



School of Phlebotomy

Program Handbook

2023-2024

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MISSION AND VISION

THE MISSION OF THE CLEVELAND CLINIC

To provide better care of the sick, investigation into their problems, and further education of those who serve

THE MISSION OF THE CLEVELAND CLINIC SCHOOL OF PHLEBOTOMY

To provide the highest quality classroom and laboratory education preparing students to be proficient stewards in the field of phlebotomy.

THE VISION OF THE CLEVELAND CLINIC SCHOOL OF PHLEBOTOMY

To sustain excellence in the practice of phlebotomy through the study of current theory and practice supporting world class care.

TERMS AND ACRONYMS

LES – Lab Education Specialist

RT-PLMI – Robert J. Tomsich Pathology and Laboratory Medicine Institute

PBT – Phlebotomy Technician

THE ROBERT J. TOMSICH PATHOLOGY AND LABORATORY MEDICINE INSTITUTE ORGANIZATIONAL STRUCTURE

Brian Rubin, MD, PhD

Robert J. Tomsich Pathology and Laboratory Institute, Chair

- The Two Departments of the Institute
 - Laboratory Medicine
 - David Bosler, MD, *Department Chair*
 - Pathology
 - John Goldblum, MD, *Department Chair*
- The Center for Pathology Education
 - Sean Williamson, MD, *Vice Chair Education, RT-PLMI*
 - Paul Suchy, DM, MSM, MT(ASCP), *Administrator, Center for Pathology Education*

PROGRAM FACULTY AND ADMINISTRATION

DIRECTORS

TBD

Medical Director, School of Phlebotomy

Gerald Hicks, MBA, MLT(AMT), PBT(ASCP)^{cm}

Program Director, School of Phlebotomy

ADVISORY BOARD

Sherri Flax, MD

Vice Chair RT-PLMI, Regional Pathology

Medical Staff representation

Dena Allen, MBA, MLS (ASCP)^{cm}

Administrator, Center for PreAnalytics, RT-PLMI

Administration Representation

Teresa Duncan, AAS, CMA (AAMA)

Medical Assistant Student Coordinator, Cleveland Clinic

CC Allied Health Program representation

Celeste L Dean-El, MS, SBB (ASCP)^{cm}

Regional Director, Immunohematology Reference Laboratory, American Red Cross

Regional Laboratory Representation

Maxine Ratcliff-Johnson, BA, PBT (ASCP)^{cm}

Program Director, Regional Pathology Education, RT-PLMI

Pathology Education representation

Michelle Wasuk, MT (ASCP)

Administrator, FHC Labs, RT-PLMI

FHC Management representation

Amy Cocco, MD

Public Member At Large

The Cleveland Clinic School of Phlebotomy's Advisory Board is a representative group of the school's community of interest. The Advisory Board's purpose is to provide the structure to integrate quality throughout the program, implement measures to ensure the program educates students to excel in academic achievement, and help ensure continued successful academic and professional outcomes. In this way it helps to ensure the quality of the program and its graduates. The Advisory Board meets twice a year. Minutes are kept at each meeting.

CLEVELAND CLINIC SCHOOL OF PHLEBOTOMY PROGRAM INFORMATION

The program is designed to train students who have received a high school diploma or GED in Phlebotomy.

PBT students are classified as part time (10-40 hours per week), temporary students in a Cleveland Clinic sponsored program. This entitles students to receive a parking assignment, access to laboratory supplies, and instructor and Program Director time.

Students' performance (both at the Cleveland Clinic and on certification exams) is used by accreditation agencies, prospective students, future employers of our graduates, and the Cleveland Clinic itself to judge the quality and value of our program.

ADMISSIONS CRITERIA

The School of Phlebotomy seeks student applicants who match personal attributes with those required for practice of phlebotomy.

Applicants must demonstrate a capacity for academic achievement:

- High School Diploma or GED
- Minimum high school GPA of 2.5 or previous college course work

Applicants where English is their second language must have a TOEFL score of 70 for program acceptance.

Desirable Attributes of Applicants:

- Logical thought processes facilitating problem solving
- Strong oral and written communication skills
- Dependability and a sense of responsibility
- Courtesy and respect in personal relationships
- Internal motivation
- Integrity
- Maturity
- Interests or hobbies that enrich personal satisfaction
- Ability to follow directions
- Ability to react appropriately and to maintain poise and control under stressful conditions
- Manual dexterity

ACADEMIC REQUIREMENTS

Applicants are required to have obtained a high school diploma or GED.

SELECTION PROCESS

- When all of the application materials items listed on the website have been submitted, the applicant's academic qualifications are evaluated.
- Applicants meeting the minimum criteria *may* be contacted to make an appointment for a personal interview. Please note that meeting the minimum criteria does not guarantee an interview.
- If you are contacted, a personal face-to-face onsite interview is preferred, phone or virtual interviews will be considered.. Exceptions may be made under some circumstances. This will be decided by the Program Director on a case-by-case basis.
- Letters of Recommendation are not required, but will be accepted. Letters will be reviewed prior to selecting a candidate for an interview. They are not considered in the overall scoring of the applicant.
- It is the responsibility of the applicant to see that deadline for submitting applications and other application materials is met.
- After the interview, each applicant who has completed the process will be scored on non-academic characteristics, using information gathered from the application form and interview.
- The relative weights given to each source of information are:
 - Academic criteria: 20 percent of total score
 - Non-academic criteria
 - Application form: 30 percent of total score
 - Interview: 50 percent of total score
- Acceptable applicants will be ranked and selected in order of their total scores.

NON-ACADEMIC REQUIREMENTS

In addition to academic requirements, students must meet the following:

- Documented proof of medical insurance coverage in case of accident or injury during the program
- Documented proof of negative two-step TB test, T Spot, or Quantiferon Gold test within one year of the start of the program
- Documented proof of appropriate immunizations for measles (Rubeola), mumps and German measles (Rubella)
- Documented proof of appropriate immunization for chicken pox (Varicella) OR a letter from a physician that states when the student had chicken pox
- Documented proof of the DT (Diphtheria/Tetanus) or DTaP (Diphtheria/Tetanus/Polio) booster within the last 10 years
- Documented Hepatitis B titer or signed waiver assuming the risk of exposure

- Documented proof of the Influenza vaccine within the last year (can be completed during the clinical year)
- Documented proof of Covid-19 vaccination (2 doses Moderna/Pfizer, 1 dose Johnson & Johnson)
- Negative background check, or a positive background check that is approved by Cleveland Clinic Protective Services.

Proof of immunity can be demonstrated with vaccination records or by titers, with the exception of Hepatitis B, which must be a titer.

ESSENTIAL REQUIREMENTS

In addition to the Program’s academic demands there are non-academic demands. Every applicant is expected to meet these requirements in order to participate in the Program.

PHYSICAL AND MOTOR SKILLS

Students must:

- Have fine motor dexterity to collect patient samples, use a microscope, and operate and repair laboratory equipment
- Have gross motor dexterity to process samples, physical mobility to collect blood specimens from patients, and stamina to tolerate a physically demanding workload
- Be able to stand for long periods of time and maneuver through crowded spaces to collect specimens

SENSORY/OBSERVATIONAL SKILLS

Students must:

- Be able to participate in lab and clinical practical demonstrations
- Have visual acuity sufficient to distinguish red, yellow, and blue colors; distinguish clear from cloudy; distinguish objects through a microscope.
- Be able to view computer screens for extended lengths of time

COMMUNICATION SKILLS

Students must:

- Be able to communicate in English, both verbally and in writing to all staff, employees, students, patients and other healthcare workers
- Be able to complete written assignments and participate in classroom discussions

INTELLECTUAL AND QUALITATIVE SKILLS

Students must:

- Have the ability to organize their work, solve problems, think critically, and make appropriate judgments

PROFESSIONALISM AND SOCIAL BEHAVIOR

Students must:

- Have the ability to follow directions, manage time, and meet deadlines
- Be able to function as part of a team and act as a professional
- Have the ability to work under pressure, maintaining a calm demeanor and demonstrating maturity
- Be able to adhere to the regulations of accrediting agencies, comply with safety regulations of the laboratory and maintain a safe environment for themselves and others
- Be able to act as a professional by wearing appropriate dress, using proper behavior and maintaining personal honesty and integrity.
- Be able to demonstrate the emotional health required for full utilization of the applicant's intellectual abilities.
- Be able to recognize emergency situations and take appropriate actions.

NONDISCRIMINATION STATEMENT

Cleveland Clinic is committed to providing a working and learning environment in which all individuals are treated with respect and dignity. It is the policy of Cleveland Clinic to ensure that the working and learning environment is free from discrimination or harassment on the basis of race, color, religion, gender, sexual orientation, gender identity, pregnancy, marital status, age, national origin, disability, military status, citizenship, genetic information, or any other characteristic protected by federal, state, or local law. Cleveland Clinic prohibits any such discrimination, harassment, and/or retaliation.

Any participant in a Cleveland Clinic educational program, including any student, trainee or employee, who may have been subject to discrimination on the basis of a protected characteristic is encouraged to make a report.

Reports of discrimination on the basis of sex, gender, sexual orientation, and gender identity or gender expression may be made to the Title IX Coordinator. Please visit the Title IX Internet Site for additional information and/or send an email to TitleIX@ccf.org

Reports of discrimination on the basis of a disability, may be made to the Section 504 Coordinator, Main Campus JJ40.

