anthony Tizzano, Director of Student/Learner Health at (330) 464-2111 or [tizzana@ccf.org](mailto:tizzana@ccf.org).

### Policy Statement

All students/learners placed or offered positions at the Cleveland Clinic are required to complete a medical assessment. This assessment may include health screening exam, drug screening, tuberculosis testing/screening and required immunizations as well as other assessments as indicated by the student's/learner's clinical program or experience. Participation is contingent upon the student's/learner's completion of the medical assessment. Any student/learner, clinical instructor or visiting preceptor who does not comply with these requirements will not be permitted to participate in a clinical or educational experience within the CCHS.

## Exemptions/Accommodations

Accommodations and/or exemptions from any aspect of the pre-placement medical assessment based on a medical contraindication, disability or on the grounds that it conflicts with bona fide religious beliefs will be considered on a case-by-case basis. Pursuant to the Disability Accommodation in Education Policy and related procedures, a student/learner may request an accommodation from their school or Cleveland Clinic program administrator.

## Definitions

### **Cleveland Clinic United States locations:**

Includes the main campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, South Pointe, Children's Hospital for Rehabilitation, and all Family Health Centers, Physician practice sites, Nevada practice sites, Emergency Departments, Express Care Centers, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

### **Student/Learner:**

A person enrolled in a Cleveland Clinic internal or external educational program, including a clinical rotation pursuant to an affiliation agreement with a School, as well as observers.

### **Visiting Faculty/On-site Faculty/Preceptor:**

A clinical instructor, on-site faculty or preceptor who is not a Cleveland Clinic employed caregiver. The visiting faculty member is engaged in the direct oversight of the student experience and activities at a CCHS facility.

### **School:**

A school, college or university with which Cleveland Clinic has an affiliation agreement that provides for student/learners to participate in clinical rotations in the Cleveland Clinic health system.

### **Flu Season:**

As determined annually by Occupational Health, the period during which flu is most prevalent. Flu season is typically from November through March.

### **Significant Health Risks to the Clinical Environment:**

Contagions identified by Occupational Health as posing a significant health risk to the clinical environment for which screening is necessary, such as COVID-19. Annually or as needed, the Director of Student/Learner Health shall inform Schools of any such significant health risks.

## Oversight and Responsibility

- The Education Institute, in concert with Occupational Health, is responsible to review, revise, update, and operationalize this policy and maintain compliance with regulatory or other requirements.

- Student/Learner Health in collaboration with Occupational Health is responsible for determining need for pre-placement and periodic medical assessments, medical screenings, drug screenings, and required and recommended immunizations and will maintain the confidentiality of all medical records.
- Academic Program Coordinators are responsible for informing students/learners who plan to participate in clinical or educational experiences within the CCHS of the pre-placement medical assessment and immunization requirements.
- If a student/learner fails to successfully complete his/her pre-placement medical assessment/requirements, he/she will not be permitted to participate in a clinical or educational experience within the CCHS.
- It is the responsibility of each clinical program discipline to implement the policy and to draft and operationalize related procedure to the policy if applicable.
- Compliance with this policy will be monitored by the student's/learner's and visiting preceptor's academic institution and/or those responsible for student/learner placement within the CCHS.

## Health & Wellness Resources

The health and wellness of students/learners are key factors in ensuring a successful pathway to becoming future healthcare professionals while at Cleveland Clinic. As such, student/learners may access many of the same health and wellness resources available to CCHS caregivers as part of the Caring for Caregivers Staff and Employee Assistance Programs.

Resources available to students include, but are not limited to:

- Health screening examination
- Antibody titers
- Immunizations
- STI screening

To learn more about these resources and discounted costs for students/learners, contact the Caring for Caregivers office at 216-445-6970 or 1-800-989-8820 or visit [portals.ccf.org/caregivers](https://portals.ccf.org/caregivers).

## Mental Health Resources

Addressing mental health matters is an equally as important aspect of caring for our students'/learners' wellbeing.

The Caring for Caregivers Staff and Employee Assistance Programs offer assistance and support for students/learners in need of connecting with someone regarding mental health and personal safety concerns such as:

- Suicide Prevention or Self-harm
- Sexual Assault – Partner Violence
- Substance Abuse
- Anxiety Counselling
- Stress Relief Services

To learn more about these resources and discounted costs for students/learners, contact the Caring for Caregivers office at 216-445-6970 or 1-800-989-8820 or visit [portals.ccf.org/caregivers](https://portals.ccf.org/caregivers).

