



Policy Name:	Code of Conduct
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Code of Conduct

Policy Statement

Noorda-COM's core values include cultural awareness, ethical leadership, embraces diversity and inspires a servant's heart towards caring for the poor and needy. The College believes in graduating students who can provide exemplary and professional care to their patients.

Noorda-COM faculty, credentialed instructional staff, staff, and students are expected to be responsible individuals who possess the highest standards of integrity, honesty and personal conduct. Accordingly, students are expected to comply with institutional rules and to uphold and carryout the high standards of the osteopathic medical profession.

These traits are prerequisites to independent learning, professional development, the successful performance of academic and clinical assignments, and the conduct of one's personal life. Accordingly, faculty, credentialed instructional staff, staff and students are expected to adhere to a standard of behavior consistent with the College's high standards at all times on and off campus. Compliance with institutional rules and regulations, in addition to city, state and federal laws, is required of all students.

Noorda-COM is dedicated to advancing health equity at every point of contact. With growing concerns about health inequities and the need for health care systems to reach increasingly diverse patient populations, cultural competence from faculty, credentialed instructional staff, staff, and students is essential. In promoting awareness of cultural beliefs and attitudes these competencies can translate into better health care.

Code of Professional Conduct

It is not possible to enumerate all forms of inappropriate behavior. The following, however, are examples of behavior that could constitute a violation of College policy. Accordingly, Noorda-COM has established the following Code of Professional Conduct, indicating behavior that is subject to disciplinary action:

- Harassment, harm, abuse, damage, or theft to or of any individual or property
- Physical or verbal abuse or the threat of such abuse to any individual
- All forms of dishonesty:
 - Cheating
 - Plagiarism

- Knowingly furnishing false information to the College
 - Forgery
 - Alteration
 - Unapproved use of records
- Entering or using Noorda-COM or hospital/clinic/research facilities without authorization
- Disrupting teaching, research, administrative or student functions of the College
- Actions resulting in being charged with a violation of federal, state or local laws, excluding minor traffic violations;
 - Failure to report such charges/violations to Noorda-COM administration within 48 hours
- Participation in academic or clinical endeavors at Noorda-COM or its affiliated institutions while under the influence of
 - Alcohol
 - Non-prescribed controlled substances
 - Illicit drugs
- Unlawful use, possession or distribution of:
 - Alcohol
 - Non-prescribed controlled substances
 - Illicit drugs
- Placing a patient in needless jeopardy
- Unethical disclosure of privileged information
 - See FERPA Policy
 - See HIPAA Policy
- Behavior or appearance that demonstrates abusive or disrespectful conduct toward
 - Members of the faculty
 - Credentialled Instructional Staff
 - Administrative or professional staff
 - Employees
 - Students
 - Patients
 - Visitors of the College
 - Hospital, Clinic, or Other Healthcare Staff
- Violation of any established rules, regulations, and policies of Noorda-COM:
 - Departments
 - Endorsed organizations
 - Affiliated institutions
 - Failure to report an observed violation.
- Conspiring, planning or attempting to achieve any of the above acts.

Inappropriate & Unprofessional Behaviors

During scheduled classes, the following behaviors are considered inappropriate and unprofessional by students:

- Any disruptive behaviors that detract from learning by other students (e.g., talking, making excessive noise, playing games).

- Any disrespectful behaviors toward the faculty member (e.g., talking, inappropriate questions, inattentive behaviors).
- Any discriminating or harassing behaviors on the basis of age, color, creed, marital status, medical condition, national or ethnic origin, race, religion, cultural heritage, gender, sexual orientation, gender identity, political affiliation, disability, genetic information, amnesty, or status as a covered veteran in accordance with applicable federal, state and local laws or any other individual personal attribute. (See No-Discrimination and Anti-Harassment Policy for complete details)
- Students exhibiting inappropriate and unprofessional behaviors may be referred to the Professionalism Academics and Clinical Committee (PACC).

Academic Dishonesty

The College holds its students to the highest standards of intellectual and professional integrity. Therefore, the attempt of any student to pass any examination by improper means, present work which the student has not performed, or aid and abet a student in any dishonest act will result in disciplinary action, which may include immediate dismissal. Any student witnessing or observing a perceived violation of academic integrity is required to report it. Students failing to report an observed violation will also subject to disciplinary action up to and including immediate dismissal.

Alcohol & Drugs

A link to the Drug and Alcohol Policy is available on the Noorda-COM eNCOMpass. Noorda-COM is committed to providing a safe, healthy learning community for all its members. The College recognizes that the improper and excessive use of alcohol and other drugs may interfere with the College's mission by negatively affecting the health and safety of students, faculty, credentialed instructional staff and staff. It is due to the harm caused by excessive and illegal use that the College has a vested interest in establishing policies to prohibit unlawful behavior and sanctions to address policy violations by members of the College Community.

Under the Drug-Free Schools and Communities Act (DFSCA) and in accordance with the Drug-Free Schools and Campuses Regulations (EDGAR), the College is required to have a drug and alcohol abuse and prevention policy and distribute this policy annually to all employees and students. This policy must outline the College's prevention, education and intervention efforts, and consequences that may be applied by both the College and external authorities for policy violations. The law also requires that individuals be notified of possible health risks associated with the use and abuse of alcohol and other drugs, and sources of assistance for problems that may arise as a result of use.

All members of the campus community also are governed by laws, regulations and ordinances established by the state and local municipalities, and will be held accountable by law enforcement representatives of those entities for any illegal activity. It is the responsibility of all campus members to be aware of these laws.

Drug & Alcohol Abuse & Prevention

Noorda-COM Alcohol & Other Drugs Policy

The dispensing, selling or supplying of drugs is prohibited. For the purpose of this policy, the term 'drug' includes:

- Controlled substances, as defined in 21 USC 802, which cannot be legally obtained,
- Legally controlled substances which were not legally obtained, including Prescribed drugs;
 - When prescription is no longer valid (e.g. use of medication after a course of treatment is completed)
 - Used contrary to the prescription
 - Issued to another person

The dispensing, selling or supplying of alcoholic beverages to a person under 21 years old is prohibited. Employees, students, faculty and campus visitors while on College property, driving a College vehicle or while otherwise engaged in College business may not unlawfully:

- Be under the influence of alcohol
- Illicit drugs or controlled substances
 - Manufacture, consume, possess, sell, distribute, transfer

Any person taking prescription drugs or over-the-counter medication is personally responsible for ensuring that, while taking such drugs or medications, he/she is not a safety risk to themselves and others while on College property; while driving a College or privately-owned vehicle; or while otherwise engaged in College business.

Misusing prescription drugs can result in disciplinary action at Noorda-COM and, potentially, conviction with jail time. Additional information pertaining to employee drug and alcohol use along with the College's right to require post-accident drug and alcohol screening or screening based on reasonable suspicion can be located in the Noorda-COM employee and student handbooks.

Entities Affected by the Policy

- Faculty
- Full-time employees, professional and non-professional
- Credentialed instructional staff
- Staff
- Third Party Contractors
- Visitors
- Students

Policy Procedures

Noorda-COM Drug & Alcohol Abuse Prevention Strategies

The College uses evidence-based strategic interventions, collaboration, innovation and the incorporation of wellness programs to reduce harmful consequences of alcohol and other drug use. Strategies include:

- Providing education and awareness activities
- Offering substance-free social and extracurricular, and public/community service options
- Creating a health conscious environment
- Restricting the marketing and promotion of alcohol and other drugs
- Limiting availability of alcohol
- Developing and enforcing campus policies and enforcing laws to address high-risk and illegal alcohol and other drug use
- Providing early intervention and referral for treatment.

Counseling & Treatment Programs

Education

Noorda-COM implements the Under the Influence Course for our students. All Noorda-COM students are encouraged to complete this online module, and those that violate our alcohol policy are required to complete this module. Marijuana 101 is a module that is required for all students who violate our drug policy. Both modules are also available to College employees upon request.

Noorda-COM also encourages students to complete the Prime for Life® course through the State of Utah. Prime for Life® is an evidence-based, risk reduction drug and alcohol education program; it is not substance abuse treatment. Prime for Life® simply presents straightforward, research-based information in a relaxed environment. It is a full-day course and can be required for faculty, staff, students that violated the code of conduct. It is offered in multiple locations in Salt Lake City.

Counseling

Noorda-COM encourages students to utilize our counseling center. Counselors are dedicated to provide confidential resources to assist students who are directly or indirectly affected by alcohol and other drug abuse. They can provide education, referrals, assessment, and support to all campus community members.

On Campus Support Services

Alcohol Free Activities: All programs on and off campus that are sponsored events, are alcohol free.

Alcohol Awareness Tables: Under the direction of the Associate Dean for Student Affairs, alcohol education tables are staffed either by trained student leaders or counselors from the student counseling center, often during the days leading up to a college dance.

National Alcohol Screening Day: Every spring semester, the student counseling center advertises and manages the National Alcohol Screening Day for our students, faculty, and staff.

Orientation Discussion/Programs: Our counselors in the student counseling center present to first-year students during orientation.

Binge Drinking Education: Under the direction of the dean of students' office, trained student leaders, a paid educational trainer/consultant, or counselors from the student counseling center present this information to first-year students during orientation.

Conduct Process: At every conduct meeting, a professional staff member has an educational discussion regarding alcohol abuse with students who allegedly violated the student code of conduct regarding alcohol.

Community Support Services

- University of Utah Neuropsychiatric Institute 501 Chipeta Way, Salt Lake City, UT 84108 801-583-2500
- Salt Lake Behavioral Health 3802 S. 700 E., Salt Lake City, UT 84106 801-264-6000
- Valley Behavioral Health – Adult Services 1020 Main St Suite 100, Salt Lake City, UT 84101 801-70-6550
- Highland Springs Specialty Clinic 4460 S Highland Drive, Suite 100, Salt Lake City, UT 84124 801-273-6335

Employee Resources

Noorda-COM offers a number of services for both faculty and staff. This information is located in the staff and faculty handbooks. For information on any of these resources, please contact the human resources office.

- The College's health care provider offers full-time employees a range of free services through the employee assistance program. Available services include face-to-visits with a network provider for behavioral issues, telephonic support for work/life concerns, and crisis support.
- Full-time faculty and staff may qualify for paid leave under the Family and Medical Leave Act. Drug and Alcohol Abuse Prevention Program
- Full-time employees can request accommodation for a disability that limits one or more major life activity. The College will reasonably accommodate qualified

individuals with a disability, unless doing so causes a direct threat in the workplace to these individuals or others, or if the accommodation creates an undue hardship to the College.

National Clearinghouse for Drug & Alcohol Information

800.729.6686

The clearinghouse provides resources for specialists and referrals to local self-help groups.

Students

The College has established expectations for nonacademic student conduct within this catalog and handbook that specifically address the illicit use of alcohol and other drugs as follows:

Noorda-COM's Code of Professional Conduct outlines behaviors subject to disciplinary action, including:

- Participation in academic or clinical endeavors at Noorda-COM or its affiliated institutions while under the influence of alcohol, nonprescribed controlled substances, or illicit drugs.
- Unlawful use, possession or distribution of illegal drugs, nonprescribed controlled substances or alcohol at any time.
- Being under the influence of illegal drugs at any time, whether they are on or off College-owned or controlled property.
- Possession or use of cannabis. Although cannabis may be legal under some state laws, the possession or use of cannabis is a violation of federal law (with or without a prescription). The possession or use of cannabis shall be deemed a violation of federal law, and students are subject to immediate dismissal.
- Sale, use, possession or storage of alcoholic beverages is strictly prohibited on Noorda-COM property and affiliated institutions.

Noorda-COM's Student Code of Professional Conduct and disciplinary actions for Noorda-COM is administered by the Office of Student Affairs. The Associate Dean for Student Affairs is charged with facilitating the resolution process used to determine responsibility. The Associate Dean for Student Affairs works with parties to determine appropriate educational measures and sanctions. These measures cover a wide range of educational sanctions, including but not limited to suspension and expulsion from the institution.

Faculty & Staff

Sanctions for violations by faculty and staff are governed by the Noorda-COM employee handbook. Noorda-COM has zero tolerance for violation of this policy. Violations of this policy may lead to disciplinary action up to and including immediate termination of employment and/or required participation in a substance abuse rehabilitation or treatment program. Such violations may also have legal consequences.

External Sanctions

Violations of laws and ordinances may result in misdemeanor or felony convictions accompanied by the imposition of legal sanctions, which include but are not limited to, the following:

- Fines as determined under local, state or federal laws
- Imprisonment, including up to life imprisonment, for possession or trafficking of drugs such as heroin, cocaine, marijuana, and prescription drugs
- Forfeiture of personal and real property
- Denial of federal benefits such as grants, contracts and student loans
- Denial or loss of full, unrestricted license to practice medicine
- Loss of board certification due to disciplinary issue
- Denial or loss of credentialing by CMS, Medicaid or other insurance plans due to disciplinary issue
- Loss of driving privileges
- Required attendance at substance abuse education or treatment programs.