Reports of discrimination on the basis of any other protected characteristic may be made to the Office of Educational Equity at EduEquity@ccf.org.

In addition, Cleveland Clinic shall provide reasonable accommodations to any qualified student with a disability in order for the student to have equal access to their program. Students needing a reasonable accommodation in order to apply to or participate in the program should contact the program director as early as possible.

DIVERSITY STATEMENT

RT-PLMI, the Cleveland Clinic and the Center for Health Sciences Education are committed to valuing all people through our organization, regardless of background or culture. A diverse and inclusive environment for students and staff and culturally appropriate care for our patient, are essential to fulfilling our vision to be the best place for care anywhere and the best place to work in healthcare. We welcome students from diverse backgrounds and cultures.

PROGRAM GOALS, OBJECTIVES AND EXPECTATIONS

Behaviors demonstrated by students are expected through their course of training and as they assume a role in the clinical laboratory as a phlebotomist.

Ethical behavior – Students conduct themselves with honor and do not cheat or falsify academic information or laboratory data at any time

Respect – students make every effort to maintain effective relationships and communication with their peers, instructors and laboratory staff

Diligence – Students strive to be on time, prepare daily, complete assignments and apply themselves to study

Knowledge – Students assimilate the knowledge required to achieve competency as a phlebotomist

Integrity – Students follow required lab practices and maintain an organized work space

Judgment – Students exercise their best judgment in analysis and problem-solving

Competency – Students sustain grades to remain in good standing in the program

Quality – Students are mindful that quality in all phases of school or work is essential and is foundational to accurate diagnostics and the best patient care

Certification – Students pass a certification examination on completion of studies and maintain certification throughout their career

Continuous learning – Students commit to the personal responsibility of keeping abreast of new information and practice

Upon successful completion of the Cleveland Clinic School of Phlebotomy program, the graduate will be able to:

- Demonstrates the concepts of communications involving both personal and patient interaction. Communicate ideas effectively in oral and written form; use electronic methods to communicate, collaborate and disseminate information.
- Perform proper infection control techniques and safety measures to protect patient, co-workers and community.
- Apply knowledge of the anatomy and physiology of body systems and medical terminology in relation to general pathologic conditions associates with the body systems. Apply disease states and conditions in relation to specimen collection for clinical lab testing.
- Demonstrate proper techniques using appropriate equipment to perform venipuncture and capillary puncture while maintaining quality assurance during and after specimen collection.
- Demonstrate proper techniques using appropriate equipment to perform specimen processing while maintaining specimen integrity.
- Explain and apply appropriate functions of Point of Care Testing.
- Demonstrate a professional attitude in all interactions, maintain a willingness and enthusiasm to learn and accept instruction and suggestions in a positive, constructive manner, and continue to develop themselves professionally.
- Practice medical and professional ethics and apply the understanding of legal implications involving phlebotomy practice.
- Meet eligibility requirements to sit for American Society for Clinical Pathology (ASCP) Board of Registry Examination or equivalent

PROGRAM COURSE DESCRIPTIONS

The program curriculum is comprised of both didactic and laboratory sessions with emphasis on clinical hands-on opportunity. Students take written and practical examinations frequently throughout the program.

The School of Phlebotomy uses a blended learning approach. The majority of the work is currently completed in a face to face classroom or laboratory setting with examinations and supplemental resources available online. .

Course Name	Course #	Credits
Phlebotomy I (PBT)	2001	40 clock hours
Phlebotomy II (PBT)	2002	40 clock hours
Phlebotomy Clinical		160 clock hours

PHLEBOTOMY I (2001), CLOCK HOURS: 40

Lectures present the principles of phlebotomy equipment and venipuncture techniques. Additional lectures will cover review of phlebotomy history and health care setting, medical terminology, anatomy and physiology with emphasis on circulatory system. Laboratory work emphasizes phlebotomy technique using multisample needle, syringe, and butterfly collections while procuring a quality blood sample for patient testing.

Upon completion of lectures, quizzes, and laboratory assessments, the student will be able to demonstrate the proper phlebotomy technique using the proper equipment. The student will also be able to apply medical terminology, anatomy/physiology knowledge when reviewing test orders for sample collection.

PHLEBOTOMY II (2002), CLOCK HOURS: 40

Lectures present the principles of capillary and special collection techniques. Additional lectures will cover point of care testing, specimen handling, non - blood specimens, arterial punctures. Laboratory work emphasizes capillary and aseptic techniques of blood collection. Principles of specimen handling, specimen processing and point of care testing are also emphasized.

Upon completion of lectures, quizzes, and laboratory assessments, the student will be able to demonstrate aseptic technique of blood collection, capillary collection. The student will be able to explain the proper methods of specimen handling, specimen processing, and point of care testing.

PHLEBOTOMY CLINICAL, CLOCK HOURS: 160

Hands on phlebotomy experience provided at assigned location within Cleveland Clinic Enterprise. During this clinical rotation, phlebotomy students will have the opportunity to obtain patient samples in both an inpatient and outpatient setting, while being exposed to all types of patients (geriatric, pediatric). Students are also be provided clinical time in specimen processing areas at their assigned clinical location. Students will have 160 hours of clinical time along with a minimum of 100 unaided venipuncture collections. Clinical grade is included within weighted calculation for Phlebotomy II.

TEXTBOOKS

Students are responsible for purchasing their own textbooks. A list of required texts is provided to each student prior to the start of the program.

The following table lists the required textbooks for the 2022 school year:

Title	Author	ISBN	Publisher
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<i>Rodak's Phlebotomy Essentials 7th Edition</i>	McCall, Ruth E	1-284-20994-5	Jones & Bartlett Learning
<i>Student Workbook for Phlebotomy Essential 7th Edition</i>	McCall, Ruth E	978-1-284-2101-4	Jones & Bartlett Learning

ACCREDITATION

The Cleveland Clinic School of Phlebotomy program is pursuing approval by the National Accrediting Agency for Clinical Laboratory Sciences (NAACLS).

Further information can be obtained by contacting NAACLS at 5600 N. River Road, Suite 720, Rosemont, IL, 60018, by phone at 773-714-8880 or by visiting the NAACLS website at www.naacls.org. It is also approved by the Committee on Allied Health Education and Accreditation.

GRADUATION REQUIREMENTS

Acceptable performance in all courses must be achieved in order to complete the program. A student must complete the entire program to be eligible to sit for any certification examination. This includes satisfactory academic and laboratory performance along with satisfactory completion of the comprehensive final examinations. Criteria for acceptable performance are determined by the student's performance throughout the entire program. The criteria are outlined in the Student Academic Standards section of this handbook.

Successful completion of the program entitles the graduate to a Certificate of Completion from the Cleveland Clinic School of Phlebotomy. The Certificate of Completion allows a student to apply for phlebotomy certification from national certifying agencies. Passing a national certification exam is not required for a Certificate of Completion from the School of Phlebotomy.

There is no option in this program for advanced placement to bypass any coursework. Because the Cleveland Clinic is not a degree granting institution, the credits earned in this program cannot transfer to any other institution. All coursework and learning experiences must be completed during the program. For this reason, students cannot earn credit for experiential learning, even if they have experience working as a phlebotomist.

CERTIFICATION EXAMS

Graduates are eligible to sit for certification examinations given by the Board of Certification (BOC) of the American Society of Clinical Pathologists (ASCP).

The ASCP BOC certification examination is given throughout the year. The BOC is the oldest and largest certification agency for laboratory professionals having certified more than 560,000 individuals since its establishment. It has become the gold standard for certification of medical laboratory personnel.

Detailed information regarding application, eligibility and testing sites can be found on the ASCP website at www.ascp.org.

PROGRAM OUTCOMES (TBD)

Year	Graduation Rate	Job Placement	BOC First-Time Pass Rate	Attrition Rate

TUITION PAYMENTS AND REFUNDS

Tuition for the program is \$1000. The cost of additional books, health insurance, and living expenses is paid by the student.

Please see tuition refund schedule below.

Withdraw period	Tuition owed	Tuition refunded
End of week 1	25%	75%
End of week 3	50%	50%
End of week 5	75%	25%

OTHER EXPENSES

- Textbooks – approximately \$100, unless provided by program.
- Supplies – notebooks, shoes, etc.
- Scrubs – Students will be provided two pairs of scrubs (gray or red). Any additional scrubs must be purchased by the student.
- Medical insurance
- Vaccinations or lab tests proving immunity.

IMPORTANT TELEPHONE NUMBERS

Medical Emergencies:

Code Blue (individual not breathing, pulseless, or unresponsive)	111
Medical Emergency Team (MET) [all other requests for medical help]	122
Security Emergency	42222

PROGRAM CONTACT NUMBERS:

School of Phlebotomy	216.372.6861
Gerald Hicks, Program Director	216.372.6861

STUDENT PROFESSIONAL APPEARANCE

- Scrubs must be worn on a regular basis, no white or ceil blue scrubs may be worn. Red scrubs will be provided.
- Colors unnatural to human hair (e.g., purple, pink, green, blue) are not permitted. If hair is longer than shoulder length, it must be pulled back when working in the clinical labs or student lab.
- No hats or caps are permitted during working hours. Head coverings for medical, cultural or religious reasons are exempt from this rule.
- No more than two piercings in each ear. All other piercings must be removed or covered during working hours. Small nose stud piercings are acceptable, with the exception of septum or rings.
- Shoes must cover the entire foot, have non-slip soles and be made of non-absorbent material.
- Disposable, nonabsorbent lab coats are worn while in the laboratory area.
- The student ID Badge should be worn above the waist and with the photo ID facing outward.
- Good personal hygiene is expected of all students.
- The hospital recognizes that exposure to strong scents and fragrances in the environment can be offensive to others and/or may trigger allergic reactions. Therefore, the use of minimally scented perfumes, colognes, and other fragrance products should be used with discretion and with sensitivity to others in the laboratory area.
- Failure to adhere to standards of dress and grooming will result in progressive disciplinary action. The Program Director may require students to remove, modify or cover any attire that is inconsistent with a professional work/school environment.