## Student/Learner General Health-Related Requirements

### General Requirements

Student/Learner Health requires attestation of the following for affiliated students:

- Medical and occupational history
  - COVID-19
    - Guidelines for Clinical Service at the CCHS during the COVID Pandemic (see Appendix)
    - COVID-Pass (see Appendix)
    - COVID-19. Affiliate Student Workflow (see Appendix)
    - COVID-19. Occupational Health-Internal HS Student Workflow (see Appendix)
  - Influenza
  - Screening for contagions identified by Occupational Health as posing a significant health risk to the clinical environment for which screening is necessary, such as COVID-19. Annually or as needed, the Director of Student/Learner Health shall inform Schools of any such significant health risks or requirements
- Immunization history
  - Blood test for Tuberculosis (TB)
  - Chest x-ray, if indicated
  - Urine Drug Screen - including testing for Cotinine (Nicotine Metabolite) are required by **some** programs.  
*\*For Nevada practice sites, testing for Cotinine is excluded pursuant to Nev. Rev.Stat. 613.333.*
  - Other assessments or immunizations as indicated based on the nature of the student's/learner's/visiting preceptor's clinical placement.

- These additional requirements will be communicated to Schools, or directly to students/learners and visiting preceptors, as appropriate.
  - Any individual who does not comply with these additional requirements will not be allowed to participate in a clinical or an educational experience within the CCHS.
- Clearance Requirements:
    - Student/Learners may begin participation on their start date upon successful completion of pre-placement requirements.

Non-compliance with any requirement will result in the student, learner, visiting preceptor not being able to participate in a clinical/educational experience within the CCHS.

### Student Immunization Policy

*To view the full Student Immunization Policy on the Intranet, [click here](#). You must be logged on through a Cleveland Clinic-issued device. Please be aware that CCF Policies are subject to revision. To ensure you are following the most up-to-date Policy, see link provided.*

### Purpose

This document outlines the process for annual immunizations of all students.

### Policy Statement

The Cleveland Clinic strives to protect patients, employees, employees' family members, students and the community through the immunization of all students, clinical instructors and preceptors.

### Definitions

**Cleveland Clinic health system:** Includes the main campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, South Pointe, Children's Hospital for Rehabilitation, and all Family Health Centers, Physician practice sites, Nevada practice sites, Emergency Departments, Express Care Centers, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

**Student:** A person enrolled in a Cleveland Clinic educational program, including in a health professions education program or a clinical rotation pursuant to an affiliation agreement with a School. Volunteers who do not receive academic credit for their service are not students.

**Visiting Preceptor:** A clinical instructor or preceptor who is not a Cleveland Clinic caregiver.

**School:** A school, college or university with which Cleveland Clinic has an affiliation agreement that provides for students to complete clinical rotations in the Cleveland Clinic health system.



**Flu Season:** As determined annually by Occupational Health, the period in which the flu is most common. Flu season is typically from November through March.

## **Policy Implementation**

### **A. Annual Influenza Immunization**

1. All students, regardless of age, and visiting preceptors, who are placed in the Cleveland Clinic health system (CChs) and receive a Cleveland Clinic identification (ID) badge for a planned clinical or educational experience during the flu season are required to receive an influenza vaccination in accordance with this policy.
2. Any student or visiting preceptor who does not comply with this policy will not be allowed to participate in a clinical or educational experience within the CChs during flu season. However, if such a student or visiting preceptor meets all other health and background check requirements, they may be provided a clinical or educational experience outside of flu season if available.
3. Students or visiting preceptors placed in the health system before or after the flu season begins must obtain the annual flu vaccine when it becomes available from their primary care provider (PCP), public clinics, pharmacies, etc. and provide evidence of receiving the flu vaccine to their School, or directly to the CChs employee responsible for student placement.
4. Students or visiting preceptors placed in the health system during the flu season must show evidence of receiving the flu vaccine to their School or CChs employee responsible for student placement before they are on-boarded into CChs.

### **B. Other Immunizations**

1. Every Cleveland Clinic educational program may establish requirements for additional immunizations based on the nature of a student's or visiting preceptor's clinical placement. These requirements will be communicated to Schools, or directly to students and visiting preceptors, as appropriate.
2. Any student or visiting preceptor who does not comply with these additional immunization requirements will not be allowed to participate in a clinical or educational experience within the CChs.