A full description of federal sanctions for drug felonies can be found at:
<http://www.dea.gov/druginfo/ftp3.shtml>.

This section is not intended as legal advice; individuals should seek independent legal counsel for advice.

Employee Reporting Requirement

Under the Drug-Free Workplace Act, in addition to the other requirements of this policy and College standards, Noorda-COM requires all employees who work in any capacity under a federal grant or contract to notify his/her College supervisor or department head in writing of his/her conviction for a violation of any criminal drug statute occurring in the workplace or on work-related activities no later than five calendar days after such conviction. The supervisor or department head will notify Noorda-COM Human Resources, who will consult with the appropriate staff to satisfy the College's reporting obligations.

Alcohol Marketing Standards

The College will refuse advertising inconsistent with the fundamental mission of the College, or in conflict with the image the College seeks to project or the well-being of the College Community. Examples of advertisements that will not be accepted include:

- Alcoholic beverages
- Tobacco products
- Sex as a product
- Gambling
- Paraphernalia associated with illegal drugs
- Dishonest, deceptive, or illegal advertising.

Distribution of Policy

A copy of the policy statement will be distributed to all faculty, staff and students annually via email at the beginning of the fall semester and/or at the time a student enrolls during the year if outside of the fall semester. New employees will be provided a copy of the policy upon hire.

For More Information

For more information concerning this policy, contact the College's chief compliance officer.

Background Check

Prior to matriculation and prior to beginning third-year clinical rotations, all Noorda-COM students will have a criminal background check performed at their own expense. The background check is to be performed by a certifying organization retained by Noorda-COM. The purpose of the background check is to satisfy federal, state and individual hospital requirements for students participating in clinical activities involving patient care. Any criminal activity occurring prior to or after matriculation must be immediately reported to the Associate Dean of Student Affairs. Failure to report may result in dismissal.

Dress Code

Students must maintain a neat and clean appearance befitting students attending a professional school. Therefore, all Noorda-COM students must use professional judgment when determining what to wear on Noorda-COM's campus.

On campus the mode of dress is determined by each student's professional judgment, unless a department, laboratory or instructor has a dress code for particular activities (an example would be interacting with a real or simulated patient).

Clothing having caricatures, messages, symbols, etc., that can be construed based on societal norms to be vulgar or offensive or contribute to creating a hostile learning environment, are considered to be unacceptable attire and demonstrate inappropriate professional judgment that is subject to review and action by Student Affairs.

Employment

Students are strongly discouraged from seeking off-campus employment during the academic year. Curriculum requirements preclude off campus employment.

Firearms, Explosives & Weapons

The possession or use of firearms, weapons or explosives is prohibited. This includes but is not limited to:

- Firecrackers
- Torpedoes
- Skyrockets
- Rockets
- Roman candles

- Sparklers or
- Other devices containing any combustible or explosive substance used to propel another object.

The policy prohibiting bringing or possessing weapons on this institution's property does not apply in the following circumstances:

- Local, state or federal law enforcement personnel coming onto the institution's property in their law enforcement capacity or in accordance with other lawful authority.
- Use or possession for a legitimate educational purpose under the sponsorship of a faculty member or other institution official, provided the faculty member or official has first obtained appropriate approvals, including the approval of the institution's director of campus operations.
- Use or possession for a lawful purpose within the scope of a person's employment at the institution (e.g., campus security, police).

The College's director of campus operations is the delegated contact for any exceptions to the above-stated prohibitions for authorized activities.

Off-Campus Activities

Off-campus activities are subject to the same laws and penalties governing all citizens. "Campus" refers to all entities owned or operated by the College or its associated corporations.

College Property & Responsibility

Students will be held responsible for damage to College property caused by their negligence or a willful act. Students must pay fully for damages within 15 days after receipt of invoice through the Finance Office. Damage to College property is charged to the responsible student(s) at the total cost of repair or replacement. The student(s) will be subject to disciplinary action, dismissal and/or prosecution on criminal charges. The College is not responsible for the damage, loss or theft of personal property under any condition. The College is also not responsible for the payment of medical services not performed on campus.

Student Discipline Procedures

Complaints involving alleged misconduct by students will be handled according to the following procedures except in those cases where different procedures are prescribed by another College policy (e.g., allegations of sexual harassment, research misconduct). Noorda-COM has established a multi-dimensional approach to adjudicating student misconduct, poor academic performance and/or disciplinary issues.

The following steps are to be followed in any case where a student is alleged to have violated the Code of Professional Conduct as enumerated in this handbook:

- All reports of code violations shall be reported to the Associate Dean for Student Affairs. Reports must be filed in writing and must be signed by the reporting party.
- Student Affairs will review the report and determine if the charge is of the nature to merit an investigation of the allegation(s).
- If the charge is of a nature to merit an investigation, the Associate Dean for Student Affairs, along with the Dean/ Compliance Officer will gather, analyze and investigate the information. (This will be done as quickly as possible, but sometimes the nature of such investigations takes longer to gather evidence and speak with potential witnesses.)
- After all information is gathered, will apply a preponderance-of-the-evidence standard in making a judgment about the validity of the grievance and will then decide how best the alleged misconduct should be adjudicated.
- The Dean will make the final decision as to how the case will be heard and will make a referral to the specific adjudicating body for disposition of the case. The student will also be notified in writing to appear before the appropriate body to have their case heard.
- The multidimensional nature of Noorda-COM's disciplinary system allows for cases to be heard by the Student Promotion Committee (SPC).
- Upon review of the alleged violation and evidentiary findings, the SPC makes a recommendation as to the proposed outcome the Senior Advisory Committee (SAC).
- Senior Advisory Committee (SAC) takes under consideration the SPC recommendations and makes a final decision on the adjudication of the case.
- Once the case has been formally adjudicated, the Chair of the SAC will then communicate in writing (electronically by delivery-receipt) the outcome to the individual(s) involved.
- Appeals of the SAC decision can be made by the student to the Dean within five (5) business days of delivery- receipt of the SAC decision.
- In cases where the information does not merit referral to the SPC or the Professionalism, Academic and Clinical Committee (PACC), the case will be dealt with by Student Affairs staff.

The College reserves the right to address inappropriate behavior that does not clearly fall within the identified Code of Professional Conduct.

Student Disciplinary Committees

Student Promotion Committee

The Student Promotion Committee (SPC) is a committee made up of College faculty and staff, charged with being the primary team responsible for review of the totality of COM students' academic performance. The SPC reviews any student's academic record who has failed any required element for graduation: a course/section/clerkship, a national boards examination, failure to comply with SPC remediation plan (described in following section) and/or any student who has failed to show adequate academic progress in his/her path of study and/or demonstrated concerning lapses in professionalism.

As a part of the comprehensive review, the SPC will make recommendation to Senior Advisory Committee (SAC) as to whether or not the student should be granted remediation after a failure. The SPC has broad authority to review students' records, decide how best the College can assist the student in getting back on track academically and can recommend a broad number of professional options for consideration as part of any final decision.

Composition of the SPC

SPC is responsible for the oversight of the remediation plan of any student who has experienced a failure of an element/course/section required for graduation or has otherwise failed to show adequate academic progress. The subcommittees shall consist of:

- Assistant Dean for Academic Affairs
- Assistant Dean for Clinical Affairs
- Biomedical Sciences Faculty member
- Clinical Sciences Faculty member
- Chairs, Directors and Managers Council member
- Ad hoc faculty representative(s) who may serve as a faculty advisor;
- Ex officio committee advisors requested to be present for committee meetings.

A quorum of committee members is required in order for the SPC to finalize any decision. A quorum is defined as having three (3) members present. The chairperson of the SPC only votes in the event of a tie vote of those members present.

SPC Process

For academic-related failures and reviews, the SPC process is, generally speaking, as follows:

- **Second Course/Section/Clerkship Failure** After a second course/section/clerkship failure, the student will meet with SPC who will review prior remediation plan(s). Additional resources may be involved in the meeting and within the revised remediation plan. All resources that are brought to bear in order to assist a student are at the discretion of the chair.
- **Third Course/Section/Clerkship Failure or National Board Exam Failure** After a third course/section/clerkship failure, any failure of a national board examination, failure to comply with the previously approved remediation plan, or any professionalism concern for behaviors not fitting for a physician, the student will be notified via email/digital letter of a required meeting with the full SPC for review.

Prior to any meeting with the SPC, the student is instructed to meet with the for Student Affairs to better understand the SPC hearing, how the student can best prepare for the hearing, and to answer any questions from the student.

The student is notified, via email, of the time and place of the SPC meeting. The student meets with the SPC.

The SPC then communicates the recommendation to the Senior Advisory Council (SAC). The SAC reviews the recommendations and supporting documentation of that recommendation and comes to a final decision. The Chair of the SAC notifies the student of that decision via email/digital letter.

Decisions of the may consist of, but are not limited to the following:

- Course/section/clerkship or national board exam remediation
- Repeating an academic year of coursework
- Behavioral Health Evaluation
- Leave of Absence
- Dismissal

Recommendations are determined by majority vote of the members of SPC attending the hearing.

The student is given time to consider the decision and can appeal the decision for any reason. The appeals process for any SAC decision is explained to the student after the decision is delivered.

If the student wishes to appeal the SAC decision, he/she will appeal to the Dean of COM. (See Student Discipline Assurances for specific instructions on appeals.)

SPC Meeting Structure

Students are expected to attend the meeting with the SPC in person, except for students on clinical rotations at locations determined to be a substantial distance from either campus. Those students may meet with the SPC via teleconference.

In the event that there are solely remediation plans to review, but no students for an in-person meeting, the SPC may meet virtually via tele- or video-conference at the discretion of the chairperson of SPC.

Executive Session of SPC Meetings

The first portion of each meeting is considered an executive session for review of any student remediation plans currently in progress. New remediation plans that have occurred since the last SPC meeting will be presented by the subcommittee chair first,

followed by updates on process of already existing remediation plans. The SPC will then vote to approve said new remediation plans. The executive session portion of the meeting may be attended by learning specialists, Counseling Services staff, as well as the representatives of Student Affairs and Clinical Education departments, as well as the Student Affairs. Students are not allowed to attend any executive session of the committee.

Official Hearing of SPC Meetings

The official hearing portion of the meeting includes the voting members of the SPC and the student being reviewed. This portion of the meeting is closed to all but voting members of the committee and appropriate administrative support staff of the committee. Proceedings of the closed portion of the official hearing of the SPC meeting are strictly confidential.

Professionalism, Academics and Clinical Committee

The Professionalism, Academics and Clinical Committee (PACC) is a committee made up of College faculty and staff charged with being the primary team for proactively identifying at-risk students and developing the interventions in order to assist students who are struggling.

The PACC committee will review a student's academic record as part of their charge. In addition, the committee will review all qualitative and/or quantitative data and information about the student's co-curricular experience, as well as any information that is available about any personal extenuating circumstances impacting the student's academic success. As a part of this comprehensive review, the PACC will make recommendations and in some cases will mandate specific actions designed to bring to bear all College resources to help the student improve their academic standing. The PACC has broad authority to review students' records, decide how best the College can assist the student academically, and can recommend a broad number of resources designed to support the student intellectually, emotionally and professionally. PACC is not a disciplinary committee.

PACC meetings are not public and the committee follows all privacy guidelines in accordance with FERPA as a part of the processes and procedures.

- **First Course/Section/Clerkship Failure** The student is notified of his/her first course/section/clerkship failure via email/digital letter and informed that they will be meeting with PACC. PACC members and the student will meet together and collaboratively develop an Individual Educational Plan (IEP).

An IEP plan may include, but is not limited to the following:

- Study plan

- Regular meetings with a learning specialist
- regular meetings with a Noorda-COM psychologist

The IEP will include timelines and expected outcomes/behaviors that the student will be expected to adhere to in agreeing to said plan.

The IEP will be signed by the student.

Failure to comply with the IEP can result in an automatic referral to SPC.

Student Discipline Assurances

The following assurances are granted to all students in the handling of all alleged violations of the Code of Professional Conduct:

- **Disciplinary Notification:** Any student charged with an alleged violation of the Code of Professional Conduct will be given written notice. Email notification may serve as written notice.
- **Hearing:** Every student alleged to have violated the Code of Professional Conduct has a right to a hearing. The Noorda-COM disciplinary system is a multi-dimensional system that allows the student the right to a formal hearing through the Student Promotion Committee or a hearing through Student Affairs.
- **Appeal:** All students who are charged and found responsible for a violation of the Code of Professional Conduct have the right to appeal the decision of the Student Promotion Committee and any decision made by staff members within Student Affairs. The student must express his/her intent to appeal any decision within five business days after the initial decision is delivered (verbally or written, whichever is first) to the student. The student must submit an appeal in writing to the Dean. That written appeal should be submitted for review within five business days of receipt of the initial decision.

