Compliance

There are a number of ways in which students are required to take steps to ensure they are in compliance with the rules and regulations that govern medical student education. Many of these steps are completed on a recurring basis throughout a student’s medical education career. Students are contacted at appropriate intervals to make them aware of their responsibilities to meet these requirements and to notify them about the process for doing so. Failure to complete the requirement by the stated deadlines will result in removal from educational activity. These areas include, but are not limited to:

- Standards of Conduct Policy Training
- Signing of Student Honor Code (see relevant section of the MD Gateway for more information)
- Patient Confidentiality/HIPAA training
- Criminal background checks
- Drug screenings
- Immunizations
- VUMC Hand Hygiene Training
- Bloodborne Pathogens Training
- Infection Control Training
- Fire Safety Training
- Emergency Preparedness Training
- General Compliance and Fraud, Waste, and Abuse
- N95 Mask Fit Training
- Documenting maintenance of current BLS Certification
- Vanderbilt University Requirements
  - Protecting Youth (with annual renewal)
  - Diversity, Equity, & Inclusion for Students (with annual renewal)
  - Sexual Assault Prevention for Graduate Students

Additional details on selected areas of compliance follow:

Personal and Professional Integrity

The practice of medicine is a public profession which carries with it the potential for inflicting a substantial degree of harm. As such, a doctor’s character and fitness to practice medicine must be established as a prerequisite to licensure. To ensure the accuracy of the student record as the School of Medicine represents a graduate to these agencies, each student is responsible for disclosing disciplinary and criminal matters that occur during medical school attendance within seven days of any occurrence. In order to report such matters, contact the Associate Dean
for Medical Student Affairs. Failure to do so may be grounds for dismissal from the School of Medicine.

**Criminal Background Checks**

The VUSM has a responsibility to ensure that all medical students maintain a level of professionalism and safety consistent with the values and expectations of anyone entrusted with the care of patients. Clinical training begins in the first year of medical school at Vanderbilt and extends through all four years of training, and it occurs at Vanderbilt-based hospitals as well as a range of affiliated hospitals and clinical sites throughout metropolitan Nashville and the United States.

VMS students may need a Criminal Background Check (CBC) in order to participate at clinical locations as a part of the required curriculum or as part of an elective rotation. The School of Medicine has contracted with Certiphi Screening, Inc. to do online data entry and permissions for our students to have the checks as needed. For some clinical locations, the check is required within 90 days of the rotation. You will receive an emailed link requesting the needed data from Certiphi. You will also receive a copy of the results by email, and the Registrar’s Office will receive information concerning the CBC. We will do an attestation on your behalf to the clinical location requesting the information.

If a CBC reveals a disqualifying item, the information will be submitted to the Criminal Background Check Review Committee (CBCRC) for review. Refusal to submit to a criminal background check will be considered a positive result.

**Rotations at the Veterans Administration Hospital (Nashville Campus)**

All MD students will complete compliance requirements for access to VA facilities. As part of this process, all students will be fingerprinted and complete additional training modules. This takes place prior to entering the clerkship year.

**Drug Screening**

Drug screening is required by some clinical sites. VUSM has contracted with Certiphi Screening, Inc. to process these 10-panel screens through Student Health. Students needing a drug screen must first receive a collection form from the Registrar’s Office and then make an appointment at Student Health. These screens are often required within 30 days of the start of your rotation. Processing may take up to four days, so students must be pro-active in beginning this process well in advance of the start date.

If a positive screen occurs, students will not be able to rotate at the assigned location until a clear screen is obtained. Refusal to be screened will be considered a positive screen.

**HIPAA and Epic Electronic Medical Record (EMR) Use**

Patient information is protected by the Health Insurance Portability and Accountability Act (HIPAA). This protects the information accessed through Epic EMR for any patient, employee, or student. Students must be familiar with the provisions of this act and respect its intent at all times. HIPAA
regulations apply to faculty, staff, house staff, students, trainees, and volunteers at VUMC and its affiliated entities. Students are required to be in compliance with HIPAA each year.

**Immunizations and Blood-borne Infections**

The State of Tennessee requires certain immunizations for all students. In addition, there are requirements that are specific to healthcare students. Students must be compliant in order to register for courses and continue in their course of study. Students are responsible for consulting the Student Health Center website to ensure their compliance. Students with blood-borne infections (HIV, Hepatitis C, and Hepatitis B) will be required to undergo further health screening, at the Student Health Center, upon arrival on campus. It is a University policy that these infections are self-disclosed by healthcare students and employees so that continuity of care for the student is arranged and patient safety is assured.

**Exposure to Blood and Body Fluids or Other Potentially Infectious Materials**

In the case of a student being exposed to potentially infectious materials, he/she should follow procedures as outlined on the information card provided at student orientation. The student should report to the Occupational Health Clinic (OHC) or the Emergency Department (if OHC is closed) and provide his/her insurance information. Students should make it known that they are not an employee and that a Worker’s Compensation claim should not be filed. Students are not responsible for charges incurred for medical assessment and treatment related to an exposure, but he/she will need to manage the bills that may result. Unpaid bills and associated Explanation of Benefits (EOB) statements from your insurance company are to be taken to Rose Hearn in the Zerfoss Student Health Center for review and payment.

**N-95 Mask Fit Training**

An annual N-95 Respirator fitting is required for all MD students. VEHS has loaned the School of Medicine a PAPR hood for individuals who have been approved for a N-95 exemption. PAPR use is available for individuals that meet the following criteria:

- Unable to be successfully fit tested with a N-95 respirator
- Unable to be medically cleared for a N-95 respirator
- Unable to be free of facial hair for religious reasons