SCHOOL CALENDAR

The Academic Calendar begins with the start of the Fall session and ends with the Summer session. Academic Sessions are held three times a year in January, May, and September. Please reach out to Program Director for exact start dates as they will change with each Academic year.

Total Length of program: approximately 12 weeks

Holidays:

- New Year's Day
- Memorial Day
- July 4th
- Labor Day
- Thanksgiving
- Christmas

STUDENT EMPLOYMENT AND SERVICE

STUDENT PART TIME EMPLOYMENT

Students may be employed during the program as long as the following conditions are met:

Student employment must be outside the regular Program hours. It is strongly recommended that a student work less than 30 hours per week while in the Program.

- Work hours or responsibilities must not interfere with academic hours or activities.
- The student must maintain acceptable performance in all areas (academic, technical, professional) as defined in acceptable performance policies.

Students must be able to remain flexible in their program start times and end times as required by any unique situations during the program rotations.

If these conditions are not met, the student may be asked to resign from their work position or drop out of the program.

STUDENT SERVICE WORK

All phlebotomy performed by students in a clinical setting will be supervised by competent laboratory employees.

Students will not assume the responsibility, nor take the place of, employees in the clinical laboratory. It is recommended, however, that after demonstrating competency in laboratory procedures, students be permitted to perform selected laboratory procedures under careful supervision to develop speed, confidence and ability to organize and work efficiently under pressure.

ATTENDANCE

Students are expected to be in attendance Monday and Thursday from 10am to 2:30pm for classroom experience. Clinical experience hours are Monday – Friday, 8am to 4:30pm

- **Exceptions:** Some laboratory areas may require a start time of 7:00 am or evening hours for clinical experience.
- **Lunch:** There is a 30 minute lunch break during the 8 week didactic session. A lunch break will be provided during clinical experience. Students are expected to follow the schedule of their preceptor.
- **Breaks:** Additional breaks throughout the day will change based on whether the student is in the didactic or clinical experience portion or the semester. Breaks are not guaranteed and are dependent on the learning activities for the day.
- **Staying Late:** Some laboratory work may require staying beyond to complete the laboratory work or assignment.

EXPECTATIONS

Phlebotomy students are training to become professionals. It is, therefore, reasonable to expect each student be in attendance 12 hours per week during lecture/lab sessions and 40 hours for clinical experience. The idea is for student to start developing attitudes, habits, and characteristic of professionals. Maintaining a stable and reliable work force is critical to the effective and efficient delivery of health care services. Excessive tardiness and absenteeism negatively affect patient care and employee morale and are considered unacceptable.

A student's general attitude, attendance record, and promptness are heavily considered when judging dependability and willingness to accept responsibility. It is anticipated that a student will want to seek employment at the Cleveland Clinic when training is completed and the impression they make on the staff and employees in various departmental rotations will be taken into consideration when hiring decisions are made. In any case, attendance is an important consideration wherever one may seek employment.

It is the responsibility of the Phlebotomy student to:

- Attend ALL scheduled lecture and laboratory sessions, arriving on time and demonstrating respect for the speaker/instructor and an interest in the material being presented. All learning activities are mandatory, unless the program director decides otherwise.
- Prepare ahead of time for every lab or lecture. Most course materials are online and students are expected to maximize class time by reviewing and learning the material prior to the lecture/lab.
- Use any spare time during the scheduled day working on assigned projects or studying, without the expectation of regular time out of the laboratory for this activity.
- Be in attendance AND available between the scheduled hours of class periods every day.
- Be patient and flexible, remembering patients first. An instructor may be immersed in patient work and unavailable to work with students at the exact time noted on the class schedule. Students are encouraged to assist with the task at hand, if possible.

- Make a reasonable attempt to report as scheduled despite inclement weather conditions.
- Be available at all times during the day. Breaks are not to be used for activities that should be done on personal time such as going to the gym.

Absences are classified as Excused, Unexcused, or Tardy/Leave Early. Students must send an **EMAIL** to the Program Director at least one hour prior to the designated start time to report an absence. Habitual or excessive absences may result in a grade of Incomplete for the clinical section rotation and progressive disciplinary action. **Text messages are not acceptable notification, there must be an email with the message.** If a text message is received, the time will be counted as unexcused.

Personal Time off (PTO):

- 16 hours of PTO will be allowed each academic session for illness, emergent or personal situations.
- If more than 16 hours are used in a semester, each additional hour will count against the Professionalism grade.

Excused Absences:

- Illness
 - Taking time off for an illness WILL count against the PTO allotment.
 - If the student will be out for more than 2 days in lecture or clinical experience (using greater than 16 hours PTO) due to illness, a doctor's note will be required to be submitted upon the student's return. This will still count against the PTO allotment.
 - If a student comes in when sick (fever, cough, etc.) and is sent home, they will forfeit the PTO for the day. Cleveland Clinic and the Phlebotomy program strongly suggest that employees and/or students do not come into their facilities while sick to prevent the spread of illness to patients or other caregivers.
- Early dismissal/day off approved by Program Director or LES – will NOT count against the PTO allotment.
- HR appointments
 - Time off for Cleveland Clinic-related pre-employment appointments and orientation are NOT counted towards the student's PTO allotment, but must be approved by Program Director in advance.
 - Time off for non-Cleveland Clinic employment issues is counted against the PTO allotment.
- Attendance at a professional (PBT) meeting will not count against the PTO allotment. Students must obtain prior approval and bring in evidence of attending the entire meeting or it will be counted against the PTO allotment.
- Bereavement leave
 - Student may take up to three days for the death of an immediate family member as defined below.
 - Spouse, child/stepchild, mother/stepmother, father/stepfather, mother-in-law, father-in-law, sister, brother, grandmother, grandfather
 - Student is responsible for completing any work missed during their absence.
 - This time will not be counted against the student's PTO allotment.
- Jury duty
 - This time will not be counted against the student's PTO allotment.

- Student is responsible for completing any work missed during their absence.
- Student must bring in evidence of jury duty attendance or it will be counted against the PTO allotment.
- This may require the student to be placed in the next cohort if a significant amount of time has been missed and cannot easily be made up.
- Military duty
 - This time will not be counted against the student's PTO allotment.
 - Student is responsible for completing any work missed during their absence. If leave is for an extended length of time, Program Director has the right to move student to the next available cohort to complete program requirements.
 - Student must bring in evidence of participation in military duties during regular program hours or it will be counted against the PTO allotment.
 - This may require the student to be placed in the next cohort if a significant amount of time has been missed and cannot easily be made up.
- Weather emergencies
 - If Cleveland Clinic declares a weather emergency, students will not be charged with a tardy if they are late. If students do not come in at all, the time will be considered unexcused. The Program Director may deviate from this rule on a case-by-case basis.

Unexcused Absences:

- Any absence not listed above
- Failure to comply with the one-hour call in/email requirement
- Any unexcused PTO will be counted against the students' Professionalism grade.

Each occurrence of unexcused absence will result in progressive disciplinary action leading up to program dismissal.

- Tardy – arriving after set class time. If a student arrives more than 8 minutes late, they will be penalized with a tardy AND will have to use their PTO for the balance of missed time.
- Leave Early -- leaving more than 15 minutes prior to the scheduled end time.

LEAVE OF ABSENCE

The purpose of this policy is to provide guidelines on the request of a leave of absence and the return of a student from a leave of absence.

Requests for leave of absence:

- Eligible students must be in good academic standing (see Student Academic Performance Standards) to request a leave of absence.
- Any requests for a leave of absence must include a projected return date prior to beginning the leave.
- All requests must be in writing and submitted to the Program Director as soon as the start of the leave is reasonably known.

Requirements during a leave of absence:

- Students are responsible for the completion of all work during their absence and all courses and/or rotations must be completed to the satisfaction of the Program Director.
- Criteria for completion will be provided to the student in writing.

Return from leave of absence:

- Students who request a temporary leave will start with the new cohort.
 - Students that accept the open position in the next cohort are automatically placed in the class, without new tuition fees if already paid, interviews or other requirements expected of a standard applicant.
 - Students that do not accept the open position in the next cohort will be allowed to re-apply to the program at a later date, but are not guaranteed placement in the program, and will need to repay tuition.

SPARE TIME

Students should not expect to be scheduled additional study time during the clinical experience part of each semester. If the laboratory work is slow or the instructor is busy and unable to work with the student, the student is expected to use this time for studying. There are several areas where this may be done:

- A designated area in the laboratory as identified by the LES/Program Director
- Huddle rooms or conference room

The LES/Program Director, or preceptor must be aware of the student's study location at all times so they can be located when needed.