Appeals must clearly outline the sanction(s) you are appealing along with any compelling argument as to why you are requesting any part of this decision be overturned. For example, if part of the process was perceived as being “unfair,” be very specific and include this in the appeal. Disagreement with College policy is not considered a compelling argument for appeal. The appeal is considered by the Dean with the autonomy to uphold the appealed decision, reverse the decision all together, or change the decision by making the decision either more or less severe. Students can expect a decision on their appeal within ten (10) business days from the time the appeal has been submitted for review.

If the student does not agree with the decision of the Dean of COM they do have the ability to appeal that decision to the President of the College. They have an additional five (5) business days to submit the appeal to the Office of the President for review and consideration. The President has the authority and autonomy to uphold the appealed decision, reverse the decision all together, or change the decision by making the decision either more or less severe. Once the President has

rendered a decision on an appeal, the decision is final with no additional options for appeal.

Sanctions Related to Violations of the Code of Professional Conduct

The following are examples of sanctions that may be imposed as a result of the disciplinary and/or academic review process and may be levied as a result of a disciplinary or academic review hearing. This list is not exhaustive and sanctions are based on the circumstances of the charges. The merits of each case will be considered before sanctions are levied. It is the intent of the judicial system that the sanction(s) imposed are in response to the academic record, student's professional behavior, any patterns of inappropriate personal behavior, and disciplinary history of the individual student.

Other Appropriate Actions

The College reserves the right to place a variety of disciplinary and/or academic sanctions upon a student that are not specifically outlined above, as long as they are approved by the SPC, SAC and/or Dean and/or a member of Student Affairs.

Student Grievances

Noorda-COM is committed to treating all members of the College community (administrators, faculty, staff, students, applicants for employment, third-party contractors, all other persons that participate in the College's educational programs and activities, including third-party visitors on campus) fairly with regard to their personal and professional concerns. The student grievance policy ensures that concerns are promptly dealt with and resolutions reached in a fair and just manner. The College's grievance procedure enables students to bring complaints and problems to the attention of the College's administration. Noorda-COM forbids any retaliatory action against students who present concerns and complaints in good faith. See Student Grievances Policy for more complete details.

College policy strongly encourages students who believe they have a grievance to use all appropriate avenues for informal resolution before initiating the formal grievance procedure. Should such a resolution be impossible, the student may pursue the following options if they wish to file a grievance.

Procedure

Grievances relating to sex discrimination, sexual harassment or sexual violence fall under the purview of Title IX and will be dealt with under separate procedures. For further details on the basis for these kinds of grievances see the Nondiscrimination and Anti-Harassment Policy. All other grievances should be submitted in writing to the Associate Dean for Student Affairs. The written statement should be as specific as possible regarding the action that precipitated the grievance:

- Date
- Location

- Individuals involved (including witnesses)
- Summary of the incident
- Efforts made to settle the matter informally
- Remedy sought.

Except as noted above or as otherwise stated in the College's policies, grievances will be evaluated and investigated in accordance with the [Student Discipline Procedures](#). If deemed necessary, the issue will also be referred to Human Resources or other appropriate leadership team member.

A record of all formal grievances, including written findings of fact and any transcripts or audio recordings, will be kept on file in Student Affairs and in the student's permanent file. An annual report of formal student complaints will be provided to the leadership team by June 1 of each year. Reports will be provided to the leadership team on a more frequent basis if necessary. The College uses student complaints in its ongoing performance improvement process.

Filing a Complaint with the College's Accrediting Agencies

The Commission on Osteopathic College Accreditation (COCA) recognize their responsibility to provide complainants the opportunity to utilize their organizations as a vehicle to deal with specific grievances as well as being a mechanism for reviewing and finally resolving complaints. Complaints that cannot be addressed by the College may be filed with COCA at the following address:

COCA

142 East Ontario Street
Chicago, IL 60611

Information for Crime Victims About Disciplinary Proceedings

The College will, upon written request, disclose to the alleged victim of any crime of violence or a non-forcible sex offense or, if the alleged victim is deceased as a result of the crime or offense to the alleged victim's next of kin the results of any disciplinary proceeding conducted by the institution against a student who is the alleged perpetrator of such crime or offense. Requests for such documentation should be directed to Student Affairs.

Definitions

- **Academic Dishonesty** - Any attempt to pass any examination by improper means, present work which the individual has not performed, or aiding and/or abetting in any dishonest act
- **Utah Alcohol Laws**
 - Driving Under the Influence: It is illegal to drive or be in physical control of a vehicle, even when parked, while under the influence of alcohol or other drugs. Utah's Implied Consent Law requires submission to a blood alcohol

content (BAC) test. Refusal will result in revocation of your license for one year. You are in violation if your BAC is .08 or greater, or the officer judges you to be impaired. It is a Class B misdemeanor for the first and second conviction of driving under the influence of alcohol or drugs, with sentencing of not less than 48 hours in jail and a fine of not less than \$700. In addition, the court hearing the case shall suspend the operator's driving privileges.

- Minors in Possession: It is illegal for minors (under 21) to buy, possess (even hold), or drink alcohol. Penalties: up to six months imprisonment and/or a \$1,000 fine; Class B misdemeanor. When a minor who is at least 18 years old, but younger than 21 years old, is found in violation of this law, the court hearing the case shall suspend the minor's driving privileges.
- Not-a-Drop Law: It is illegal for anyone under 21 years of age to operate a vehicle while there is any measurable alcohol (less than .08) in his or her body. Penalties: A first offense will result in loss of license for 90 days. A second offense within three years of a prior denial or suspension will result in suspension for one year.
- Open Container: It is illegal to drink any alcoholic beverage while operating, or as a passenger in, a vehicle (parked or moving), or have an open container in a vehicle. Once a container is open, one can be arrested for possession. Violating an open container law is a Class B misdemeanor with a maximum penalty of six months imprisonment and/or \$1,000 fine.
- Minors: It is illegal to sell or supply alcohol to a minor under the age of 21. Penalties: up to one-year imprisonment and/or up to \$2,500 fine; Class A misdemeanor.
- Intoxication: It is illegal to drink in a public building, park, or stadium, or to be so intoxicated that you disturb others, or injure yourself or others. Maximum penalty is 90 days imprisonment and/or \$750 fine; Class C misdemeanor. It is also illegal to sell or supply to intoxicated persons or to purchase alcohol if intoxicated. Maximum penalty is six (6) months imprisonment and/or \$1,000 fine; Class B misdemeanor.
- Unlawful Transfer or Use of Identification Card: It is illegal to give or use another's identification card with a maximum penalty of up to six (6) months imprisonment and/or \$1,000 fine; Class B misdemeanor.
 - (1) procure alcoholic beverages,
 - (2) gain admittance where alcohol is sold or consumed, and
 - (3) obtain employment that requires employees to handle alcoholic products.
- Maximum penalty: six (6) months imprisonment and/or \$1,000 fine; Class B misdemeanor.
- Dram Shop Liability: Liability may result to any person who provides alcoholic beverages illegally to underage persons or who provides alcohol to someone who is apparently intoxicated or, given the circumstances, may be under the influence of alcohol or other drugs. If the intoxicated

person causes injury to persons or property while intoxicated, the person who furnished the alcohol is liable for injuries, property, or support to any third person or their spouse, child, or parent.

- **Utah Drug Laws** - it is unlawful to possess, produce, manufacture, distribute, and/or dispense a controlled substance such as cocaine, marijuana, LSD, heroin, steroids, and prescribed medications.
 - Violation of this law may result in charges running from a Class A misdemeanor to a second-degree felony, depending on the type of controlled substance and the circumstances of the crime. Utah Code Ann. § 58-37-4.
 - It is unlawful in Utah to possess or use a controlled substance except pursuant to a valid prescription. Violation of this law may result in charges running from Class B misdemeanor to a second-degree felony, depending upon the quantity of drugs within the individual's possession. Utah Code Ann. § 58-37-8(2).
 - It is a Class B misdemeanor in Utah to use or possess drug paraphernalia. Utah Code Ann. § 58-37a-5.
 - Penalties for drug violations in Utah may include incarceration for varying periods of time, and fines ranging from \$750 to \$10,000 depending upon the nature and circumstance of the offense. Utah law provides for enhanced penalties and charges if the drug violations occur on a college campus.
- **Cocaine (Crack)** - Can cause short-term effects such as impaired judgment; increased breathing, heart rate, heart palpitations; and anxiety, restlessness, hostility, paranoia and confusion. Long-term effects may include damage to respiratory and immune systems, malnutrition, seizures and loss of brain function. Highly addictive.
- **Designer Drugs/Synthetic Cannabinoids** (Bath Salts, K2, Spice) - Can cause short-term effects such as elevated heart rate and blood pressure; chest pain; and hallucinations, seizures, violent behavior and paranoia. May lead to lack of appetite, vomiting and tremor. Long-term use may result in kidney/liver failure, increased risk of suicide and death.
- **Hallucinogens** (PCP, LSD, Ecstasy, Dextromethorphan) - Can cause extreme distortions of what is seen and heard. Can induce sudden changes in behavior, loss of concentration and loss of memory. Increases risk of birth defects in user's children. Overdose can cause psychosis, convulsions, coma and death. Frequent and long-term use can cause permanent loss of mental function.
- **Inhalants** (Nitrous Oxide, Amyl Nitrite, Butyl Nitrite, Chlorohydrocarbons, Hydrocarbons) - Can cause short-term effects such as nausea, dizziness, fatigue, slurred speech, hallucinations or delusions. May lead to rapid and irregular heart rhythms, heart failure and death. Long-term use may result in loss of feeling, hearing and vision. Can result in permanent damage to the brain, heart, lungs, liver and kidneys.
- **Opiates/Narcotics** (Heroin, Morphine, Opium, Codeine, Oxycodone, China White) - Can cause physical and psychological dependence. Overdose can cause coma, convulsions, respiratory arrest and death. Long-term use leads to

malnutrition, infection and hepatitis. Sharing needles is a leading cause of the spread of HIV and hepatitis. Highly addictive, tolerance increases rapidly.

- **Sedatives** - Can cause reduced reaction time and confusion. Overdose can cause coma, respiratory arrest, convulsions and death. Withdrawal can be dangerous. In combination with other controlled substances, sedatives can quickly cause coma and death. Long-term use can produce physical and psychological dependence. Tolerance can increase rapidly.
- **Tobacco** (cigarettes, cigars, chewing tobacco) - Can cause disease of the cardiovascular system, in particular smoking being a major risk factor for a myocardial infarction (heart attack), diseases of the respiratory tract, such as Chronic Obstructive Pulmonary Disease (COPD), and emphysema and cancer, particular lung cancer and cancers of the larynx and mouth. Nicotine is highly addictive. Noorda-COM is a tobacco-free campus.
- **Amphetamines** - Can cause short-term effects such as rushed, careless behavior and pushing beyond your physical capacity, leading to exhaustion. Tolerance increases rapidly. Long-term effects include physical and psychological dependence and withdrawal, which can result in depression and suicide. Continued high doses can cause heart problems, infections, malnutrition and death.
- **Cannabis** - Can cause short-term effects such as slow reflexes, increase in forgetfulness, altered judgment of space and distance; can aggravate preexisting heart and/or mental health problems. Long-term health effects include permanent damage to lungs, reproductive organs and brain function. Can interfere with physical, psychological, social development of young users.
- **College Property** - all buildings and land owned, leased or used by the College, and motor vehicles operated by employees, when used in connection with work performed for or on behalf of the College
- **No Action** - An official response from the disciplinary body indicating that no action be taken in regards to the student's case.
- **Verbal/Written Warning** - Documented warning that the behavior/academic performance demonstrated was unacceptable. Warnings remain in the student's file until the end of each academic year.
- **Required Remediation** - Required corrective academic action. This is required only after a student has failed a course, section, clerkship and/or national examination. Remediation is not guaranteed for any student who has failed a course, section, clerkship and/or national examination.
- **Conditional Requirements** - Official stipulations required of the student in order for the student to reconcile his/her behavior. Stipulations may include, but are not limited to the following:
 - **Academic Probation** - An official status of warning from the College, stating that the student is under the most sensitive academic monitoring and improvement plan, which becomes a part of the student's record for the period of time they are on probation. For specific information regarding academic warning, please review:
 - **Academic Warning** - A status of warning from Noorda-COM to the student indicating that the College is concerned about the student's

academic performance. See the program for specific information regarding academic warning:

- **Clerkship Alterations** - Required change(s) to a student's clerkship that might increase the student's likelihood of successful completion of said clerkship (e.g., changing location, repeating the clerkship, repeating an entire year, repeating a shelf exam, completing an independent study)
- **Counseling Intervention** - Required referral to a mental health provider for counseling when a student's behavior indicates that counseling may be beneficial.
- **Disciplinary Probation** - An official state of warning from the College which states that if the student violates any College policy during the probationary time, he/she could face up to suspension or dismissal depending upon the severity of the violation. The probationary status of the student may be communicated to the student's academic advisor, faculty or any other person who has legal access to this information.
- **First-Year Curricular Change** - A formal decision that a first-year student withdraw with the possibility of readmission, after meeting specified academic criteria.
- **Partial (nonacademic) Suspension** - A partial suspension of a student's normal right to participate in extra-curricular, co-curricular and other nonacademic activities. The student will continue to attend classes and may use all academic resources. The student will not be in good standing during the time of the suspension.
- **Referral to Outside Agency** - The College may refer a student to the Utah Division of Occupational and Professional Licensing (DOPL) or other similar agencies, for assessment and treatment.
- **Required Tutoring/Learning Support** - The College has the authority to require a student to seek mandatory tutoring and/or assistance from a learning specialist if it is deemed appropriate in assisting the student with academic performance issues.
- **Restrictions/Stipulations of Behavioral Activity** - The College may restrict a student's behavioral activity this is deemed appropriate, including but not limited to restricting the student's contact with another student.
- **Restitution or Monetary Fine** - Financial accountability for damage to property, and/or continued disciplinary problems, caused by the student, or a fine that is deemed appropriate for the offense.
- **Restorative Service** - A project or amount of community service hours served by the student for the good of the community. This is usually completed within the community. If the service is approved to be done off-campus, it must be at a not-for-profit organization and the student cannot receive pay for his/her work.
- **Suspension** - A formal separation of the student (without refund) from the College during a specific period of time. The period of suspension can range from one semester to an indefinite period of time. The student will not be in good standing during the suspension.

- **Dismissal** - Permanent separation of the student from Noorda-COM (without refund). Dismissal is permanently noted on the student's Noorda-COM official transcript.
- **Grievance** - a complaint arising out of any alleged unauthorized or unjustified act or decision by an individual (e.g., student, faculty, staff, administrator) that in any way adversely affects the status, rights or privileges of a member of the student body. Such complaints may include, but are not limited to the following:
 - Academic programs or courses
 - Accreditation standards or processes
 - Discrimination
 - Financial aid
 - General mistreatment
 - Harassment, including sexual violence
 - Mentoring
 - Privacy of student educational records
 - Privacy of student health records
 - Parking
 - Research
 - Security and safety
 - Student health

Responsibilities

- President
- Dean
- Dean's Council
- Senior Advisory Committee
- Associate and Assistant Deans
 - Student Affairs
 - Academic Affairs
 - Clinical Affairs
 - Research
- Learning Specialists
- Clinical Psychologist
- Human Resources
- Compliance Officer

Policy Violations

Students, faculty, and employees found to be in violation of this policy will be subject to discipline including written reprimand, termination or dismissal with cause.

The use or abuse of alcohol and other drugs also increases the risks of behavioral and social problems such as negative effects on academic work performance; conflicts with classmates, co-workers, family, friends and others; conduct problems resulting in disciplinary action, including dismissal from an academic program; and legal problems resulting in ticketing, fines and imprisonment.

College policies, local ordinances, state laws and federal laws prohibit the unlawful possession, and use or distribution of illicit drugs and alcohol.

Violation of College policies will be subject to campus disciplinary review pursuant to College policies and consistent with local, state and federal laws. Disciplinary action may include dismissal of individuals and/or sanction of organizations in violation of this policy. Violators may also be subject to the loss of financial aid.

Interpreting Authority

- Board of Trustees

Statutory or Regulatory References

§ 58-37-4

§ 58-37-8(2)

§ 58-37a-5

Title 21 United States Code (USC) Controlled Substances Act 21 USC 802

Drug-Free Schools and Communities Act (DFSCA)

Drug-Free Schools and Campuses Regulations (EDGAR)

Drug-Free Workplace Act

Relevant Links

<http://www.drugabuse.gov>

<http://www.dea.gov/druginfo/ftp3.shtml>

<https://www.deadiversion.usdoj.gov/21cfr/21usc/>

<https://le.utah.gov/xcode/Title58/Chapter37/58-37-S8.html>

Policy Adoption Review and Approval

Dean's Council



Non-Academic Policy

Policy Name:	TITLE IX: Non-Discrimination and Anti-Harassment
Approval Authority:	Board of Trustees
Responsible Executive:	President
Responsible Office(s):	Presidents Council Compliance Officer
Effective:	January 2019
Expires:	January 2024
Last Revised:	n/a
Next Review Date:	n/a

TITLE IX: Non-Discrimination and Anti-Harassment

Policy Statement

Noorda College of Osteopathic Medicine(collectively “the College”) is committed to providing a learning and working (administrative personnel, faculty and staff) environment that promotes personal integrity, civility, and mutual respect in an environment free of discrimination on the basis of age, color, creed, marital status, medical condition, national or ethnic origin, race, religion, cultural heritage, gender, sexual orientation, gender identity, political affiliation, disability, genetic information, amnesty, or status as a covered veteran in accordance with applicable federal, state and local laws or any other individual personal attribute.

The College considers Sex Discrimination (see Definitions) in all its forms to be a serious offense. Sex Discrimination constitutes a violation of this policy, is unacceptable, and will not be tolerated. Sex Discrimination includes discrimination on the basis of pregnancy, gender identity, and failure to conform to stereotypical notions of femininity and masculinity.

Sexual Harassment (see Definitions), whether verbal, physical, or visual, is always inconsistent with the mission and expectations of the College, and may constitute a form Sex Discrimination in violation of this policy. Sexual Harassment also includes Sexual Violence (see Definitions). Examples of specific conduct that constitutes Sexual Harassment and Sexual Violence are set forth below.

This policy prohibits Sex Discrimination, Sexual Harassment, and Sexual Violence when the complainant and alleged perpetrator are members of the same or opposite sex, and it applies regardless of national origin, immigration status, or citizenship status. The College’s prohibition on Sex Discrimination, Sexual Harassment, and Sexual Violence extends to all aspects of its educational programs and activities, including, but not limited to, admissions, employment, academics, and student services.

TITLE IX STATEMENT

It is the policy of the College to comply with Title IX of the Education Amendments of 1972 and its implementing regulations, which prohibit Sex Discrimination in the College's educational programs and activities. Title IX and its implementing regulations also prohibit retaliation for asserting claims of Sex Discrimination.

The College has jurisdiction over Title IX-related complaints regarding conduct that occurred on campus, during or at an official College program or activity (regardless of location), or off campus when the conduct could create a hostile environment on campus. The College will investigate all complaints made under this policy and, if necessary, take action to prevent the recurrence of Sex Discrimination and remedy its effects.

The College has designated the following Title IX Coordinator to coordinate its compliance with Title IX and to receive inquiries regarding Title IX, including complaints of Sex Discrimination:

Title IX Coordinator
TBD

A person may also file a complaint of Sex Discrimination with the United States Department of Education's Office for Civil Rights regarding an alleged violation of Title IX by visiting www2.ed.gov/about/offices/list/ocr/complaintintro.html or by calling 1-800-421-3481.

Entities Affected by the Policy

This policy applies to administrative personnel, faculty, staff, and other College employees; students; applicants for employment; customers; third-party contractors; and all other persons that participate in the College's educational programs and activities, including third-party visitors on campus (the "College Community").

Policy Procedures

Complaints

A. Making a Complaint

The College encourages persons to make initial complaints of Sexual Misconduct as soon as possible to the Title IX Coordinator via email or in-person. All efforts will be made to follow up with complainant as soon as reasonably possible not to exceed two business days.

1. Employees

All College employees, have a duty to file a complaint with the Title IX Coordinator when they believe or receive information indicating that a member of the College Community may have been subjected to conduct that constitutes prohibited Sexual Misconduct. This includes employees who may have a professional license requiring confidentiality if they are not employed by the College in that professional role. An employee not making a report as required by this policy may be disciplined accordingly, up to and including termination.

2. Students

Students who believe they or another member of the College Community may have been subjected to conduct that constitutes prohibited Sexual Misconduct are encouraged to file a complaint with the Title IX Coordinator. Students should also be aware that all employees at the College, have an obligation to report information about Sexual Misconduct that they become aware of or witness. Students may also file a complaint with the United States Department of Education's Office for Civil Rights, as set forth in Section III above.

3. Other Persons

Any other persons who are involved in the College's programs and activities, including visitors on campus, who wish to report Sexual Misconduct should file a complaint with the Title IX Coordinator. They may also file a complaint with the United States Department of Education's Office for Civil Rights, as set forth above.

4. Confidential Discussions

If a victim desires to talk confidentially about his or her situation, there are resources available. The following resources are available to assist you and will not further disclose the information you provide, unless otherwise required to do so by law (e.g., if the victim is a minor):

TBD

5. Content of the Complaint

So that the College has sufficient information to investigate a complaint, the complaint should include: (1) the date(s) and time(s) of the alleged Sexual Misconduct; (2) the names of all person(s) involved in the alleged Sexual Misconduct, including possible witnesses; (3) all details outlining what happened; and (4) contact information for the complainant so that the College may follow up appropriately.

6. Information Provided to Complainant and Respondent

A complainant who makes a claim of Sexual Misconduct to the College will be given a copy of the document titled "Explanation of Rights and Options After Filing a Complaint Under the Title IX Policy." This document provides information about this policy and the Complaint Resolution Procedures used to investigate and resolve complaints of Sexual Misconduct, options for filing complaints with the local police, resources that are available on campus and in the community, etc. A person against whom a complaint has been filed will also be given information about the process.

7. Conduct that Constitutes a Crime

Any person who believes they have been subject to Sexual Misconduct that also constitutes a crime—including Sexual Violence, Domestic Assault, Dating Violence, or Stalking—is encouraged to make a complaint to local law enforcement, as well as to the College's Title IX Coordinator. If requested, the College will assist the complainant in notifying the appropriate law enforcement authorities. In the event of an emergency, please contact 911. A victim may decline to notify such authorities.

8. Special Guidance Concerning Complaints of Sexual Violence, Domestic Violence, Dating Violence, or Stalking

If you are the victim of Sexual Violence, Domestic Violence, Dating Violence, or Stalking, do not blame yourself. These crimes are never the victim's fault. The College

recommends that you immediately go to the emergency room of a local hospital and contact local law enforcement, in addition to making a prompt complaint under this policy.

If you are the victim of Sexual Violence, Domestic Violence, or Dating Violence, do everything possible to preserve evidence by making certain that the crime scene is not disturbed. Preservation of evidence may be necessary for proof of the crime or in obtaining a protection order. Victims of Sexual Violence, Domestic Violence, or Dating Violence should not bathe, urinate, douche, brush teeth, or drink liquids until after they are examined and, if necessary, a rape examination is completed. Clothes should not be changed. When necessary, seek immediate medical attention at an area hospital and take a full change of clothing, including shoes, for use after a medical examination.

It is also important to take steps to preserve evidence in cases of Stalking, to the extent such evidence exists. In cases of Stalking, evidence is more likely to be in the form of letters, emails, text messages, etc. rather than evidence of physical contact and violence.

Once a complaint of Sexual Violence, Domestic Violence, Dating Violence, or Stalking is made, the complainant has several options such as, but not limited to:

- a. Contacting parents or a relative
- b. Seeking legal advice
- c. Seeking personal counseling (always recommended)
- d. Pursuing legal action against the perpetrator
- e. Pursuing disciplinary action
- f. Requesting that no further action be taken
- g. Requesting further information about the College's policy and procedures for addressing Sexual Misconduct
- h. Requesting further information about available resources

9. Vendors, Contractors, and Third-Parties

This policy applies to the conduct of vendors, contractors, and third parties. Persons who believe they have been discriminated against or harassed in violation of this policy should make a complaint in the manner set forth in this section.

10. Retaliation

Retaliation is prohibited by this policy. Retaliation is defined as material, adverse action taken against a person because the person reported or assisted in making a complaint of Sexual Misconduct or otherwise participated in the investigation of complaint in any way. Persons who believe they have been retaliated against in violation of this policy should make a complaint in the manner set forth in this section.