### **C. Exemptions**

1. Medical - Exemption to immunization may be granted by a student's/learner's school for medical contraindications.
2. Religious - Exemption to immunization may be granted by a student's/learner's school for religious beliefs.
3. Exemption requests will be communicated by students, visiting preceptors or Schools to Cleveland Clinic's education representative of the specific education program in which the student or visiting preceptor plans to participate. Generally, exemption requests granted by a student's/learners schools will be honored in a manner consistent those granted for Cleveland Clinic caregivers.
4. Note: No exemptions will be granted to shadowers or observers for Covid or Influenza vaccinations.

### **D. Payment for Immunizations**

1. Students and visiting preceptors are not eligible to participate in the Employee Cleveland Clinic Influenza Immunization Program and must obtain all vaccinations at their own (or their School's) cost.

#### E. Flu Vaccine Documentation

1. Schools will attest to student and visiting preceptor compliance with this policy. Students not affiliated with a School must show evidence that they received all required immunizations to the CChs employee responsible for student placement.

#### F. Internal Centers for Medicare & Medicaid Service (CMS) Reporting

1. Student Flu Vaccine compliance (CMS data) will be communicated to the Occupational Health Department by Protective Services.
2. Occupational Health is responsible for reporting CChs hospital student and academic instructor or preceptor data to CMS.

### Immunization History/Immunizations

- Student/Learner Health will screen for, or require attestation for evidence of immunity to the following diseases according to the recommendations of the Advisory Committee on Immunization Practices (ACIP).
  - Hepatitis B
  - Rubella (German measles)
  - Rubeola (measles)
  - Mumps
  - Varicella
- Individuals who are antibody negative to Rubella, Rubeola, Mumps, and Varicella-Zoster (VZV) are required to be vaccinated except if medically contraindicated.
- Hepatitis B Vaccine: Vaccination, proof of vaccination/immunity, or waiver is required of all individuals.
- Tdap Vaccination: Booster within the last ten years is required of all individuals.
- Influenza Vaccine: Incoming student/learners will be oriented in their pre-placement process as to the influenza vaccine requirement as a condition of participation. If placed during the identified flu season, the individual will need to receive the vaccine, have current documentation of vaccination, or have a medical or religious exemption from their school.

### Required Student/Learner and Preceptor Health Screenings and Immunizations

The following health screenings/immunizations are required for students/learners/preceptors in programs within the CCHS. **Requirements are subject to change to reflect current Cleveland Clinic Occupational Health Guidelines.**

**1. Hepatitis B IgG Antibody Titer – Positive**

- a. If titer is **not** positive:
  - i. 3 new dose of Hepatitis B Vaccine (0, 1, and 6 months) **AND**
  - ii. Anti-HBs serologic retest 6-8 weeks after final dose**OR**
  - iii. 2 doses of Heplisav-B Vaccine (at least 4 weeks apart) **AND**
  - iv. Anti-HBs serologic retest 6-8 weeks after final dose**OR** Waiver

**2. Measles (Rubeola) IgG Antibody – Positive**

- a. If titer is **not** positive:
  - i. 2 doses of MMR (0 and  $\geq$  28 days later)
  - ii. Repeat serologic test is not necessary

**3. Mumps IgG Antibody Titer – Positive**

- a. If titer is **not** positive:
  - i. 2 doses of MMR (0 and  $\geq$  28 days later)
  - ii. Repeat serologic test is not necessary

**4. Rubella (German Measles) IgG Antibody Titer – Positive**

- a. If titer is **not** positive:
  - i. 2 doses of MMR (0 and  $\geq$  28 days later)
  - ii. Repeat serologic test is not necessary

**5. Varicella (Chickenpox) IgG Antibody Titer – Positive**

- a. If titer is **not** positive:
  - i. 2 doses of Varicella Vaccine (0 and  $\geq$  28 days later)
  - ii. Repeat serologic test is not necessary

**6. Tetanus-Diphtheria-Pertussis (Tdap Renews every 10 years)**

- a. Documentation of Tdap during lifetime **AND**
- b. Documentation of adult Td booster or Tdap within past 10 years

**7. Tuberculosis (TB) Testing (or attestation of same within the previous 12 months) on entry whereby one of the following must be negative. Subsequently annual screening/testing is contingent on an Individual's TB Risk Assessment (see addendum).**