Spare time is not to be used for sleeping, watching videos, viewing non-laboratory related websites, going to the on-site gym or any other non-laboratory related activities. Students that are caught doing non-laboratory related activities during working hours will be given one verbal warning to discontinue that activity. Subsequent findings of inappropriate behavior will result in progressive disciplinary action.

EXAMS

Exams begin promptly at the start of the scheduled exam day. A student arriving late for an exam will be permitted to take the exam as long as the allotted time for that exam does not extend beyond 15 mins of exam start time. If there is not enough time for completion by, an alternate time fitting into the Program Director's schedule may be arranged.

If the student is absent (excused or unexcused) when an exam is given, it is the student's responsibility to coordinate an alternate date for the exam with the Program Director. That exam must be taken within 2 working days of the original exam. Exceptions may be made only at the Program Director's discretion.

If a student missed the exam without an excuse, a reduction of 10% will automatically be assessed. Each subsequent missed exam will result in an additional 10% penalty.

Nothing is allowed in the exam room except for a pen/pencil. Students are not allowed to bring in books, notebooks, binders, bookbags, cell phones, tablets, headphones, calculators, food or drinks. This is to mimic the environment at the testing center for the ASCP BOC exam.

Students are expected to report to assigned study areas when they have completed the exam.

SCHOOL LIBRARY

Reference materials are located in the Administrative Offices (Program Director Office).

- School textbooks and study materials are not taken into laboratory work areas to prevent contamination.
- They may be used in libraries or conference rooms but are not to be left in these areas.
- Reference books may be borrowed overnight or for the weekend.
- Program materials and texts used for weekly exams are to be returned on the day of the exam o
- Books should not be written in or marked in any way as they are used by all students.

STUDENT SUPERVISION

Students are supervised in a manner to ensure that student to faculty ratios do not exceed acceptable and safe limits.

POLICY

When students are scheduled in the student lab portion of the clinical rotation, there will not be a greater than 8:1 student to teacher ratio. This is due to space limitations and optimal teaching experience.

When students are scheduled in the clinical labs for that portion of the clinical rotation, there will not be a greater than 2:1 student to teacher ratio. This is to ensure optimal patient care, lessen impact on the clinical laboratories and enhance the student experience.

If there is a time when the above ratios may be exceeded in the clinical lab, the program director will step in and take over the educational experience and/or call for additional faculty members to assist.

STUDENT ACADEMIC PERFORMANCE STANDARDS

Good academic standing must be achieved in order to complete the program and be permitted to sit for national certification examinations. Criteria for acceptable performance are determined by the student's performance throughout the entire program.

ACADEMIC COUNSELING

Academic counseling is available to any student upon request. The Program Director is available to confidentially discuss academic progress, learning challenges, grades, or any other academic concerns. Contact the Program Director to make an appointment.

It is the responsibility of the student to:

- Track their academic progress.
- Maintain awareness of their disciplinary status and to meet with the Program Director to ensure understanding of the policy.
- Request additional help or tutoring from the Program Director if needed.

ACADEMIC STANDARDS

Definitions:

- Course: An individual subject that is taught for a length of time for which a student receives a final grade upon completion.
- Academic Watch: An academic probationary step that a student receives when their grade in a section falls below a certain threshold.
- Academic Probation: An academic probationary step that a student receives when their final grade in a section falls below a certain threshold.

Each week of the program during the didactic section of each course, exams or quizzes are given. Course grades are determined by an average of the exam/quiz grades and lab grades.

- If a student scores below a 70% on any exam (written or practical), the exam is considered unsatisfactory.
- Students are required to complete all exams in every course. No extra credit will be given to increase the overall exam grade.
- A student is placed on Academic Watch when the overall (lab and lecture) score in a course section drops below 75%. This grade will be calculated by averaging the final grades from each course in the section. The Academic Watch step is removed at the end of the section, as long as the student is in good academic standing i.e. final scores (lab and lecture) in the section are an average $\geq 80\%$. (End of section as defined by didactic end dates)
- A student is placed on Academic Probation when the overall score at the end of a section (End of section as defined by didactic end dates) is below 70%. This grade will be calculated by averaging the final grades from each course in the section. The Academic Probation step is removed if the student returns to good academic standing, i.e. attains a final score of $\geq 75\%$, for the next section.
- A student with a final section grade of $\geq 70\%$ - $<75\%$ will remain in Academic Watch until they achieve acceptable final grades ($>75\%$) in the next section.
- If the student scores $\leq 70\%$ in two consecutive or concurrent sections (as defined by didactic end dates), the student will be dismissed from the program. This grade will be calculated by averaging the final grades from each section. This grade calculation step will only occur when a student is in

jeopardy of Academic Watch, Academic Probation or program dismissal. Program dismissal guidelines can be found in the student handbook in the “Dismissal from the Program” section

- Students will be notified in writing at the midpoint of the section if they have been put on Academic Watch or Academic Probation. Students are required to sign the notice in acknowledgement. When the student has been removed from Academic Watch or Academic Probation, they will be again notified in writing and acknowledge with a signature. This documentation is kept in their permanent student file.
- It is the responsibility of the Lab Education Coordinator/Program Director to determine the academic standing of each student and communicate this to the Program Director after the exam scores are finalized every other week by the end of the first business day after the exam.
- The student will get the opportunity to evaluate the faculty members at the end of the cohort. These surveys are shared with the faculty member after the course grades are finalized to identify opportunities for improving the section. The survey results are also used in the Annual Performance Reviews for the faculty members.

Grading Scale for Academic Examinations and Laboratory Performance		
% Score	Letter Grade	Interpretation
90-100	A	Excellent
80-89	B	Above Average
70-79	C	Average
<70	F	Failure

STUDENT BEHAVIORAL GUIDELINES

Students are expected to adhere to all policies of both Cleveland Clinic and the Robert J. Tomsich Pathology and Laboratory Medicine Institute.

STUDENT CONDUCT

Ethical conduct, especially honesty, is essential in the profession of Phlebotomy. Any incident of personal misconduct could result in dismissal from the program.

Examples of prohibited conduct are listed below. This list is not exhaustive and it should not be inferred that unlisted activities are permissible.

- Cheating in any form on any quiz, examination, or written assignment
- Plagiarism
- Falsification of information

- Violation of the Cleveland Clinic policy on substance abuse
- Violation of HIPAA requirements as related to the confidentiality of protected health information (PHI)
- Legal infraction that would prevent a student from obtaining employment at a Cleveland Clinic facility
- Violation of the Cleveland Clinic policy on weapon control
- Insubordination
- Inappropriate use of spare time during working hours
- Inappropriate conduct during working hours
- Use of cell phones in the laboratory. This includes smartphones, smart watches, tablets or other electronic devices.
- Repeated unprofessional or unsafe behavior during academic hours on the Cleveland Clinic properties

ACADEMIC INTEGRITY

Students are expected to adhere to the standards of academic integrity. Academic dishonesty is against the program as well as the Institute and Clinic standards. Academic dishonesty standards include, but are not limited to, the following:

Plagiarism: defined as submitting the language, ideas, thoughts or work of another as one's own; or assisting in the act of plagiarism by allowing one's work to be used in this fashion.

Cheating: defined as obtaining or providing unauthorized information during an examination through verbal, visual or unauthorized use of books, notes, text and other materials; obtaining or providing information concerning all or part of an examination prior to that examination; taking an examination for another student, or arranging for another person to take an exam in one's place; altering or changing test answers exam completion, or falsifying academic records.

Discipline for violations of course academic standards may include any of the following: Reduction in the overall score by 2 letter grades, requiring the assignment to be repeated for a one letter grade reduction, or removal from the program entirely. Disciplinary actions are at the discretion of the Program Director.

PROFESSIONAL ETHICAL BEHAVIOR GUIDELINES

Barbara M. Castleberry, PhD, MT(ASCP) and Steven D. Wright, MT(ASCP) developed the original ASCP BOC ethical behavior guidelines for certificant. The current guidelines, approved by the BOC Board of Governors in April, 2012, are as follows:

Recognizing that my integrity and that of my profession must be pledged to the best possible care of patients based on the responsibility of my work, I will:

- Treat patients with respect, care and thoughtfulness.
- Develop cooperative and respectful relationships with colleagues to ensure a high standard of patient care.
- Perform my duties in an accurate, precise, timely, and responsible manner.
- Safeguard patient information and test results as confidential, except as required by law.
- Advocate the delivery of quality laboratory services in a cost-effective manner.
- Comply with laws and regulations and strive to disclose illegal or improper behavior to the appropriate authorities.
- Continue to study, apply, and advance medical laboratory knowledge and skills; and share such with other members of the healthcare community and the public.
- Render quality services and care regardless of patients' age, gender, race, religion, national origin, disability, marital status, sexual orientation, or political, social, or economic status.

DISMISSAL FROM THE PROGRAM

ACADEMIC DISMISSAL

All students enrolled in the School of Phlebotomy are expected to remain in good academic standing throughout the clinical year. The disciplinary procedure for academic dismissal is as follows: Placement on Academic Watch (Step One) or Academic Probation (Step Two) is considered to be the warnings that could lead to program dismissal. If a student scores ≤ 70 in two consecutive or concurrent sections, the student will be dismissed from the program.