11. Protecting the Complainant

Pending final outcome of an investigation in accordance with the Title IX Complaint Resolution Procedures, the College will take steps to protect the complainant from further Sexual Misconduct or retaliation. This may include assisting and allowing the complainant to change his or her academic, transportation, or work situation, to the extent that the College has control over these environments, if options to do so are reasonably available and upon request of the complainant.

Such changes may be available regardless of whether the victim chooses to report the crime to campus police or local law enforcement. Requests to change an academic, transportation, or work situation, or for any other protective measure, should be made to the Title IX Coordinator.

If a complainant has obtained a temporary restraining order or other no contact order against the alleged perpetrator from a criminal, civil, or tribal court, the complainant should provide such information to the Title IX Coordinator. The College will take all reasonable and legal action to implement the order.

12. Amnesty

The College recognizes that an individual who has been drinking alcohol or using drugs may be hesitant to report Sexual Misconduct. To encourage reporting, the College will not take disciplinary action for drug or alcohol use against an individual reporting Sexual Misconduct, either as the complainant or as a witness, provided that these conduct violations did not and do not place the health or safety of any other person at risk. The College may, however, require the reporting individual to attend a course or pursue other educational interventions related to alcohol and drugs.

The College's commitment to amnesty in these situations does not prevent action by police or other legal authorities against an individual who has illegally consumed alcohol or drugs.

B. Timing of Complaints

The College encourages persons to make complaints of Sexual Misconduct as soon as possible because late reporting may limit the College's ability to investigate and respond to the conduct complained of.

C. Investigation and Confidentiality

All complaints of Sexual Misconduct will be promptly and thoroughly investigated in accordance with the Title IX Complaint Resolution Procedures (see below), and the College will take disciplinary and remedial action where appropriate. The College will make reasonable and appropriate efforts to preserve an individual's privacy and protect the confidentiality of information when investigating and resolving a complaint. However, because of laws relating to reporting and other state and federal laws, the College cannot guarantee confidentiality to those who make complaints. In the event that the complainant's confidentiality cannot be ensured, the College will notify the complainant.

In the event a complainant requests confidentiality or asks that a complaint not be investigated, the College will take all reasonable steps to investigate and respond to the complaint consistent with the request for confidentiality or request not to pursue an investigation. If a complainant insists that his or her name not be disclosed to the alleged perpetrator, the College's ability to respond may be limited. The College reserves the right to initiate and proceed with an investigation despite a complainant's request for confidentiality in limited circumstances involving serious or repeated conduct or where the alleged perpetrator may pose a continuing threat to the College Community.

D. Resolution

If a complaint of Sexual Misconduct is found to be substantiated, the College will take appropriate corrective and remedial action. Students, faculty, and employees found to be in

violation of this policy will be subject to discipline up to and including written reprimand, probation, suspension, demotion, termination, or expulsion. Affiliates and program participants may be removed from College programs and/or prevented from returning to campus. Remedial steps may also include counseling for the complainant, academic, work, transportation, or living accommodations for the complainant, separation of the parties, and training for the respondent and other persons.

E. Bad Faith Complaints

While the College encourages all good faith complaints of Sexual Misconduct, the College has the responsibility to balance the rights of all parties. Therefore, if the College's investigation reveals that a complaint was knowingly false, the complaint will be dismissed and the person who filed the knowingly false complaint may be subject to discipline.

ACADEMIC FREEDOM

While the College is committed to the principles of free inquiry and free expression, conduct constituting Sexual Misconduct is neither legally protected expression nor the proper exercise of academic freedom.

EDUCATION

Because the College recognizes that the prevention of Sexual Misconduct, as well as Domestic Violence, Dating Violence, and Stalking, is an important issue, it offers educational programming to a variety of groups such as: campus personnel; incoming students and new employees participating in orientation; and members of student organizations. Among other items, such training will cover relevant definitions, procedures, and sanctions; will provide safe and positive options for bystander intervention; and will provide risk reduction information, including recognizing warning signs of abusive behavior and how to avoid potential attacks. To learn more about education resources, please contact the Title IX Coordinator.

TITLE IX: COMPLAINT RESOLUTION PROCEDURES

I. GENERAL PRINCIPLES

A. Administration

For purposes of these complaint resolution procedures, "Investigating Officer" means the Title IX Coordinator or his/her designee. The Investigating Officer shall have responsibility for administering these complaint resolution procedures.

B. Promptness, Fairness and Impartiality

These procedures provide for prompt, fair, and impartial investigations and resolutions. The Investigating Officer shall discharge his or her obligations under these complaint resolution procedures fairly and impartially. If the Investigating Officer determines that he or she cannot apply these procedures fairly and impartially because of the identity of a complainant, respondent, or witness, or due to any other conflict of interest, the Investigating Officer shall designate another appropriate individual to administer these procedures.

C. Training

These procedures will be implemented by officials who receive annual training on the issues related to Sex Discrimination, Sexual Harassment, Sexual Violence, Domestic Violence, Dating Violence, and Stalking and on how to conduct an investigation that protects the safety of victims and promotes accountability.

II. INVESTIGATION AND RESOLUTION OF THE COMPLAINT

A. Commencement of the Investigation

Once a complaint is made, the Investigating Officer will commence an investigation of it as soon as practicable. The purpose of the investigation is to determine whether it is more likely than not that the alleged behavior occurred and, if so, whether it constitutes Sexual Misconduct. During the course of the investigation, the Investigating Officer may receive counsel from College administrators, the College's attorneys, or other parties as needed.

In certain narrow circumstances, the Investigating Officer may commence an investigation even if the complainant requests that the matter not be pursued. In such a circumstance, the Investigating Officer will take all reasonable steps to investigate and respond to the matter in a manner that is informed by the complainant's articulated concerns.

B. Content of the Investigation

During the investigation, the complainant will have the opportunity to describe his or her allegations and present supporting witnesses or other evidence. The respondent will have the opportunity to respond to the allegations and present supporting witnesses or other evidence. The Investigating Officer will review the statements and evidence presented and may, depending on the circumstances, interview others with relevant knowledge, review documentary materials, and take any other appropriate action to gather and consider information relevant to the complaint. All parties and witnesses involved in the investigation are expected to cooperate and provide complete and truthful information.

C. Support Person

During the investigation process, both a complainant and a respondent may ask a support person to accompany him or her at all stages of the process. In cases involving multiple complainants or respondents, the support person cannot be another complainant or respondent. The support person does not serve as an advocate on behalf of the complainant or respondent, may not be actively involved in any proceedings, and he or she must agree to maintain the confidentiality of the process. A support person may be removed if he or she becomes disruptive or does not abide by the limitations discussed in the previous sentence.

D. Interim Measures

At any time during the investigation, the Investigating Officer may determine that interim remedies or protections for the parties involved or witnesses are appropriate. These interim remedies may include separating the parties, placing limitations on contact between the parties, suspension, or making alternative class-placement or workplace arrangements. Failure to comply with the terms of these interim remedies or protections may constitute a separate violation of the Title IX: Non-Discrimination and Anti-Harassment Policy.

E. Pending Criminal Investigation

Some instances of Sexual Misconduct may also constitute criminal conduct. In such instances, the complainant is also encouraged to file a report with the appropriate law enforcement authorities and, if requested, the College will assist the complainant in doing so. The pendency of a criminal investigation, however, does not relieve the College of its responsibilities under Title IX. Therefore, to the extent doing so does not interfere with any criminal investigation, the College will proceed with its own investigation and resolution of the complaint.

F. Other Policy and Standards Violations

In the course of conducting an investigation under these procedures, the Investigating Officer may identify evidence establishing that College policies and standards, other than the Title IX: Non-Discrimination and Anti-Harassment Policy, were violated. The College reserves the right to take immediate action to address such other violations of policies and standards, irrespective of whether the investigation determines that Sexual Misconduct occurred. In addition, in cases involving a visitor or contractor as a respondent, the College reserves the right to take summary action to permanently prohibit such person from entering onto College property and/or to terminate the respondent's relationship with the College, irrespective of whether the investigation determines that Sexual Misconduct occurred.

G. Resolution

At the conclusion of the investigation, the Investigating Officer will prepare a preliminary written report. The preliminary written report will identify the relevant evidence collected during the investigation, identify findings of fact, and state whether any allegations in the complaint were found to be substantiated by a preponderance of the evidence. The parties shall be given three (3) days to review a copy of the preliminary written report in a proctored setting. After review of the preliminary written report, each party will be given three (3) days to submit any comments or response, in writing, to the Investigating Officer. Thereafter, the Investigating Officer will consider the parties' submissions, if any, and will finalize the written report and transmit a copy to the Title IX Coordinator.

If the written report determines that Sexual Misconduct occurred, the Title IX Coordinator will confer with administrators with supervisory authority over the respondent and identify those steps necessary to maintain an environment free from Sexual Misconduct and to protect the safety and well-being of the complainant and other members of the College community. Such actions will also include reasonable steps to correct the effects of such conduct on the complainant and others and to prevent the recurrence of Sexual Misconduct and retaliation. Examples of such action include: no-contact orders, academic reassignment, the provision of counseling or other support services, training, and discipline for the perpetrator, including up to termination, expulsion, or other appropriate institutional sanctions.

Thereafter, the Title IX Coordinator will provide the parties with a brief, written determination of the investigation. If necessary, the version of the determination provided to the complainant and/or respondent will be redacted to ensure that information concerning any remedial and/or disciplinary measures is disclosed in a manner consistent with Title IX, the Family Educational Rights and Privacy Act ("FERPA"), and the Clery Act, as explained by the April 4, 2011 Dear Colleague Letter issued by the U.S. Department of Education, available at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201104.pdf>.

The written determination shall be final subject only to the right of appeal set forth in Section IV below.

H. Special Procedure Concerning Complaints Against the President and Executives

If a complaint involves alleged conduct on the part of the College President, the College Board of Trustees will designate the Investigating Officer. Based on the information gathered by the investigation, the College Board of Trustees will prepare and issue the written report determining the complaint. The determination of the College Board of Trustees is final and not subject to appeal.

If a complaint involves alleged conduct on the part of a College Executive, the College President will designate the Investigating Officer. Based on the information gathered by the investigation,

the College President will prepare and issue the written report determining the complaint. The determination of the College President is final and not subject to appeal.

I. Informal Resolution

Informal means of resolution, such as mediation, may be used in lieu of the formal investigation and determination procedure. However, informal means may only be used with the complainant's voluntary cooperation and the involvement of the Title IX Coordinator. The complainant, however, will not be required to work out the problem directly with the respondent. Moreover, either party may terminate any such informal means at any time and elevate the complaint to the formal process.

J. Timing Of the Investigation

The College strives to complete its investigation and resolution in a reasonably prompt manner. The time it takes to complete an investigation and resolution will vary depending on all the facts and circumstances, including the nature and complexity of the allegations, the availability of witnesses, and intervening breaks in the College's calendar. Both the complainant and the respondent will be given periodic updates regarding the status of the investigation.

III. RIGHTS OF THE PARTIES

During the investigation and resolution of a complaint, the complainant and respondent shall have equal rights. They include:

1. Equal opportunity to identify and have considered witnesses and other relevant evidence
2. Similar and timely access to evidence considered by the Investigating Officer in preparing the written report
3. Equal opportunity to review any statements or evidence provided by the other party

Equal access to review and comment upon any evidence independently developed by the Investigating Officer

IV. APPEALS

A. GROUNDS OF APPEALS

The complainant or respondent may appeal the determination of a complaint only on the following grounds:

1. The decision was contrary to the substantial weight of the evidence.
2. There is a substantial likelihood that newly discovered information, not available at the time evidence was presented to the Investigating Officer, would result in a different decision
3. Bias or prejudice on the part of the investigating Officer or
4. The punishment or the corrective action imposed is disproportionate to the offense

B. METHOD OF APPEAL

Appeals must be filed with the Dean within ten (10) days of receipt of the written determination of the outcome of the complaint. The appeal must be in writing and contain the following:

1. Name of the complainant
2. Name of the respondent
3. A statement of the determination of the complaint, including corrective action if any
4. A detailed statement of the basis for the appeal including the specific facts, circumstances, and argument in support of it, and
5. Requested action, if any.

The appellant may request a meeting with the Dean, but the decision to grant a meeting is within the Dean's discretion. However, if a meeting is granted, then the other party will be granted a similar opportunity.

C. RESOLUTION OF THE APPEAL

The College will resolve the appeal in a reasonably prompt manner. The decision of the Dean is final. The Dean shall issue a short and plain, written statement of the resolution of the appeal, including any changes made to the Investigating Officer's previous written determination and/or the sanctions and remedial measures imposed. The written statement shall be provided to the complainant, respondent, and the Title IX Coordinator within three (3) days of the resolution.