- a. 2-step Mantoux PPD at entry followed by annual 1-stp PPD,  
**-OR-**

- b. Previous 2-step Mantoux PPD with subsequent annual 1-step PPD screenings,  
**-OR-**
  - c. Serum T-Spot or QuantiFERON test annually,  
**-OR-**
  - d. In the event that an individual has had the BCG vaccination, then a serum T-Spot or QuantiFERON test needs to be performed annually
  - e. **If a TB Screen is Positive, the following is required:**
    - i. Negative chest X-ray radiology report within the past year AND a Negative TB Symptoms Review.
    - ii. If chest X-ray is **not** negative, one of the following is required:
      - 1. Confirmation of appropriately collected negative sputum results
- OR**
- 2. Proof of adequate treatment and medical clearance (free from communicable diseases) with appropriate follow-up as indicated by Provider
- AND** PRIOR TO CLINICAL OR PRACTICUM ASSIGNMENT

**8. Influenza Immunization: Single dose immunization (renewed annually) is required to participate in educational or clinical programs at Cleveland Clinic during flu season.**

**Important Information Regarding Additional Requirements:**

- *Some clinical sites may require additional health testing, immunization and/or titer requirements that are not reflected in this appendix. Program coordinators will notify students when aware of such additional requirements. Students, learners and preceptors assigned to clinical rotations or sites with additional requirements must comply.*
- *Documentation showing compliance with requirements must be provided to the program administrator to be uploaded to the appropriate portal. Students are advised to keep copies in case proof is required at the clinical site.*
- *Costs associated with additional requirements are the responsibility of the student.*

**Student/Learner Guidelines for Clinical Service at the Cleveland Clinic Health System during the COVID pandemic.**

Due to frequently changing COVID-19 guidelines for healthcare professionals, the workflow for handling instances when students/learners may be infected with or exposed to the virus are subject to change at any point.

### **Prior to any CCHS clinical or administrative site:**

1. If you are exhibiting symptoms commonly associated with COVID-19, do not come to the clinical site or hospital. Contact the **COVID-19 Hotline (216-445-8246)** for further assessment/possible testing. After consulting with the COVID-19 Hotline, notify Dr. Tizzano at 330-464-2111 or [tizzana@cff.org](mailto:tizzana@cff.org). Please contact your team and coordinator to let them know.  
If you are experiencing significant symptoms, then call 911 or go to an emergency department.

Symptoms of COVID-19 include:

- Fever (T > 100.4)
  - Cough
  - Myalgia
  - Shortness of breath
  - Diarrhea
  - Headache
  - New loss of smell or taste
  - Congestion or runny nose
  - Nausea or vomiting
2. If it is determined that you cannot have an in-person clinical experience due to illness, your program coordinator may explore virtual experiences based on the specific clerkship.
  3. Prior to returning for training or rotations, you must receive clearance from Dr. Tizzano. Your ability to report will be based on the CDCs recommended guidelines for healthcare professions and CCF policy.
  4. If you have a health condition that you think may preclude your re-entry into Clinical Care, please contact your program coordinator for assessment. They will use the current CDC and CCHS guidelines to make recommendations concerning potential accommodations.

### **Arriving to the facility/hospital campus or Family Health Center:**

1. Upon arrival to the Hospital or Family Health Center, you must enter through one of the approved employee doors. There will be signs directing you to the appropriate entrance. As you move about the hospital campus after initially arriving at the hospital, you can utilize other entrances with your team.

2. You are expected to wear a cloth or surgical mask on entry to a Cleveland Clinic HealthCare Facility. Please follow all PPE requirements of the Cleveland Clinic Health System. Updates to the guidelines are always posted on the Cleveland Clinic Intranet site.
3. Please remember to have your badge with you and clearly visible at all times, including upon entry to the hospital or clinic.