BEHAVIORAL DISMISSAL

Students are also expected to adhere to all policies of both Cleveland Clinic and the Robert J. Tomsich Pathology and Laboratory Medicine Institute. The first instance of policy infraction with regard to inappropriate behavior will result in a Verbal Warning and documentation of the incident. The student will be scheduled to meet with the Program Director to discuss the policy breach. All subsequent infractions will require a meeting with the Program Director to review the infraction and sign the disciplinary forms.

If any additional policy breach occurs, the student will be placed in disciplinary action as follows:

First infraction	Step 1	=	Verbal warning
Second infraction	Step 2	=	First written warning
Third infraction	Step 3	=	Second written warning
Fourth infraction	Step 4	=	Resignation/Dismissal

Once a student reaches Step 4 of the disciplinary action process, the student will be given the option of resignation or dismissal from the Program.

The dismissed student is responsible for returning any borrowed reference materials belonging to the School. The student must surrender their temporary ID badge and prior to departure on the last day. There will be no reimbursement for any expenses incurred as a result of being in the Program.

STUDENT APPEAL PROCESS FOR CLEVELAND CLINIC IN-HOUSE TRAINING PROGRAM

PURPOSE

The Appeal Mechanism provides a thorough, timely and objective assessment and resolution of student concerns and assures that students are treated in a fair, reasonable and nondiscriminatory manner. An appeal can be any concern or complaint asserted by a student regarding interpretation, application or breach of any policy, practice or procedure.

ELIGIBILITY

This procedure is available to any student enrolled in a Cleveland Clinic enterprise in-house health science education program, who does not have any affiliation with a college/university.

PROCEDURE

The Cleveland Clinic desires to resolve student grievances, complaints and concerns in an, expeditious, fair, cordial and professional manner. A student may resolve a grievance by initiating the following steps:

INFORMAL PROCESS

The student is advised to discuss the grievance informally with the person who is the source of the grievance. If the parties resolve the grievance, it is deemed closed. If the grievance is not resolved at this level, the student may request an informal review by the Program Director. It is expected that most problems or complaints of concern to students will be discussed and resolved in a timely fashion informally between the student and the Program Director. If the response from the Program Director is unacceptable to the student or if the Program Director is the basis of the complaint, the student may initiate the formal grievance procedure. The Director of Health Sciences Education will be notified immediately by the Program Director of an impending formal grievance.

FORMAL GRIEVANCE PROCEDURE

The formal grievance procedure begins when a dated written complaint is submitted to the program director. The written complaint may be submitted via email. An appeal must be initiated within 5 business days of the date on which cause of the appeal is known. A copy of the appeal must be sent to the Center for Health Sciences Education.

1. The first step of appeal should involve discussion with the Program's Medical Director. Every effort should be made to resolve the issue at this step of the process. The Program's Medical Director has five business days to respond to the student in writing following the initial appeal request by the student as to the decision rendered.
2. If the decision rendered at the first step is deemed unacceptable by the student, the second step of appeal should involve the Director of Health Sciences Education. The Director of Health Sciences Education has 5 business days to respond to the student in writing following notification of appeal as to the decision rendered.
3. If the decision rendered at the second step is deemed unacceptable by the student, the third step of the appeal involves the Health Professions' Education Council's Student Appeals Committee. The committee chairperson and one committee member will review each appeal. The decision and recommendations at this step are final. The Health Professions' Education Council has 10 business days to respond to the student in writing following notification of appeal as to the decision rendered.
4. An appeal should be filed with the Center for Health Sciences Education Office. The education office will assign someone to assist the student throughout the appeal process.
5. The student shall have the opportunity to appear in person before the reviewing party at each step of the appeal process.
6. Appeals at each step must be made in writing by the student within 10 business days after receipt of the reviewing party's response. Email is acceptable. The Center for Health Sciences Education must be copied on all communications at each step of the appeals procedure.
7. The Human Resources and Legal Departments are available, in a consultative capacity, to the Program Director, Program's Medical Director, Director of Health Sciences Education or to the Chairman, Education Institute as it relates to the student's appeal.

WITHDRAWAL FROM THE PROGRAM

A student may withdraw from the School of Phlebotomy at any time. The reason for the withdrawal is not required. Once the letter of intent is received by the School, the Program Director will set up a meeting with the student to discuss the withdrawal.

The withdrawing student is responsible for returning any borrowed reference materials belonging to the School. The student must surrender their temporary ID badge prior to departure on the last day. There will be no reimbursement for any expenses incurred as a result of being in the Program. Tuition will be reimbursed following the disbursement schedule if a refund is due.

The student will be asked to complete a final program evaluation prior to departure.

Students withdrawing from the program prior to week six of the academic session will be considered withdrawn. Students withdrawing after week six of the academic session will be counted as incomplete and will be included in the published outcomes measures according to NAACLS Standards.

PROGRAM EVALUATION

An annual review of the School of Phlebotomy will be conducted to determine if the program is meeting its objectives. Two of the primary objectives of the school are to educate and train students to perform venipuncture and capillary puncture while maintaining quality assurance during specimen collection and to utilize critical thinking to apply knowledge of disease states and conditions in relation to specimen collection for clinical lab testing. Additional objectives address communication, infection control, ethics, and laboratory and professional development. Measures of program effectiveness may include graduation rates, employment rates, scores on the ASCP Certification Examination, scores on the Comprehensive Examination, and surveys of graduates and employers. Data derived from these measures will be used to assess program effectiveness.

Each measure will be used to assess one or more program objectives. The data will be compiled by the Program Director and reviewed by the Advisory Board twice each year. When data from previous years are available, trending analysis will be conducted. Upon advice of the Board, changes may be made to program content to better meet stated objectives. The impact of any changes made to the program will be evaluated annually using the measures defined within the plan.

STUDENT RECORDS AND RETENTION

RETENTION

- All student files are retained in a secure location.
- Current students' files are maintained in the Program Director's office.
- Past student files are kept indefinitely in a secure storage location within a locked file cabinet.

DISCLOSURE

- Current students have the right to review their file at any time.
- The student must submit requests for transcripts or other disclosures in writing to the Program Director.
- Disclosures will only be made to the parties authorized by the student.
- A record of the written request for disclosure is retained in the student's file.

RETENTION SCHEDULE

Schedule of record retention is maintained in the Phlebotomy Manual of Operations.

FERPA (BUCKLEY AMENDMENT)

The Family Education Rights and Privacy Act of 1974 (FERPA) is a federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program

of the U.S. Department of Education. The Cleveland Clinic Phlebotomy program strictly follows these guidelines.

FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are "eligible students."

- Parents or eligible students have the right to inspect and review the student's education records maintained by the school. Schools are not required to provide copies of records unless, for reasons such as great distance, it is impossible for parents or eligible students to review the records. Schools may charge a fee for copies.
- Parents or eligible students have the right to request that a school correct records which they believe to be inaccurate or misleading. If the school decides not to amend the record, the parent or eligible student then has the right to a formal hearing. After the hearing, if the school still decides not to amend the record, the parent or eligible student has the right to place a statement with the record setting forth his or her view about the contested information.
- Generally, schools must have written permission from the parent or eligible student in order to release any information from a student's education record. However, FERPA allows schools to disclose those records, without consent, to the following parties or under the following conditions (34 CFR § 99.31):
 - School officials with legitimate educational interest;
 - Other schools to which a student is transferring;
 - Specified officials for audit or evaluation purposes;
 - Appropriate parties in connection with financial aid to a student;
 - Organizations conducting certain studies for or on behalf of the school;
 - Accrediting organizations;
 - To comply with a judicial order or lawfully issued subpoena;
 - Appropriate officials in cases of health and safety emergencies; and
 - State and local authorities, within a juvenile justice system, pursuant to specific State law.

Schools may disclose, without consent, "directory" information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, schools must tell parents and eligible students about directory information and allow parents and eligible students a reasonable amount of time to request that the school not disclose directory information about them. Schools must notify parents and eligible students annually of their rights under FERPA. The actual means of notification (special letter, student handbook, or newspaper article) is left to the discretion of each school.

For additional information, you may call 1-800-USA-LEARN (1-800-872-5327) (voice). Individuals who use TDD may use the Federal Relay Service.

Or you may contact them at the following address:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW

CHANGE IN CONTACT INFORMATION

Any change to information provided at the onset of the program (e.g. address, phone number, email address) should be communicated to the Program Director as soon as possible. It is the student's responsibility to ensure all information is up to date.

STUDENT HEALTH AND WELLNESS SERVICES

Student health services are available to the student at the student's expense. Each student is permitted access to the Emergency Department located on the first floor of the E building in case of medical need.

Any student involved in an exposure incident (a specific eye, mouth, or other mucous membrane; non-intact skin; or parenteral contact with blood or other potentially infectious material) will follow the Occupational Exposures to Blood and Body Substances policy as outlined in this handbook. All incidents must be reported to the Program Director immediately following the incident to assist the student with proper follow-up protocols.

STUDENT MENTAL HEALTH SERVICES

Students enrolled in Cleveland Clinic internal health science programs are eligible for no cost, confidential services. To access more information, please call 216-445-6970 or 1-800-989-8820, or use the website link below:

<http://portals.ccf.org/caregivers/CaringforCaregiversHome/tabid/3037/Default.aspx>

CONFIDENTIAL INFORMATION

POLICY

During the course of the program, students may have access to confidential information concerning patients, employees or other students. This information may be in the form of verbal, written, and/or computerized data.