D. DOCUMENTATION

Throughout all stages of the investigation, resolution, and appeal, the Investigating Officer, the Title IX Coordinator, and the Dean as the case may be, are responsible for maintaining documentation of the investigation and appeal, including documentation of all proceedings conducted under these complaint resolution procedures, which may include written findings of fact, transcripts, and audio recordings.

E. INTERSECTION WITH OTHER PROCEDURES

These complaint resolution procedures are the exclusive means of resolving complaints alleging violations of the Title IX: Non-Discrimination and Anti-Harassment Policy. To the extent there are any inconsistencies between these complaint resolution procedures and other College grievance, complaint, or discipline procedures, these complaint resolution procedures will control the resolution of complaints alleging violations of the Title IX: Non-Discrimination and Anti-Harassment Policy.

Nothing in the College's Title IX Complaint Procedures, Title IX: Non-Discrimination and Anti-Harassment Policy, or associated materials should be interpreted so as to limit the

College's right to resolve, investigate, and/or take disciplinary action against any improper conduct of a sexual nature, including but not limited to Sexual Harassment, even though such conduct is not of the type, severity or pervasiveness that constitutes Sex Discrimination as defined in the Title IX: Non-Discrimination and Anti-Harassment Policy.

Definitions

A. Definition of Sex Discrimination

The College prohibits discrimination on the basis of sex ("Sex Discrimination") in all the College's programs and activities. In compliance with Title IX and its implementing regulations, the College has implemented this policy to eliminate, prevent and address conduct that constitutes Sex Discrimination. Conduct, such as Sexual Harassment, constitutes Sex Discrimination when it denies or limits a person's ability to participate in or benefit from the College's programs or activities based on sex. Sexual Harassment denies or limits a person's ability to participate in or benefit from the College's programs and activities, when:

1. Submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of any aspect of the College's programs and activities;
2. Submission to or rejection of such conduct by a person is used as a basis for any decision adversely affecting such person with respect to the College's programs and activities; or
3. Such conduct is severe or pervasive, such that, considering all relevant circumstances, the conduct denies or limits a person's ability to participate in the College's programs and activities.

Notwithstanding the aforementioned definition of Sex Discrimination, the College reserves the right to resolve, investigate, and/or take disciplinary action against any improper conduct of a sexual nature, including but not limited to Sexual Harassment, even though such conduct is not of the type, severity, or pervasiveness that constitutes Sex Discrimination under this policy.

B. Definition of Sexual Harassment

Sexual Harassment is any unwelcome conduct of a sexual nature. Sexual Harassment constitutes Sex Discrimination when it denies or limits a person's ability to participate in or benefit from the College's programs and activities. The College encourages members of the College Community to report any and all instances of Sexual Harassment, even if they are unsure whether the Sexual Harassment constitutes Sex Discrimination.

Sexual Harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal, physical, or visual conduct of a sexual nature, such as:

1. Pressure for a dating, romantic, or intimate relationship
2. Unwelcome touching, kissing, hugging, or massaging
3. Pressure for sexual activity
4. Unnecessary references to parts of the body
5. Sexual innuendos or sexual humor

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Further examples of Sexual Harassment may be found in the Frequently Asked Questions below.

C. Definition of Sexual Violence

Sexual Violence is a form of Sexual Harassment. Sexual Violence includes physical sexual acts perpetrated against a person's will or where a person is incapable of giving consent because of his or her temporary or permanent mental or physical incapacity or because of his or her youth. A single instance of Sexual Violence may be sufficiently severe to deny or limit a person's ability to participate in or benefit from the College's programs or activities, and, therefore, constitute Sex Discrimination.

Some examples of sexual violence include:

1. Rape or sexual assault: Sexual intercourse (anal, oral, or vaginal) by a man or woman upon a man or woman without consent
2. Unwilling sexual penetration (anal, vaginal, or oral) with any object or body part that is committed by force, threat, or intimidation
3. Sexual touching with an object or body part, by a man or woman upon a man or woman, without consent
4. Sexual touching with an object or body part, by a man or woman upon a man or woman, committed by force, threat, or intimidation
5. Prostituting another student
6. Non-consensual video or audio-taping of sexual activity
7. Knowingly transmitting a sexually transmitted disease to another

Further examples of Sexual Violence may be found in the Frequently Asked Questions below.

D. Definition of Consent

Lack of consent is a critical factor in determining whether Sexual Violence has occurred. Consent is informed, freely given, and mutually understood. Consent requires an affirmative act or statement by each participant. Consent is not passive.

1. If coercion, intimidation, threats, and/or physical force are used, there is no consent.
2. If a person is mentally or physically incapacitated or impaired by alcohol or drugs such that the person cannot understand the fact, nature, or extent of the sexual situation, there is no consent. Warning signs of when a person may be incapacitated due to drug and/or alcohol use include: slurred speech, falling down, passing out, and vomiting.
3. If a person is asleep or unconscious, there is no consent.
4. If a person is below the minimum age of consent in the applicable jurisdiction, there cannot be consent.
5. Consent to one form of sexual activity does not imply consent to other forms of sexual activity.

6. Consent can be withdrawn. A person who initially consents to sexual activity is deemed not to have consented to any sexual activity that occurs after he or she withdraws consent.
7. Being in a romantic relationship with someone does not imply consent to any form of sexual activity.
8. Effective consent may not exist when there is a disparity in power between the parties (e.g., faculty/student, supervisor/employee)

E. Definition of Sexual Misconduct

“Sexual Misconduct” is an umbrella term covering Sex Discrimination, Sexual Harassment, and Sexual Violence and this term will be used throughout the remainder of this policy and the Complaint Resolution Procedures when collectively referring to these types of conduct.

F. Definition of Domestic Violence, Dating Violence and Stalking

The crimes of Domestic Violence, Dating Violence and Stalking can also constitute sexual harassment when motivated by a person’s sex. These crimes, no matter the motivation behind them, are a violation of this policy.

1. “Domestic Violence” includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of a victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse or the victim under the domestic or family violence laws of the jurisdiction, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.

a. Utah’s definition of Domestic Violence can be found at Utah Code 77-36-1

2. “Dating Violence” means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on a consideration of the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.

a. Utah’s definition of Stalking can be found at Utah Code 78B-7-401

3. “Stalking” means engaging in a course of conduct directed at a specific person that would cause a reasonable person to (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

a. Utah’s definition of Stalking can be found at Utah Code 76-5-106.5

Responsibilities

ROLES AND RESPONSIBILITIES

A. Title IX Coordinator

It is the responsibility of the Title IX Coordinator to coordinate dissemination of information and education and training programs to:

1. assist members of the College community in understanding that Sexual Misconduct is prohibited by this policy;
2. ensure that investigators are trained to respond to and investigate complaints of Sexual Misconduct;
3. ensure that employees and students are aware of the procedures for reporting and addressing complaints of Sexual Misconduct; and
4. to implement the Title IX Complaint Resolution Procedures or to designate appropriate persons for implementing the Title IX Complaint Resolution Procedures.

B. Administrators, Deans, Department Chairs, and Other Managers

It is the responsibility of administrators, deans, department chairs, and other managers (i.e., those that formally supervise other employees) to:

1. Inform employees under their direction or supervision of this policy
2. Work with the Title IX Coordinator to implement education and training programs for employees and students
3. Implement any corrective actions that are imposed as a result of findings of a violation of this policy

C. All Employees

It is the responsibility of all employees to review this policy and comply with it.

D. Students

It is the responsibility of all students to review this policy and comply with it.

E. The College

When the College is aware that a member of the College Community may have been subjected to or affected by conduct that constitutes Sexual Misconduct, the College will take prompt action, including a review of the matter and, if necessary, an investigation and appropriate steps to stop and remedy the prohibited conduct. The College will act in accordance with its Title IX Complaint Resolution Procedures, described below.

Violations of the Policy

Students, faculty, and employees found to be in violation of this policy will be subject to discipline up to and including written reprimand, probation, suspension, demotion, termination, or expulsion. Affiliates and program participants may be removed from College programs and/or prevented from returning to campus. Remedial steps may also include counseling for the complainant, academic, work, transportation, or living accommodations for the complainant, separation of the parties, and training for the respondent and other persons.

Interpreting Authority

- Board of Trustees
- President
- Dean

In the event there is a conflict between interpreting authorities, the President will make the final interpretation decision.

Statutory or Regulatory References

1. “Domestic Violence” includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of a victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse or the victim under the domestic or family violence laws of the jurisdiction, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.

a. Utah’s definition of Domestic Violence can be found at Utah Code 77-36-1

2. “Dating Violence” means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on a consideration of the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.

a. Utah’s definition of Stalking can be found at Utah Code 78B-7-401

3. “Stalking” means engaging in a course of conduct directed at a specific person that would cause a reasonable person to (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

a. Utah’s definition of Stalking can be found at Utah Code 76-5-106.5

Relevant Links

www2.ed.gov/about/offices/list/ocr/complaintintro.html

<http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201104.pdf>

FREQUENTLY ASKED QUESTIONS

1. What kinds of conduct constitute prohibited Sex Discrimination?

All discrimination on the basis of sex in the College's programs and activities is prohibited under this policy. Sexual Harassment, defined as any unwelcome conduct of a sexual nature, is one way a person may discriminate against another due to his or her sex. The College has a duty under Title IX to take the steps outlined in this policy when conduct, like Sexual Harassment, denies or limits a person's ability to participate in or benefit from the College's programs and activities. In such circumstances, Sexual Harassment constitutes Sex Discrimination. The College encourages you to report any and all instances of Sexual Harassment, even if you are unsure whether the Sexual Harassment constitutes Sex Discrimination.

Sexual Violence is a particularly severe form of Sexual Harassment that includes physical sexual acts perpetrated against a person's will or where a person is for some reason incapable of giving consent. Even a single instance of Sexual Violence can constitute Sex Discrimination under this policy and should always be reported.

For further descriptions and examples of Sexual Harassment, Sexual Violence, and Sex Discrimination, please see Questions 2 and 4 below, as well as Section IV of the College's Title IX: Non-Discrimination and Anti-Harassment Policy.

2. What are some additional examples of Sexual Harassment?

Sexual Harassment is any unwelcome conduct of a sexual nature. Sexual Harassment constitutes a form of prohibited Sex Discrimination when it denies or limits a person's ability to participate in or benefit from the College's programs and activities. The College's policies protect men and women equally from Sexual Harassment, including harassment by members of the same sex. Staff, faculty, and students are protected from Sexual Harassment by any other staff, faculty, student, or contractor.

Examples of kinds of conduct that constitute Sexual Harassment include, but are not limited to, the following:

1. Engaging in unwelcome sexual advances
2. Leering or staring at someone in a sexual way, such as staring at a person's breasts or groin
3. Sending sexually explicit emails or text messages
4. Telling unwelcome, sexually-explicit jokes
5. Displaying sexually suggestive or lewd photographs, videos, or graffiti
6. Making unwelcome and unwanted physical contact, such as rubbing, touching, pinching, or patting
7. Making unwelcome and suggestive sounds, such as "cat calls" or whistling
8. Commenting on a person's dress in a sexual manner
9. Making sexual gestures

10. Repeatedly asking someone for a date after the person has expressed disinterest
11. Giving unwelcome personal gifts such as flowers, chocolates, or lingerie that suggest the desire for a romantic relationship
12. Telling another person of one's sexual fantasies, sexual preferences, or sexual activities
13. Commenting on a person's body, gender, sexual relationships, or sexual activities
14. Using sexually explicit profanity

3. What should I do if I have been subject to Sexual Misconduct?

The College encourages you to report Sexual Misconduct as soon as possible. Ignoring Sexual Misconduct does not make it go away. And delayed reporting may limit the College's ability to investigate and remedy the Sexual Misconduct.

If you are a student, you may report Sexual Misconduct to the Title IX Coordinator. If you are the victim of Sexual Misconduct that constitutes a crime, the College encourages you to also file a complaint with local law enforcement and to press charges. If requested, the College will assist you in filing a complaint with local law enforcement.

You always have the option to directly confront the person that is harassing you. Sometimes, individuals are not aware that their behavior is offensive and quickly apologize and change their behavior once it is brought to their attention. However, you are not required or expected to confront your harasser prior to filing a complaint.

4. What are some additional examples of Sexual Violence?

Sexual Violence is a form of prohibited Sexual Harassment. Sexual Violence includes physical sexual acts perpetrated against a person's will or where a person is incapable of giving consent due to use of drugs and/or alcohol or to an intellectual or other disability.