### **While on the facility/hospital campus after arriving:**

1. You must wear a mask at all times. The only exception is when eating/drinking, but you need to follow social distancing guidelines at that time. Patient care activities require a surgical mask and face shield (or goggles) when interfacing with a suspected or known COVID-positive patient. All updated PPE guidelines for Cleveland Clinic can be found on the Cleveland Clinic intranet home page. The COVID-19 Resources on the home page are an excellent resource for up-to-date information on many COVID related issues.
2. Caring for patients with known or suspected COVID-19 infections – unless otherwise indicated by your program, you may voluntarily participate in the in-person care of patients with suspected and confirmed COVID-19. Please ensure you follow all necessary precautions per CCF policies. We also want to emphasize that this is strictly voluntary, and you may opt out of seeing such patients without any repercussions. All Cleveland Clinic Rotation Directors have been notified about this policy. We require that you email your Clinical Coordinator when you are voluntarily seeing a known COVID+ patient (within 10 days from onset of symptoms).
3. If you become ill/symptomatic, you are to report this to the COVID-19 Hotline (216-445-8246), Dr. Tizzano (330-464-2111), and your supervising program coordinator. Subsequent assessment will determine the need for evaluation and testing. If you are feeling sicker and have symptoms such as chest pain or shortness of breath or other significant symptoms, then you should go to the emergency department.

*COVID-19 has become a community-acquired infection and the rate of hospital-acquired transmission is low. If you are exposed inadvertently, infection prevention/occupational health may make an attempt to contact you. It is recommended that you document in EPIC (e.g. progress note) on all patients for which you are providing direct care. The recommendation, in case of exposure, will be that you should continue to wear PPE at all times during your clinical duties, follow other disease prevention strategies (e.g. hand washing) and report any symptoms immediately. EPIC also allows you to keep a list of patients you have seen. This can be done if you feel it is necessary to self-monitor test results for patients you have seen.*

## Non-Employee Bloodborne Pathogen Exposure Standard Operating Procedure

To view the full Non-Employee Bloodborne Pathogen Exposure Standard Operating Procedure on the Intranet, [click here](#). You must be logged on through a Cleveland Clinic-issued device. Please be aware that CCF Policies are subject to revision. To ensure you are following the most up-to-date Policy, see link provided.

### Purpose

To outline the process for a non-employee, who experiences an exposure to blood or other potentially infectious materials during the transport of patients to Cleveland Clinic facilities or the performance of duties or training on Cleveland Clinic property.

### Definitions

**Cleveland Clinic Health System (excludes Nevada practice sites):** Includes the Main Campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, South Pointe, Children's Hospital for Rehabilitation, and all Family Health Centers, Physician practice sites, Emergency Departments, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

**Non-Employee:** Individuals who need access to Cleveland Clinic property who do not receive a pay check with a Cleveland Clinic logo on it. Such as Students, Volunteers, Contractors, Vendors, Observers, First Responders, and Licensed Independent Practitioners (LIP).

**Students:** Includes all students at Cleveland Clinic facilities participating in education programs approved by Cleveland Clinic.

**Academic Faculty:** Includes all faculty employed by academic institutions who are at Cleveland Clinic facilities and have students participating in education programs approved by Cleveland Clinic.

**Independent Contractor:** An Independent Contractor is defined as a worker who individually contracts with an organization to provide specialized or requested services on a project or as needed basis. Typically, an Independent Contractor maintains control over "how" the work will be done, and has an opportunity for profit/loss based on his or her own performance.

**Bloodborne Pathogens:** Pathogenic microorganisms that are present in human blood or other potentially infectious materials and may cause disease in humans. These pathogens include human immunodeficiency virus (HIV), hepatitis B virus (HBV) and hepatitis C virus (HCV).

**Bloodborne Pathogen Exposure:** A puncture, needle stick, or splash to a mucous membrane or non-intact skin contaminated with blood or other potentially infectious material from a source infected with human immunodeficiency virus (HIV), hepatitis B virus (HBV), or hepatitis C virus (HCV) that may result during the performance of a non-employee's duties or training.

**Blood:** Human blood, human blood components, and products made from human blood.

**Other Potentially Infectious Materials:** Semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, and body fluid that is visibly contaminated with blood. Includes unfixed tissue or organ from a human (living or dead) and blood, organs, or other tissues from experimental animals infected with HIV, HBV, or HCV.

**Feces, nasal secretions, saliva, sputum, sweat, tears, urine, vomitus, and breast milk are not considered potentially infectious unless they contain visible blood.**

**Licensed Independent Practitioner (LIP)** – A licensed provider acting within their scope.

### **Instructions**

A non-employee must notify his or her employer or academic program officials (students only) of the bloodborne pathogen exposure and comply with their policies and procedures. Occupational Health and Infectious Disease work in collaboration to identify potential or known bloodborne pathogen exposures and will participate in the following process where applicable.