The protection of this confidential information is a critical responsibility of each student. As such, the unauthorized acquisition, release, and/or discussion of any information related to CCF business, patient medical information, current and past employees, current and past students, job applicants and computerized data is considered a major infraction, subject to disciplinary action up to and including program dismissal.

POLICY IMPLEMENTATION

PROTECTED HEALTH INFORMATION

Under the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA), Protected Health Information (PHI) is any information that is created, received, and maintained by CCF related to an individual's health care (or payment related to health care) that directly or indirectly identifies the individual. Use of PHI refers to the sharing, applying, or analyzing of PHI within CCF. "Disclosure" refers to the release of PHI outside CCF.

The use and disclosure of PHI by students shall occur only in accordance with HIPAA Privacy Policies. PHI may be accessed only by those individuals who, within the scope of their job responsibilities, have a legitimate need for such information for purposes of patient care, research, education, or administrative uses. Any other use or disclosure of PHI may be considered a major infraction of CCF policy, and may also be subject to criminal penalties.

Further, the taking of photographs or any other electronic or recorded images, videotaping, audiotaping, electronic or data recording by any mechanisms including but not limited to cameras, video cameras, movie cameras, cell phones or cell phone cameras or any recording device without the express written consent of the individual is strictly prohibited.

EMAIL USAGE

PURPOSE

To provide clear expectations to students regarding the access and disclosure of email system messages created, sent or received by students or employees using Cleveland Clinic's email systems.

POLICY STATEMENT

Cleveland Clinic will maintain email systems. These systems are provided by Cleveland Clinic to assist in the conduct of business within the organization. The email hardware is Cleveland Clinic property. Additionally, all messages composed, sent or received on the systems are and remain the property of Cleveland Clinic. They are not the private property of any student, nor should students have any expectation of privacy with regard to such messages. Time spent using the email systems must not interfere with or affect program activities.

POLICY IMPLEMENTATION

The email systems may not be used to solicit for commercial ventures, religious or political causes, outside organizations or other non-job related solicitations. The email systems are not to be used to create any offensive or disruptive messages. Among those which are considered offensive are any messages which contain sexual implications, racial slurs, gender-specific comments or any other comment that offensively addresses someone's age, race, sex, or sexual orientation, religious or political beliefs, national origin or disability.

To the fullest extent permitted by law, Cleveland Clinic reserves and intends to exercise the right to review, audit, intercept, access and disclose all messages created, received or sent over the email system for any purpose. The contents of electronic email properly obtained for legitimate business purposes may be disclosed within Cleveland Clinic without the permission of the student.

Notwithstanding Cleveland Clinic's right to retrieve any email messages, such messages should be treated as confidential by students and accessed only by the intended recipient. Students are not authorized to retrieve any email messages that are not sent to them.

Students shall not use a code, access a file, or retrieve any stored information unless authorized to do so. Students should not attempt to gain access to another student's messages without the latter's permission. Passcodes for any Cleveland Clinic owned or managed devices must be provided to the Program Director upon request.

Any student who violates this policy or uses the email system for improper purposes shall be subject to corrective action, up to and including program dismissal.

IDENTIFICATION BADGES

PURPOSE

Identification (ID) badges are issued to provide students with a means of identification, to promote safety and security on Cleveland Clinic property, to be used for access controls, parking, timekeeping, and to assist in emergency identification as necessary. The ID badges assure Cleveland Clinic patients, visitors, and coworkers have the ability to identify students.

POLICY STATEMENT

It is the policy of Cleveland Clinic to provide every individual who requires regular, unescorted, access to the interior of Cleveland Clinic facilities with an ID badge. Such badges must be worn above the waist at all times while the student is on property owned or leased by Cleveland Clinic. All ID badge holders are required to provide their identification badge to management and/or Protective Services, including the Cleveland Clinic Police Department, upon request. Failure to properly display, or present, a valid Cleveland Clinic ID badge can result in the revocation of the badge and/or other appropriate disciplinary action.

Temporary employees, medical students, healthcare students, and visiting physicians as well as consultants and contractors must obtain a temporary ID badge during their Cleveland Clinic assignment. Cleveland Clinic uses colors to distinguish between the employee and non-employee populations:

White badges - all Cleveland Clinic employees and privileged positions

Blue badges - non-employees

Green badges – volunteers, non-employee

Pink badges - authorized nursing staff clinically trained to provide care to infants

An ID badge shall not be used by anyone other than the individual to whom it was issued. Furthermore, an ID badge will not be issued until an appropriate background check, including government debarment checks and criminal record checks, have been initiated and/or completed on the individual. Such background checks shall be completed by Protective Services consistent with applicable policies and procedures.

A Cleveland Clinic ID badge will not be displayed or worn in any forum that would lead a reasonable observer to believe the activity is Cleveland Clinic sponsored and/or approved and that the individual is representing the organization in an official capacity. The badge may be only worn for its issued, specific purpose within the individual's scope of work performed at Cleveland Clinic.

LOCKERS AND LOCKS

POLICY

TBD

LOCKER ASSIGNMENT PROCEDURE

TBD

INTERNAL DISASTER PROCEDURE

POLICY

It may be necessary to evacuate an area of the Cleveland Clinic because of the occurrence of one or more of the following possible events. If any of these events occur and evacuation becomes necessary, then the order to evacuate might originate with any of the persons listed below:

EVENT	PERSON ORDERING EVACUATION
Fire, Smoke, or Fumes	Area City Fire Department CCF Fire Marshall CCF Administration CCF Security Department
Bomb Threat	Area City Police Department CCF Security Department CCF Administration
Explosion, Tornado, Power Failure, or Flooding	CCF Security Department CCF Facilities Management CCF Administration

If evacuation is necessary and the student cannot move horizontally into another area, the department should then use the nearest preferred stairway and if not available, then use the alternative stairway that the department has determined for such evacuation emergencies.

The Program Director is responsible for the students' awareness of the above procedure and must see that the students have reviewed their fire plan and walked each stairway to an exit at least once every three months.

Copies of these instructions are available through the Safety Office or online through the CCF Intranet, Safety Handbook.

NON-SMOKING

PURPOSE

To promote the safety, health, and wellness of our organization, enhance the quality of life for each other and those we serve, support state and local ordinances, and meet The Joint Commission standards.

POLICY STATEMENT

- Cleveland Clinic is committed to providing a safe and healthful environment for all students, employees, visitors and patients. Therefore, smoking, using any smoke-producing products (including but not limited to cigarettes, e-cigarettes, cigars, pipes and vaporizers), or the usage of any tobacco products is prohibited on all Cleveland Clinic owned and leased properties and private property adjacent to the facilities.
- No tobacco products will be sold on Cleveland Clinic properties.
- Students who violate this policy will be subject to disciplinary action.

BLOODBORNE PATHOGEN EXPOSURES

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

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.

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).

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.

Student – Includes all students at Cleveland Clinic facilities participating in education programs approved by Cleveland Clinic.

INSTRUCTIONS

A student must notify the Program Director of the bloodborne pathogen exposure to comply with this policy. 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 student 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 student will be advised to seek an immediate evaluation for HIV prophylaxis and will be referred to the Emergency Department (ED).
- 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

Students are expected to have health insurance. Students 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 program dismissal.

PREVENTION OF WORKPLACE VIOLENCE

PURPOSE

To provide Cleveland Clinic students with clear expectations regarding the identification, management and reporting of violent, threatening, harassing or intimidating behavior from patients, employees, contractors, vendors, visitors or other students.

POLICY STATEMENT

Cleveland Clinic is committed to maintaining a safe and productive work environment for its employees and students and to protecting the safety and well-being of its patients, their families and visitors. Violent, threatening, harassing or intimidating behavior, when exhibited by students, employees, patients, contractors, vendors or visitors is not permitted, and will not be tolerated. Instances of such behavior will be investigated promptly and appropriate action will be taken. Cleveland Clinic strives to be a blame-free environment in which reporting of all workplace violence incidents are strongly encouraged. No student will suffer retaliation for making a good faith report of an incident of violence in the workplace. Cleveland Clinic provides workplace violence prevention education available for all employees and follow up care and support for those that have been the victim of workplace violence.

DEFINITION

Workplace violence: Any act or threat of physical violence, harassment, intimidation, or other threatening disruptive behavior that occurs at the work site. It ranges from threats and verbal abuse to physical assaults and even homicide. It can affect and involve employees, students, patients, contractors, vendors and visitors.

PROCEDURE

Cleveland Clinic has adopted the following guidelines to deal with intimidation, harassment and other threats or acts of actual violence that may occur at Cleveland Clinic facilities or off-site during work related activities:

- ACTS OF VIOLENCE OR IMMINENT THREATS OF VIOLENCE SHALL BE REPORTED BY THE AFFECTED STUDENT, EMPLOYEE OR PROGRAM DIRECTOR. **Call Cleveland Clinic Police at: (216) 444-2222**
- Students who believe that they are being subjected to threats, threats of violence, harassment and/or intimidation while on Cleveland Clinic premises or while conducting Cleveland Clinic business shall report the situation to the Program Director as soon as possible. Students are encouraged to bring any disputes with other students or employees to the attention of the Program Director before the situation escalates. When making a report of threatened or actual violence, students are encouraged to provide as many details as possible to assist in the investigation of the complaint. Cleveland Clinic will not retaliate against students making good faith reports of threatened or actual acts of violence or suspicious individuals or activities.
- Cleveland Clinic will conduct a prompt and thorough investigation into all reports of violence and threatened violence. All activities related to such a complaint will be held in confidence to the fullest extent possible and the investigation will be conducted in a manner designed to protect the privacy of all concerned. However, due to the need to investigate complaints thoroughly, strict confidence cannot be guaranteed.
 - Following the investigation, the Program Director will determine the action(s) to be taken including, but not limited to, disciplinary action up to and including program dismissal.
 - If an investigation results in a finding that a complainant falsely and maliciously accused another individual of threatening, harassing, intimidating and/or violent behavior, the complainant will be subject to disciplinary action up to and including program dismissal.