Examples of kinds of conduct that constitute Sexual Violence include, but are not limited to, the following:

1. The use of force or coercion to effect sexual intercourse or some other form of sexual contact with a person who has not given consent
2. Having sexual intercourse with a person who is unconscious because of drug or alcohol use
3. Hazing that involves penetrating a person's vagina or anus with an object
4. Use of the "date rape drug" to effect sexual intercourse or some other form of sexual contact with a person

5. One partner in a romantic relationship forcing the other to have sexual intercourse without the partner's consent
6. Exceeding the scope of consent by engaging in a different form of sexual activity than a person has consented to
7. Groping a person's breasts or groin on the dance floor or at a bar
8. Knowingly transmitting a sexually transmitted disease such as HIV to another person through sexual activity
9. Coercing someone into having sexual intercourse by threatening to expose their secrets
10. Secretly videotaping sexual activity where the other party has not consented

5. What constitutes “consent” for purposes of Sexual Violence?

Lack of consent is the critical factor in determining whether Sexual Violence has occurred. Consent is informed, freely given, and mutually understood. Consent requires an affirmative act or statement by each participant. Consent is not passive.

1. If coercion, intimidation, threats, and/or physical force are used, *there is no consent*.
2. If a person is mentally or physically incapacitated or impaired by alcohol or drugs such that the person cannot understand the fact, nature, or extent of the sexual situation, *there is no consent*.
3. If a person is asleep or unconscious, *there is no consent*.
4. Consent to one form of sexual activity does not imply consent to other forms of sexual activity.
5. Consent can be withdrawn. A person who initially consents to sexual activity is deemed not to have consented to any sexual activity that occurs after he or she withdraws consent.

6. What should I do if I am a victim of Sexual Violence, Domestic Violence, Dating Violence, or Stalking?

If you are the victim of Sexual Violence, Domestic Violence, Dating Violence, or Stalking, do not blame yourself. These crimes are never the victim's fault. Please contact the Title IX Coordinator as soon as possible for information on options and resources available to you. You may also wish to call local law enforcement (911 if an emergency), or the National Sexual Assault Hotline at 1-800-656-HOPE.

If you are the victim of Sexual Violence, Domestic Violence, or Dating Violence, do everything possible to preserve evidence by making certain that the crime scene is not disturbed. Preservation of evidence may be necessary for proof of the crime or in obtaining a protection order. Victims of Sexual Violence, Domestic Violence, or Dating Violence should not bathe, urinate, douche, brush teeth, or drink liquids until after they are examined and, if necessary, a rape examination is completed. Clothes should not be changed. When necessary, seek immediate medical attention at an area hospital and take a full change of clothing, including shoes, for use after a medical examination.

It is also important to take steps to preserve evidence in cases of Stalking, to the extent such evidence exists. In cases of Stalking, evidence is more likely to be in the form of letters, emails, text messages, etc. rather than evidence of physical contact and violence.

7. Can I make a complaint of Sexual Violence against my boyfriend or girlfriend?

Anyone can commit Sexual Violence, even if you and that person are in a romantic relationship. The critical factor is consent. If your boyfriend or girlfriend perpetrates a sexual act against you without your consent, such conduct constitutes Sexual Violence, and you may make a complaint. This type of conduct and other types of conduct perpetrated by your boyfriend or girlfriend may also be classified as Domestic Violence or Dating Violence.

8. What should I do if I am subject to Sexual Misconduct by someone who is not a College student or employee?

The College's policies protect you from Sexual Misconduct perpetrated by vendors, contractors, and other third parties that you encounter in your College learning, living, and employment environment. If you believe that you have been subject to Sexual Misconduct, you should make a report just as if it were committed by a College student or employee.

9. What should I do if I am subject to Sexual Misconduct by a student but we are off campus?

It is possible for off-campus conduct between College employees or students to contribute to a hostile working or academic environment or otherwise violate the College's policies. You may make a complaint of Sexual Misconduct even if the conduct occurs off-campus.

10. Should I contact the College if I have already notified the police about Sexual Violence?

Calling the local police or filing a police report is not the same as filing a complaint of Sexual Violence with the College. You should not assume that local law enforcement will forward your complaint to the College. As such, anyone who reports Sexual Violence to local police is also encouraged to report the matter to the College's Title IX Coordinator so that the College can begin to investigate the issue as quickly as possible.

11. What should I do if I observe Sexual Misconduct, but it is not directed at me?

Anyone who witnesses Sexual Misconduct, even if it is directed at someone else, can still feel uncomfortable and harassed. If you are a student and witness Sexual Misconduct please make a complaint in the same manner as if the conduct was directed against you. If you are an employee or staff member of the College, it is your duty to report Sexual Misconduct of any kind.

12. What is the role of the Title IX Coordinator?

The Title IX Coordinator oversees the College's compliance with Title IX and receives inquiries regarding Title IX, including complaints of Sexual Misconduct. The Title IX Coordinator has received special training on the College's policies and procedures pertaining to Sexual Misconduct, and is available to answer questions about those policies and procedures, respond to complaints, and assist you in identifying other resources to aid in your situation.

13. If I make a complaint of Sexual Misconduct, will it be treated confidentially?

The College will take reasonable and appropriate steps to preserve the confidentiality of the parties to the complaint and to protect the confidentiality of information gathered during the investigation. However, the College has an obligation to provide a safe and non-

discriminatory environment for all students and employees. Therefore, no unconditional promises of confidentiality can be provided. If your confidentiality cannot be guaranteed, the College will notify you.

14. Who is typically involved in investigating a complaint of Sexual Misconduct?

The College's Title IX Coordinator or his/her designee will be involved in investigating complaints of Sexual Misconduct. The Title IX Coordinator may appoint another member of the staff to investigate and resolve the complaint. The process of gathering evidence will necessarily require the involvement of the complainant, the respondent, and any witnesses to the incident that gave rise to the complaint. In sum, it will involve those persons necessary to fairly and completely investigate the complaint and resolve it.

15. What are the possible outcomes of an investigation into a complaint?

The outcome will be determined based on the totality of the evidence using a preponderance of the evidence standard. If the preponderance of the evidence does not support a finding that the incident occurred, then the complaint is resolved in favor of the accused. If, however, the preponderance of the evidence supports a finding that Sexual Misconduct occurred, the actions taken by the College will include those necessary to maintain an environment free from discrimination and to protect the safety and well-being of the complainant and other members of the College community. The College's actions will include reasonable steps to correct the effects of such conduct on the complainant and others and to prevent the recurrence of discrimination and retaliation. Examples of such action include: no-contact orders, classroom reassignment, the provision of counseling or other support services, training, and discipline for the perpetrator, including up to termination, expulsion, or other appropriate institutional sanctions. In addition, it is possible that an investigation may substantiate violations of College policies and standards, other than the Title IX: Non-Discrimination and Anti-Harassment Policy. If such other violations are identified, the College reserves the right to take immediate action to address them, irrespective of whether the investigation determines that Sexual Misconduct occurred.

16. May I have a support person with me in the investigation process?

During the investigation process, both a complainant and a respondent may ask a support person to accompany him or her at all stages of the process. In cases involving multiple complainants or respondents, the support person cannot be another complainant or respondent. The support person does not serve as an advocate on behalf of the complainant or respondent, may not be actively involved in any proceedings, and must agree to maintain the confidentiality of the process. A support person may be removed if he or she becomes disruptive or does not abide by the limitations discussed in the previous sentence.

17. What should I do if I am retaliated against for making a complaint of Sexual Misconduct?

The College's Title IX: Non-Discrimination and Anti-Harassment Policy prohibits retaliation against any person for making a good faith complaint of Sexual Misconduct, and/or cooperating in the investigation of (including testifying as a witness to) such a complaint. Retaliation is a serious violation that can subject the offender to sanctions independent of the merits of the underlying allegation of Sexual Misconduct. If you feel you are the victim of retaliation in violation of this policy, you should report the retaliation just as you would a complaint of Sexual Misconduct.

18. How does the College handle a bad faith allegation of Sexual Misconduct?

A bad faith allegation of Sexual Misconduct occurs when the accuser intentionally reports information or incidents that he or she knows to be untrue. Failure to prove a complaint of Sexual Misconduct is not equivalent to a bad faith allegation. The College may impose sanctions against an individual who knowingly makes false allegations of Sexual

Policy Adoption Review and Approval

Noorda College of Osteopathic Medicine

Course Director – Professionalism

Clinical Affairs

Reports To: Associate Dean for Clinical Affairs

Scope:

Impact:

Internal & External Constituents

Grade:

Dept Budget:

Job Status: Exempt

Direct Reports:

N/A

Job Code:

Purpose:

Under the direction of the Associate Dean for Clinical Affairs and in collaboration with the Associate Dean for Academic Affairs, upholds the integrity of Physical Diagnosis course content within the College of Osteopathic Medicine [COM] by ensuring students understand and adhere to the ethical, behavioral, interprofessional collaboration and social science principles that underpin the medical professionalism competency, demonstrating accountability to patients, society, and the profession; displaying high moral and ethical standards (medical education, training, research, and practice); demonstrating conduct that includes properly establishing, maintaining, and concluding the physician-patient relationship in a manner that is altruistic, compassionate, cultural aware and conscientious to the needs of patients, that supersedes self-interest, and is respectful of the patient as a person and demonstrates cultural sensitivity and responsiveness to a diverse patient population.

Accountabilities:

Under the direction of Clinical Affairs and in collaboration with Academic Affairs:

1. Upholds the integrity of the assigned COM course curriculum.

1.1. Oversees implementation and execution of assigned course as directed (reviewing objectives and syllabi, soliciting input/ideas, presenting recommendations, etc.).

1.2. Ensures essential course elements (quality, integrity, adequacy, consistency, student use/results/impact, etc.) adhere to and exceed those as defined by academic blueprints (identifying and presenting opportunities to build and enhance the educational experience, implementing modifications to ensure commitment to excellence and high quality outcomes, providing constructive feedback, etc.).

1.3. Meets established time lines for submission, and ensures that course materials are accurately prepared (syllabus, learning objectives, course materials, section study guides, quizzes, exams, etc.). In collaboration with Academic Affairs, secures questions from both on- and off-campus lecturers and facilitates question reviews with Academic Affairs and lecturers for final approval of content and assessment.

2. Primary responsibility for the student's professionalism skills.

- 2.1. Guides students' knowledge of the behavioral and social sciences that provide the foundation for the professionalism competency (moral, legal) including medical ethics (autonomy, beneficence, nonmaleficence, fidelity, justice, and utility), social accountability (cultural awareness, social determinants of health, economic situation, inequalities in health care) and responsibility (capacity for self-care, ability to participate in shared decision making).
 - 2.2. Leads student development, performance and maintenance of clinically appropriate humanistic behaviors (respect, altruism, compassion, integrity, honesty, and trustworthiness) recognizing the patient's autonomy, dignity, and privacy in action, deeds and words (openness, honesty) with patients and their families to include the completion of all reports (medical records, formal inquiries, litigation, etc.).
 - 2.3. Establishes standards engendering accountability and duty in properly establishing, maintaining, and concluding the physician-patient relationship (examining, diagnosing, and treating), in accordance with proper ethical and legal standards (consensual, conscientiously) and take appropriate action to protect patients from risk from unprofessional behaviors that compromises patient care or represents a threat to patients or others (impairment, substance abuse, incompetence, unethical conduct, inappropriate behaviors, etc.).
 - 2.4. Provides guidance in students demonstrating reason, appropriate judgment, responsiveness that supersedes self-interest in the incorporation of the patient's perspective in decisions about care (diagnostic, treatment modalities, etc.) even those considered futile, taking into consideration patient's risks and needs (health, income, job security, etc.) while respecting patient autonomy and rights (personal privacy, dignity, full disclosure, etc.).
 - 2.5. Prepares students to demonstrate knowledge of and ethically apply principles in the practice of clinical care (interprofessional collaboration, confidentiality of patient information, access, regulation, provision or withholding), minimizing needless helplessness or suffering (physical, emotional, and spiritual pain).
 - 2.6. Develops students aptitude in cultural competency (sensitivity, respect, responsiveness) to a diverse and heterogeneous patient population (cultural heritage, religion, age, gender, sexual orientation, socioeconomic circumstances, mental and physical disabilities, military personnel) discuss cultural issues openly and be responsive to culturally based cues, and to include patient support system (family, caregivers, members of the health care team).
- 3. Manages student relationships, ensuring academic achievement.**

 - 3.1. Serves as an effective leader/mentor for students (maintaining close communication, assuring students are met with regularly, developing related presentations, presenting course reports, etc.).
 - 3.2. Presents policies and protocols as relates to course to students (communicating regularly with students identifying topics and issues of importance, soliciting feedback and evaluations, making recommendations to University leadership, etc.).
 - 4. Serves as an educator ensuring the quality, integrity, and defined standards within faculty's discipline.**

- 4.1. Develops and delivers course content (quality, integrity, adequacy, consistency, student use/results/impact etc.) and adheres to and exceeds, as defined by the relevant governing body accreditation, requirements and the College's mission (identifying opportunities to build and enhance the educational experience, providing constructive feedback, documenting findings, etc.).
 - 4.2. Maintains content expertise within discipline and contributes to the curricular model (sequential progression, elimination of redundancies, Bloom's taxonomy) and delivery modalities of coursework for which the unit is responsible, and recommends changes when appropriate.
 - 4.3. Ensures teaching is current, appropriate and inter-related, and where applicable, supports and builds upon previous learning experience and content (integrating emerging knowledge with practical longitudinal clinical experience, aligning learning objectives and processes), increasing student understanding of subject matter.
 - 4.4. Works effectively as a team member to enhance and improve curricula, including potential opportunities for collaborative efforts within the department or with outside individuals, programs, or departments; maintains a climate hospitable to creativity and innovation.
 - 4.5. Develops and maintains a working knowledge of various teaching and assessment approaches (small group, bedside teaching, mentoring, lecture, independent practice-based learning, evidenced based medicine approach, simulation including institutional simulation, online learning and interactive video scenario, standardized patient, etc.).
- 5. Contributes to team effort by performing other duties as needed/assigned.**

Qualifications:

Education: Doctoral degree in a health-related profession or education.