### **Immediate First Aid**

#### **Wash:**

- For puncture, needle stick or laceration, clean site thoroughly with soap and water.
- For splash to eye(s) or mouth, thoroughly rinse with tap water, normal saline, or use eye wash station.

**REPORT THE EXPOSURE – Call 216.445.0742 (24/7 Bloodborne Pathogen Exposure (BBPE) HOTLINE) **this line is used for all hospitals****  
**No Safety Event Reporting (SERS) report required**

**Occupational Health Nurse will** review the exposure to determine need for source patient testing. If necessary, lab orders will be placed in EPIC to determine HIV, HBV & HCV status.

- Consent for HIV testing is included in the Patient Acknowledgement and Consent Form. Additional consent for post-exposure testing is not required per ORC 3701.242 section E <http://codes.ohio.gov/orc/3701>.
- If the source patient is alert, the patient's Nurse is recommended to discuss post-exposure testing with the patient.
- There is **no charge** to the source patient for these tests.
- The non-employee will be notified as source patient lab results become available.
- If the source patient is known HIV positive, or the Rapid HIV is positive, the exposed non-employee will be advised to seek an immediate evaluation for HIV



prophylaxis and will be referred to the Emergency Department (ED) if employer or academic program follow-up process unknown.

- Source patient will not be notified unless lab results are positive and the diagnosis was not previously established.
- Occupational Health Nurse will provide written disclosure of source patient lab results to the non-employee when available. The exposed non-employee will be advised to notify their primary care provider of the incident and discuss follow-up tests and treatment.
- The case will be closed after review of the event, disclosure of source patient lab results to the exposed non-employee, and documentation is completed.

### **Important**

Non-employees are expected to have health insurance. Non-employees and/or their insurers are responsible for any medical expenses related to disease or injury incurred during the performance of duties or training on Cleveland Clinic property. This includes initial screening tests or prophylactic medical treatment as a result of an exposure to blood and other potentially infectious body fluids. Source patient blood work results are confidential. Unauthorized review of test results is considered a breach of patient confidentiality and grounds for corrective action, up to and including termination.

### **Additional Internal and External Resources**

#### *External*

[Updated U.S. Public Health Service Guidelines for the Management of Occupational Exposures to HBV, HCV, and HIV and Recommendations for Postexposure Prophylaxis](#)

[Occupational Health & Safety Administration Bloodborne Pathogen Standard 1910.1030](#)

#### *Internal*

*To view the CCF Policies listed below, you must be logged on through a Cleveland Clinic-issued device. Please be aware that CCF Policies are subject to revision. To ensure you are following the most up-to-date Policy, see links provided.*

[Employee Occupational Exposures to Bloodborne Pathogens Policy](#)

[Bloodborne Pathogens Post Exposure Procedure](#)

[Infection Prevention for Volunteer Services Policy](#)

### **Student Substance Abuse Policy**

*To view the full Student Substance Abuse Policy on the Intranet, [click here](#). You must be logged on through a Cleveland Clinic-issued device. Please be aware that CCF Policies are subject to revision. To ensure you are following the most up-to-date Policy, see link provided.*

## **Purpose**

The purpose of this policy is to define prohibited behavior with regard to the possession, diversion and/or use of alcohol and/or drugs by students and to provide information on how to address instances of suspected possession, diversion and/or use of alcohol and/or drugs by students.

## **Policy Statement**

Cleveland Clinic is committed to maintaining a safe, healthful and efficient working and learning environment for its students, trainees, employees, patients and visitors. Consistent with the spirit and intent of this commitment, Cleveland Clinic prohibits:

- A. The unlawful or unauthorized use, manufacture, possession, sale, or transfer of illegal drugs and/or controlled substances on Cleveland Clinic premises.
- B. Reporting to any learning or clinical environment impaired or under the influence of any illegal drug, controlled substance, and/or alcohol.
- C. Consumption of alcohol (except at approved or sponsored Cleveland Clinic functions) on Cleveland Clinic premises.
- D. Improper self-medication of over-the-counter or prescribed drugs on Cleveland Clinic premises.

## **Definitions:**

**Cleveland Clinic United States locations:** Includes the main campus, Avon, Euclid, Fairview, Cleveland Clinic Florida, Cleveland Clinic Hospital (Weston), and all Family Health Centers, Physician practice sites, Nevada practice sites, Emergency Departments, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

**Cleveland Clinic Premises:** all Cleveland Clinic buildings, other buildings where Cleveland Clinic employees work, parking garages, parking lots or other open areas owned or under control of Cleveland Clinic, in any Cleveland Clinic vehicle, or at any other location while on Cleveland Clinic business.