DOMESTIC VIOLENCE

- Students who have obtained Emergency Protective Orders (restraining orders issued by a Court of Common Pleas or other court of competent jurisdiction) on another person are strongly encouraged to notify their Program Director and Cleveland Clinic Police of the situation. This information is for the protection of employees and students.

- When the possibility exists that an student's domestic situation could pose a danger to the student or others in the workplace, the Cleveland Clinic Police Department will work cooperatively with the student and Program Director to develop a plan to protect the students, employees, patients and visitors from violence or the threat of violence.

ANTI-HAZING POLICY

PURPOSE

The purpose of this policy is to prohibit student hazing and to provide for penalties in compliance with applicable state law.

POLICY STATEMENT

Cleveland Clinic is committed to maintaining a safe, healthy 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 hazing as defined in this policy.

DEFINITION

Cleveland Clinic United States locations: Includes the main campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, South Pointe, Children's Hospital for Rehabilitation, Cleveland Clinic Florida, Cleveland Clinic Hospital (Weston), Coral Springs Ambulatory Surgery Center, 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.

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.

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.

Hazing: Doing any act or coercing another, including the victim, to do any act of initiation into any student or other organization or any act to continue or reinstate membership in or affiliation with any student or other organization that causes or creates a substantial risk of causing mental or physical harm to any person, including coercing another to consume alcohol or a drug of abuse.

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.

PROCEDURE

Scope

This policy applies to students as that term is defined in this policy. This policy applies to conduct that takes place on or off Cleveland Clinic premises and that involves two or more people who are affiliated with the Educational Program or Activity. Hazing directed toward or by individuals other than students falls under the Professional Conduct Policy.

Procedure

Individuals who become aware of any student engaged in hazing shall report the conduct to the student’s program leadership. The student’s program leadership shall investigate the report, as appropriate, in accordance with the disciplinary process for the program. Where the hazing conduct may constitute a crime, program leadership shall report it to the appropriate law enforcement agency.

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

SOCIAL MEDIA USE

PURPOSE

To provide all students with rules and guidelines for participation in social media (also known as social networking).

POLICY STATEMENT

The intent of this Policy is not to restrict the flow of useful and appropriate information, but to safeguard the interests of Cleveland Clinic, its employees, students and its patients.

Although Cleveland Clinic recognizes the value of social media as a tool for communicating and gathering information, time spent posting on or viewing social media sites must not interfere with the activities required by the Phlebotomy program.

DEFINITIONS

Content: Student, business, patient, or financial information, healthcare practices or protocols, or any other information that is transmitted or maintained in any form medium including text , images, video , and audio formats (see Confidentiality and Patient Information Policy).

Social Media (Social Networking): Social media and social networking include but are not limited to the following:

- Cleveland Clinic internal intranet sites and blogs;
- Cleveland Clinic publicly facing internet web sites;
- social networking sites , such as Facebook®, Instagram® or LinkedIn®;
- blogs (including corporate or personal blogs and comments to blogs) and other on-line journals and diaries;
- forums and chat rooms, such as discussion boards, Yahoo! Groups®, or Google® Groups ;
- microblogging, such as Twitter®;
- online encyclopedias , such as Wikipedia®; and
- video or image based sites such as Flickr®, YouTube® and similar media.

In addition to posting on websites like those mentioned above, social media and social networking also include permitting or not removing postings by others where a student can control the content of postings, such as on a personal profile or blog.

POLICY IMPLEMENTATION

When communicating on Cleveland Clinic social media sites, or communicating about Cleveland Clinic or as a representative of Cleveland Clinic on any social media site unaffiliated with Cleveland Clinic , students are expected to follow the same standards and policies that otherwise apply to them as a

student. For example, social media activity is subject to Cleveland Clinic policies that strictly prohibit discrimination, harassment, threats, and intimidation. The guidelines set forth in Cleveland Clinic's HIPAA and Confidential Information policies also apply to social media activity such as comments posted to Facebook , blogs, or discussion forums, as do the guidelines set forth in Cleveland Clinic's Telephone and Cellular Phone Use policy.

Students must not post content about students, employees, faculty or the Program Director, or the Cleveland Clinic that is knowingly false, vulgar, obscene, threatening, intimidating, harassing, defamatory, or detrimental to the Cleveland Clinic's legitimate business interests. Students must not post content that violates Cleveland Clinic's workplace policies against discrimination, harassment, or hostility on account of race, color, religion, gender, sexual orientation, gender identity, gender expression, pregnancy, marital status, age, national origin, disability, military status, citizenship, genetic information or any other protected class, status, or characteristic protected by state, federal or local law. Inappropriate postings may include, for example, discriminatory remarks; harassment on the basis of race, sex, disability, religion and other protected characteristics; malicious posts meant to intentionally harm someone's reputation; posts that could contribute to a hostile work environment or violate the Professional Conduct Policy; and threats of violence or other similar inappropriate and unlawful conduct. Students should use good judgment and discretion in developing postings.

STANDARDS

STUDENT MONITORING

Students should have no expectation of privacy with respect to any communication sent through Cleveland Clinic's computer system or networks. Also, students should have no expectation of privacy when using social media during work time or in regard to anything posted that is accessible by the general public.

Social media activity using the Cleveland Clinic's electronic resources is subject to all Cleveland Clinic policies, including the Acceptable Use Policy. Cleveland Clinic will, in its discretion, review and restrict social media activity to the fullest extent permitted by applicable law.

RULES FOR SOCIAL MEDIA AND SOCIAL NETWORKING

In the interest of guarding the privacy of our patients, students must not publish any content- including photos, names, likenesses, descriptions or any identifiable attributes or information - related to any Cleveland Clinic patient on any form of social media or to any third party. Postings that attempt to describe any specific patient and/or patient care situation, or that contain any patient identifier, or in combination with other information may result in identification of a particular patient directly or indirectly, are inappropriate and strictly prohibited.

Time spent posting or viewing any social media sites, including Cleveland Clinic social media sites, must not interfere with or affect educational responsibilities.

For the purpose of respecting all copyright and intellectual property laws, and Cleveland Clinic's interest in the use of its brand, students must not use Cleveland Clinic's name, logo, trademark, or proprietary

graphics in a way that suggests that the student is representing Cleveland Clinic without receiving permission. Students also must not use Cleveland Clinic's logo, trademark, or proprietary graphics in any commercial activity. Nor shall students use the Cleveland Clinic logo, trademark, or propriety graphics while engaging in conduct that violates Cleveland Clinic policy

Students must not use their enterprise e-mail address to register for any personal social media account or site, or as an identifier needed to participate in any personal social media activity.

Students should not post photos of other Cleveland Clinic students on social media sites without the other student's permission.

Students must not post content on any social media site that is related to confidential or proprietary information of Cleveland Clinic, its patients, or vendors, such as health information or trade secrets. Trade secrets may include information regarding the development of systems, processes, procedures or other internal business-related confidential communications.

Students must not use Cleveland Clinic-sponsored sites to solicit for or promote personal businesses or other organizations, including but not limited to outside business ventures, charities, political campaigns, or religious groups. For example, students must not use Cleveland Clinic-sponsored sites to promote a personal cosmetics business or a political candidate.

Students are encouraged to follow, re-blog and share content that has been posted on the Phlebotomy program social media sites. Any commentary that is associated with these postings must follow the guidelines above. A photo release will be signed by each student prior to posting their likenesses on the Phlebotomy program social media sites.

STUDENT PARKING

POLICY

The Cleveland Clinic Parking Department provides safe, reliable, and convenient parking while constantly seeking innovations that enhance quality, service, and customer satisfaction. Patients and visitors to Cleveland Clinic receive the highest priority for on-campus parking. The Parking Department strives to provide students with free parking for the duration of their clinical rotation. Any violation of this policy will result in Progressive Disciplinary Action and appropriate fines.

GENERAL PARKING INFORMATION

- Vehicle maintenance, except for the replacement of a flat tire or other repairs required to safely drive off the lot, is not permitted in the parking areas.
- In the event of construction activities, emergencies, or other situations, parked cars may need to be moved or reassigned to alternate lots.

- Located throughout the parking areas are small car parking spaces. These spaces are reserved for small cars only. The small car designation excludes not just large vehicles but all SUV's, station wagons, minivans, and crossover vehicles.
- **Parking Registration:** All students who intend to park a vehicle on Cleveland Clinic property during their scheduled work hours must register with the Parking Department for a parking assignment. Each student is assigned to a specific parking area. Students are required to park in their assigned parking area during all work hours. This assigned area should not be used by the student at times other than when they are working on-campus.
- **Student Program Parking:** Parking assignments for all Cleveland Clinic student programs will be at no charge. Students must have a Cleveland Clinic ID badge to receive a parking assignment.
- **Parking Permits:** Once registered, the student is given a permit in the form of a decal. This permit must be displayed in the student's registered vehicle(s) during all work hours for identification.
 - If a student drives additional cars to work, the Parking Department will register the additional vehicles and issue extra permits. If a student drives an unregistered vehicle to work, the Parking Office must be notified of the temporary change of vehicle. If the change of vehicle is for less than 24-hours, call the parking office to give proper notification of the change.
 - If the change is for more than 24-hours, the student must obtain a temporary permit from the parking attendant. The attendant will take the student's information and submit it to the Parking Office. The student can then pick up the temporary permit from the attendant the following business day.
- **Parking Fees:** Lost or stolen ID badges and window decals can be replaced. The fee for replacement varies and is determined by Parking Services. The window decal is replaced by Parking Department, and the ID Badge is replaced by the ID Badge Department.
- **Parking Violation Fines:** The registered owner, permit registrant, or operator shall be held responsible for the indicated fine for any violation of the Parking Policy. All registered parking users consent to the enforcement of parking fines, and the charges of the fines. Every parker charged and fined has the right to appeal. This process is described further below. Students receiving violation tickets are subject to fines.
- **Payment of Fines:** Fines shall be paid by check, money order, or credit card at the Parking Office within fifteen (15) calendar days from the date of the ticket. **Cash payments cannot be accepted.** The Parking Violation Ticket must accompany payment.
 - Contesting of Parking Violations is permitted and must be made in writing within ten (10) calendar days of the violation date. A copy of the parking violation and written explanation must be sent to the Parking Office by inter-department or ordinary mail. No oral appeals will be considered. All written appeals must include full name, student number, ticket number, Cleveland Clinic and / or home phone number, and explanation of why violator

believes ticket should be voided. If the appeal is incomplete or illegible it will not be considered.

- The student may appeal a violation as described above. If the appeal is granted the violation will be waived, and no further action is required by the violator. If the appeal is not granted the violator must pay the fine as described above. All decisions concerning appeals are final.
- Parkers are responsible for the willful or careless destruction of Cleveland Clinic Property, including, but not limited to gates, fences, lawns, landscaping, etc. Individuals who are found responsible for such damages will be liable for the full cost of damages.
- **Immobilization or Towing of Vehicles:** Immobilizing or towing of motor vehicles will be ordered if a vehicle is impeding traffic, creating a hazard to public safety, or in repeat violation. Other violations that could cause a vehicle to be towed and immobilized include displaying a hang tag that has been reported as lost, stolen, or counterfeited, and moving cones and barricades from parking spaces. The Cleveland Clinic Parking Department reserves the right to immobilize or tow a vehicle on the first illegal parking offense. All immobilization removal charges or towing fees will be at the owner's or driver's expense.
- **Disability/Handicap:** Students using Disability/Handicap permanent hang tags or license plates must be displayed at all times. This hang tag must be verifiable, valid and be used with proper identification. Handicap registrations must be verified and filed at the Parking Office prior to utilizing the parking space. Noncompliance will be considered a violation of the parking policy. Students who are experiencing a temporary disability may apply for a special handicapped pass. The student must obtain and submit authorization from their attending physician and present it to the Parking Office for approval. Issuance of the handicapped pass will allow temporary (maximum of three (3) months) use of spaces designated "Reserved for the Handicapped." Any violation of this policy will be considered to be a violation of policy.
- **Carpooling:** Cleveland Clinic encourages carpools in an effort to alleviate the parking shortage on campus. Carpools must be registered through the Parking Office. There shall be no more than one (1) registered carpool vehicle parking at Cleveland Clinic at any time and the registered vehicle must be parked in the assigned location. Violation of this will result in the loss of carpool privileges. To facilitate the organization of a carpool, visit the Parking website at: <http://intranet.ccf.org/carpool/>

SUBSTANCE ABUSE

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 environment for its students, trainees, employees, patients and visitors. Consistent with the spirit and intent of this commitment, Cleveland Clinic prohibits:

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

DEFINITIONS

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.

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

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.

POLICY IMPLEMENTATION

SCOPE

This policy applies to students. If program leadership learns of the impairment of a student who is also an employee, they shall consult with Human Resources to implement the Employee 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 academic 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 will be subject to disciplinary action up to and including program dismissal.

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 must 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.

TELEPHONE AND CELLULAR PHONE USE

PURPOSE

To provide guidance on the appropriate use of business telephone and voicemail systems as well as personal cellular phones or similar devices.

POLICY STATEMENT

Cleveland Clinic maintains telephone systems for business purposes as a vital link to our patients and community. For this reason, Cleveland Clinic discourages the making or receiving of personal calls or engaging other non-work related activity with a phone during working hours either on hospital owned phones or personal cellular phones. This policy is also intended to provide and maintain a quiet, healing environment, and to protect patient confidentiality. Use of cellular phones in patient care areas will be permitted at the discretion of departmental management.

For the purposes of this policy, the term "cellular phone" is defined as any handheld electronic device with the ability to receive and/or transmit voice, text or data messages without a cable connection (including but not limited to cellular phones, Smartphones, tablets, digital wireless phones, radio-phones, telephone pagers, PDAs (personal digital assistants) with wireless communications capabilities which may or may not have the capability to take pictures and videos. Cellular phone devices may also be considered any device capable of being networked by a private network provider to obtain information and send information over the internet.

POLICY IMPLEMENTATION

PERSONAL TELEPHONE CALLS

Cleveland Clinic understands that students may periodically need to make and receive personal calls during program hours. Such calls, whether utilizing Cleveland Clinic telephone equipment or personal cell phones and relating to personal, non-emergency issues during program hours, are disruptive to the normal flow of business and should be strictly limited. When at all possible, personal calls during program hours should be limited to the use of personal cellular phones in authorized non-working areas during breaks or meal periods.

CELLULAR PHONES

While at work, students are expected to exercise the same discretion in using personal cellular phones as they use with Cleveland Clinic telephones. Excessive personal calls, text messaging, social media activity, or internet activity during the workday, regardless of the device used, can interfere with student learning and be distracting to others. Students should restrict all such activity during program hours, and should use personal cellular phones only during scheduled breaks or lunch periods in non-working areas and avoid patient care areas when possible. Cellular phone devices should be on vibrate

or silence mode when carried by students on Cleveland Clinic premises during program hours. Cellular phones and smart watches are prohibited in the clinical and student lab areas.

Students are not allowed to have their cellular phones in the clinical laboratory areas at any time. If caught with a cell phone in a clinical area, they will be given a verbal warning. Instances of cell phone use in unauthorized areas will decrease the overall Professionalism grade for the cohort.

PHOTOGRAPHING

The use of audio recording and/or electronic imaging function of cell phones (i.e. cell phone cameras) or of any other devices with similar capabilities is prohibited on Cleveland Clinic premises in patient care areas.

WEATHER EMERGENCIES

PURPOSE

To set forth the expectations for student attendance during a declared weather emergency.

POLICY STATEMENT

It is the policy of Cleveland Clinic to remain open during any weather emergencies. Students are expected to make all reasonable efforts to report to clinicals as scheduled, which may include leaving home earlier than usual.

DEFINITIONS

Weather Emergency - The Chief of Operations for the Enterprise, or their designee, will make the determination if a weather emergency should be declared with respect to any particular shift so as to invoke the provisions of this policy. Weather emergencies are typically declared after the weather event and after its impact has been assessed.

POLICY IMPLEMENTATION

Late Arrival: Occurrences of tardiness or late clock in as defined under the Attendance Policy on a declared weather emergency shift will not be counted for purposes of disciplinary action.

Absence: Students who are unable to come in to the lab will have the time counted as unexcused PTO unless excused by the Program Director.

Students Requesting to Leave Early: Students who request permission to leave early during extreme weather conditions may, with the Program Director's approval, be permitted to do so without using personal time or penalty.

Declared Weather emergencies: If a weather emergency has been declared, then students will not be penalized for arriving late. If a student does not come in at all on that day, the time will be considered unexcused.

WORKPLACE VISITATION

PURPOSE

To provide clear expectations to maintain a safe, professional, secure, confidential, and healing patient care environment and ensure that the learning environment is free from the distraction of personal visitors or personal business activities.

POLICY STATEMENT

Cleveland Clinic is committed to providing a healing patient environment that is secure, free from unnecessary noise and disruption, and ensures a healing patient environment and maintains patient privacy and confidentiality. For this reason, except when authorized by the Program Director, workplace visitation of students, including but not limited to relatives and friends of students, is inappropriate.

DEFINITIONS

Visitors: For purposes of this policy, visitors include personal visitors such as family members and friends of students, employees from other departments, or individuals who do not have official business with a particular department.

POLICY IMPLEMENTATION

WORKPLACE VISITATION

Visitation of students in a shared or common learning area is strongly discouraged. Students are responsible for advising family members and friends not to visit the workplace and for limiting the duration of those personal visits that are unexpected or outside of the student's control. Exceptions to this policy require authorization of the Program Director and are expected to minimize disruption to the learning environment.

CONDUCTING PERSONAL BUSINESS

Students may not conduct personal business in the shared or common learning areas during program hours or use Cleveland Clinic resources for personal business. These restrictions apply to the use of Cleveland Clinic computers, telephones, cellular phones and the use of the organization's address for delivery of personal packages or mail.

POLICY VIOLATIONS

Violations of this policy may be subject to disciplinary action, up to and including program dismissal.