**Affiliate School:** An educational institution with which Cleveland Clinic has an affiliation agreement through which enrolled students of the institution participate in Cleveland Clinic's educational programs or activities.

**Affiliate Student:** An affiliate student is a participant in a Cleveland Clinic educational program or activity who is enrolled in an affiliate school.

**Diversion:** the unauthorized removal of a controlled substance from a patient and/or patient care setting.

**Educational Program or Activity:** Any program or activity offered at Cleveland Clinic or by Cleveland Clinic employees in the scope of their duties that is educational in nature beyond on-the-job training, general interest, or routine continuing education

programs. Factors in determining whether a program or activity is educational include whether it is structured through a particular course of study; whether participants earn academic credit toward a degree or certificate, or qualify to sit for professional exams; or whether a program provides instructors, exams or other evaluation process. Educational programs and activities include, without limitation, degree- or certificate-granting programs offered by Cleveland Clinic and affiliated colleges and universities; clinical rotations for degree- or certificate-granting programs; medical and other residency programs; research and medical fellowships; internships; and educational programs offered to middle school, high school, college and university students.

**Illegal Drugs and Controlled Substance:** any substance which in any manner alters normal perception, thought functions, behavior or mood, including, but not limited to marijuana (regardless of whether it is prescribed medical marijuana), cocaine, narcotics, tranquilizers, amphetamines and barbiturates.

**Impairment:** The effect of the use of alcohol or any psychoactive or mood-altering substance on mental, emotional and/or physical functioning Symptoms may include, but are not limited to, drowsiness and/or sleepiness, odor of alcohol on breath, slurred/incoherent speech, unusually aggressive or bizarre behavior, unexplained change in mood, lack of manual dexterity, lack of coordination in walking, unexplained work related accident or injury. Prohibited impairment may also be asymptomatic yet result in a positive test.

**Improper Self Medication:** includes, but not limited to, using drugs prescribed to someone else, using drugs at other than the prescribed dose, or using over-the-counter medication in a manner not in accord with the manufacturer's instructions.

**Program Leadership:** For the purposes of this policy, refers to the administrators of a student's educational experience or program. Program leadership includes program directors, education coordinators, preceptors and other Cleveland Clinic employees with the authority to address misconduct in a program/educational experience.

**Student:** For the purposes of this policy, a student is a person enrolled in a Cleveland Clinic educational program or activity who is not employed by Cleveland Clinic. The term "student" includes affiliate students and trainees who are not employed by Cleveland Clinic.

**Trainee:** For the purposes of this policy, an individual who participates in an educational program or activity as a resident, fellow or scholar. Examples of job titles that denote trainees include resident, clinical fellow, clinical research fellow, research fellow, postdoctoral fellow, postdoctoral research fellow, postdoctoral psychology fellow, special fellow, clinical scholar, research scholar, and clinical institute research scholar.

## **Policy Implementation**

### **Scope**

This Policy applies to students, as that term is defined herein. Individuals who are employed by Cleveland Clinic are subject to the Substance Abuse Policy even if they are also enrolled in a Cleveland Clinic educational program or activity. If program leadership learns of the impairment of a student who is also an employee, they shall consult with Human Resources to implement the Substance Abuse Policy.

### **Voluntarily Seeking Assistance**

Cleveland Clinic recognizes that substance abuse/dependency is a progressive, chronic, disease that has adverse effects on both the student's quality of life and job performance. However, substance abuse/dependency is treatable and early recognition and treatment is advisable. Students who suspect they may have a problem with substances are encouraged to voluntarily seek assistance. Cleveland Clinic will provide reasonable academic accommodations for students who are diagnosed with substance abuse/dependency.

### **Programs of Education, Prevention, Treatment and Support**

Cleveland Clinic provides programs of education, prevention, treatment and support to encourage a drug-free learning environment/lifestyle.

### **Reasonable Suspicion of Impairment, Possession or Diversion**

All students may be subject to urine and/or breath testing when reasonable suspicion exists that the student is in an impaired condition and/or under the influence of drugs and/or alcohol on Cleveland Clinic premises. For the purpose of this policy, a reasonable suspicion of impairment exists: (1) when the student exhibits aberrant behavior and/or the type of behavior that shows symptoms of intoxication or impairment caused by drugs and/or alcohol; and (2) the behavior cannot reasonably be explained by other causes.

If an employee develops a reasonable suspicion that a student is impaired while on Cleveland Clinic premises, the employee will report their suspicion to the student's program leadership. The student's program leadership will notify the student of the need for immediate evaluation and testing. A reasonable suspicion referral for evaluation/testing will be made on the basis of documented objective facts and circumstances that are consistent with the effects of substance abuse or alcohol misuse. Program leadership will contact Occupational Health or a designated testing location for evaluation and/or testing and shall accompany the student to the location of their evaluation and testing. [The Substance Abuse – Reasonable Suspicion or For Cause Testing Procedure](#) includes information on regional testing locations.

All students may be subject to an appropriate search on Cleveland Clinic premises when reasonable suspicion exists that a student is in improper possession of alcohol,

illegal drugs and/or a controlled substance or may have diverted a controlled substance. If an employee develops a reasonable suspicion that a student is in improper possession of alcohol, illegal drugs and/or a controlled substance or may have diverted a controlled substance, the employee will report their suspicion to the student's program leadership. The program leadership shall contact Cleveland Clinic Protective Services to perform appropriate searches and investigation.

### **Refusal to Comply**

Any student refusing to comply with a lawful evaluation, test or search, or otherwise failing to cooperate with an investigation conducted in accordance with this policy will be subject to removal from Cleveland Clinic premises and subject to disciplinary action up to and including dismissal from their program/educational experience.

### **Safe Transportation**

Program leadership will arrange for transportation for the student to their home when the program leadership has reasonable suspicion that the student is impaired. The Cleveland Clinic Police Department/ Hospital Security can be contacted to obtain cab vouchers and also for consultation. If the student refuses transportation assistance, program leadership should document the fact and notify the Cleveland Clinic Police Department. Because of the safety implications of reasonable suspicion of impairment, refusal to accept safe transportation arrangements may result in discipline up to and including dismissal from the program.

### **Violation of Policy**

Any student who is found to be in violation of this policy is subject to disciplinary action up to and including dismissal from their program/educational experience. A student may be suspended from participation in their program/educational experience pending the outcome of an investigation. An affiliate student's program leadership will inform an affiliate school of any actions taken under this policy.

### **Confidentiality**

Student information related to this policy (e.g., reasonable suspicion of impairment, medical evaluation results, etc.) shall be held as confidential as reasonably possible consistent with program leadership's responsibilities under the policy and any reporting obligations required by law.

### **Regulatory Requirement/References**

### **Oversight and Responsibility**

Education Institute is responsible to review, revise, update, and operationalize this policy to maintain compliance with regulatory or other requirements. It is the responsibility of each hospital, institute, department, educational program and activity

and discipline to implement the policy and to draft and operationalize related procedures to the policy if applicable.

## **Minors**

Occupational Health will, based upon the clinical experience/setting, determine the required pre-placement screenings for minors under the age of 18. The Occupational Health Parent/Guardian Consent for Minors Form must be completed and signed prior to the medical screening. The form can be obtained through Occupational Health.

## Appendix

### A. Hepatitis B Vaccination/Titer Waiver



## Hepatitis B Vaccination/Titer Waiver

Student Name: \_\_\_\_\_  
(Please print!)

Date: \_\_\_\_\_

School: \_\_\_\_\_

Program \_\_\_\_\_

**Hepatitis B Series** is **HIGHLY RECOMMENDED** for any student enrolled in a health related field where there is risk of exposure to blood or other potentially infectious materials.

I, \_\_\_\_\_, understand during my student training that I may be exposed to blood or other potentially infectious materials and may be at risk of acquiring hepatitis B virus (HBV) infection. However, I decline Hepatitis B vaccination or Hepatitis B antibody titer at this time, as indicated below. I acknowledge and assume the risks associated with my voluntary decision to decline Hepatitis B vaccination or Hepatitis B antibody titer. I waive any and all claims, known or unknown, against Cleveland Clinic Foundation, its agents, assigns and affiliates (collectively, "CCF") stemming from this decision. I further hold harmless and indemnify CCF for any such claims."

**I am declining (circle one): *Hepatitis B vaccination -or- Hepatitis B antibody titer***

\_\_\_\_\_  
Student Signature

\_\_\_\_\_  
Date

Revised: 1/31/2023

Last updated: 1/31/2023