Experience: Minimum of 5 years' experience as a healthcare provider, minimum of 3 years of educating health professional students. Demonstrated leadership and proven record of establishing successful collaboration.

Skills & Abilities: Highly professional with honest, genuine, direct communication style, excellent interpersonal skills and emotional maturity with the essential ability to demonstrate tact, discretion and job diplomacy. Ability to institute a comfortable learning environment necessary to maintain a dynamic curriculum with a vision for growth. Must have the ability to work diplomatically and effectively with a variety of internal and external constituents. Proven track record of quality, integrity and trustworthiness. Ability to make common sense, consistent and fair decisions (based on facts and data), and have courage of convictions and tolerance for ambiguity.

Must be:

- Able to institute a comfortable learning environment necessary to maintain a dynamic curriculum.
- Self-confident, strong leader, skilled decision-maker with ability to lead by influence and effectively communicate with various constituencies across the college
- In possession of exceptional written, oral presentation and listening skills
- Able to work independently yet as an effective participant in cross-functional teams
- Self-motivated, self-disciplined, with a strong work ethic and capable of establishing priorities in an executive setting
- Flexible and able to adapt to changing priorities and effectively able to handle frequent interruptions
- Innovative, resourceful, detailed oriented, with excellent follow through skills
- Capable of balancing multiple projects in stressful situations while meeting deadlines, achieving desired results, and maintaining positive relations with understanding of the importance of confidentiality of data and information



NOORDA COLLEGE

of OSTEOPATHIC MEDICINE

Department of Clinical Education

About the Clinical Education Guidelines

The Clinical Education Guidelines provide students with important information about policies, procedures, requirements, and services. Students are required to read, understand, and adhere to the Clinical Education Guidelines.

An updated version of the Clinical Education Guidelines is published each academic year. The yearly update (and any subsequent updates during the academic year) supersedes all prior editions and provides the latest rules, policies, and procedures to create the most up-to-date student reference. Noorda-COM reserves the right to amend, modify, add, or delete information within the Clinical Education Guidelines at any time without advance notice. Students will be notified of any revisions.

Please contact Department of Clinical Education for questions or to submit an update.

Mission Statement

To empower our students with the essential personal and professional skills needed to be competent, confident and compassionate osteopathic physicians dedicated to meeting the healthcare challenges of the communities in which they serve.

Vision Statement

The College of Osteopathic Medicine is recognized as a leader in osteopathic medical education through innovative, progressive curricular offerings.

Values Statement

Instilling values that foster cultural awareness, ethical leadership, embraces diversity and inspires a servant's heart towards caring for the poor and needy.

Pages 13 – 17

CLERKSHIP POLICIES & PROCEDURES

Professional Conduct

Students are expected to present and conduct themselves in a professional manner at all times. Noorda-COM's expectations include, but are not limited to:

- Adherence to all policies, procedures, professional behavior, and attitude
- Exemplary interpersonal relationships with peers, faculty, staff, and the general public

- The ability to work effectively as part of the academic community and/or health care team
- Communication

The Department of Clinical Education's primary means of communication is Noorda-COM email.

Student responsibilities include:

- Using Noorda-COM Email Account for all Noorda-COM related correspondence
 - use of Personal Email Accounts on behalf of their Noorda-COM Email Account is not permitted
- Checking e-mail and spam folder daily – read and respond
 - Respond to Department of Clinical Education correspondence within 48 hours of receipt
 - Recurrent issues may lead to referral to an appropriate College official
- Being aware of all information disseminated by the College
- Complying with all College policies
- Keeping contact information, including mailing address, cell phone, and emergency contact numbers updated in Noorda-COM Canvas
- Students who experience problems with e-mail should directly contact the Information Technology (IT) Helpdesk
- Students who experience problems with Noorda-COM Canvas should directly contact the appropriate Coordinator or e-mail XXXXXX@Noorda-COM.edu
- Complying with privacy policies such as the Family Educational Rights and Privacy Act (FERPA), HIPAA, etc.

Absence from Clerkships

Attendance at all clerkship related activities is mandatory; therefore, any absence requires an excuse and documentation.

Failure to notify both the Department of Clinical Education and/or the clerkship site/preceptor of any absence from a clerkship, regardless of the reason or number of hours absent, may result in a meeting with the Assistant Dean of Clinical Education regarding lack of professionalism and could result in a failing grade of the clerkship. Students may not miss the first day of any clerkship.

An Absence Request Form and supporting documentation must be submitted directly to the Coordinator. All submitted absence forms must include a detailed make-up plan in order for the absence to be considered.

Only completed, signed forms are processed. Decisions rendered through this process are final. There are no exceptions to this policy and failure to follow the process will be considered an unexcused absence. The Coordinator notifies the student via email when a decision has been reached. The Absence Request Forms can be found in the forms section of the intranet page.

Scheduled absences are not and should not be considered approved until the official Absence Request Form is signed by the Assistant Dean of Clinical Education.

Absence Request Forms must be completed and submitted to the Coordinator for all of the following:

- COMLEX-USA Level 2 PE Exam Absences:
 - Students are allowed 1 day for travel to the exam, the test day, and an additional day for return travel. Requests are submitted electronically via an Absence Request Form to the corresponding Coordinator.
- Discretionary Days:
 - Students are allowed two (2) discretionary days during OMS-III. Discretionary days MUST be approved by both the preceptor and Department of Clinical Education in writing in advance to the requested time off. Requests are submitted electronically via an Absence Request Form to the corresponding Coordinator.
- Sick Days:
 - Students will be allowed two (2) sick days annually. If more than two (2) sick days total are taken by a student, this may result in referral to the Assistant Dean of Clinical Education.
 - Students must contact their clinical site/preceptor as well as the site coordinator and the Coordinator immediately if they are missing any clinical time due to illness (leaving early, arriving late, or missing a full day).
 - If two-four (2-4) hours of clinic time is missed, a half day will be documented. More than 4 hours of missed clinic time = a full day of sick leave.
 - If an absence of greater than one working day is necessary due to illness, that time must be made up.
 - Arrangements for missed time will be coordinated with their clinical site/preceptor as well as the site coordinator, and/or the Coordinator.
 - If the student is absent from a single clerkship for two (2) or more days due to illness, the student is required to submit to the Department of Clinical Education a note from a licensed healthcare provider defining the number of days absent and the expected date of return.

Family Emergencies/Death in Family:

Due to the variability of circumstances, time off needed for family emergencies or death of a family member will be reviewed by the Assistant Dean for Clinical Education on a case-by-case basis.

Flex-Time:

Flex-Time is defined as the time during the OMS-IV year when a student is not on clerkship (clinical clerkship). Often, Flex-Time is used to fill in the gap between the end date of one clerkship and the start date of the next clerkship. Flex-Time can also be

used for a variety of other purposes such as non-credit academic study, attending educational seminars/ conferences, educational presentations such as posters or research, etc. Flex-Time may NOT be used to take additional clinical clerkships.

Each OMS-IV is allotted twenty-five (25) weekdays of flex-time during their 4th year clerkships. Students may combine no more than two (2) consecutive weeks of Flex-Time.

Students wishing to schedule Flex-Time must submit an Absence Request Form to their Coordinator. DME/Preceptor signatures are not required on Absence Request Form if using Flex-Time. If approved, Flex-Time will be entered into the student's schedule by their Coordinator.

Flex-Time expires after March 31st. Students must be continuously enrolled through the last business day of April.

The following may result in loss of Flex-Time privileges—failure to:

- Communicate with Coordinator
- Enter clerkships into Noorda-COM Canvas 90 days in advanced followed by full preceptor information within two weeks of the start of clerkship
- Comply with requests for information from the Coordinator
- Submit required documentation in a timely manner

Time off for Residency Interviews:

Students requiring time away from clerkships for interviewing will be allowed ten (10) days during interview season, which extends from August 1, 2018 to January 31, 2019 of the 4th year. Flex-Time days may also be used to help accomplish residency interviews.

- Students may not be absent the first day of a clerkship, even if it is for a residency interview
- Students may request no more than four (4) days off for interviewing during any four-week clerkship, and no more than two (2) days over any two-week clerkship. This includes partial day absences of greater than four (4) hours. Students will be required to formulate and submit a makeup plan.
- All requests for time off must include a completed Absence Request Form and supporting documentation submitted directly to the Coordinator. Written verification of the interview location and date, must be provided to the Department of Clinical Education with the Absence Request Form. Permission for an absence must be cleared in advance with the following:
 - Noorda-COM Department of Clinical Education, and
 - Clinical Site/Preceptor to whom the student is assigned

Leaves of Absence

A leave of absence, from the College, may be granted for several reasons. Examples:

- Medical emergency or illness
- Personal emergency

- Military service
- Maternity/ Paternity leave

Associate Dean for Student Affairs may grant a leave of absence for a designated period of time with or without conditions. Conditions are commonly prescribed in cases of academic deficiency or medical related issues.

Students granted a medical leave of absence must have a licensed physician, selected by the Associate Dean for Student Affairs, certify in writing that their physical and/or mental health is sufficient to continue in a rigorous educational program before they may return to the College.

All leaves of absence should be requested in writing to the Associate Dean for Student Affairs, who is responsible for approving or denying requests for leaves of absence.

Students granted a leave of absence must follow the checkout process detailed in the College Catalog under Leaves of Absence.

Students approved for a leave of absence will retain their Noorda-COM email account and have access to enCOMpass, but all other access to electronic services will be suspended until such a time that the student is officially reinstated to active status.

All changes to a student's schedule must be communicated to their Coordinator.

Refer to the most current Academic Catalog and Student Handbook for additional information.

Reporting Clerkship Problems

At times, concerns/issues may arise during a clerkship. General concerns should be addressed directly to the preceptor, core site coordinator, DME/ DIO or Noorda-COM Regional Assistant Dean (RAD), when appropriate. The utmost degree of professionalism is encouraged when discussing these concerns. If an effective resolution cannot be reached, or if the student is not comfortable addressing the issue themselves, the student should contact their Noorda-COM Clinical Clerkship Coordinator.

Immediate concerns (harassment, student and patient safety, etc.) should be reported directly to the Department of Clinical Education.

Dress Code for Clinical Activities

On clinical clerkships, students must wear professional attire. White coats are required. Male students should wear collared shirts with ties. Female students should wear dresses or slacks/skirts with dress shirts. Closed-toed shoes are required.

Training sites may designate other prescribed clothing such as scrubs and/or comfortable shoes. Students may be asked to change their appearance to conform to the dress code of preceptors as well as clerkship sites. A professional appearance mandates the conservative use of jewelry, hair color and clothing selection. Any

clothing, hair color, jewelry or body piercing that may cause a concern with affiliated faculty, hospitals, or patients must be covered or avoided.

Student Identification

While performing duties related to patient care, all students must clearly identify themselves as Osteopathic Medical Students both verbally and by wearing their Noorda-COM picture identification badge in addition to any hospital issued identification. Misrepresentation of oneself as a licensed physician is illegal, unethical and subject to disciplinary action. Student identification badges should be worn above the waist and made clearly viewable at all times.

The AOA recommends all Noorda-COM medical students refer to themselves as "Osteopathic Medical Students" (OMS) followed by the academic level in Roman numeral form. Students should use this title when completing written communication such as email, letters, and/or official social media communication. Students should make every effort to follow the recommendation of the AOA. Communication should look like the following: OMS-I, OMS-II, OMS-III, OMS-IV.

Should the Noorda-COM identification badge become lost or broken, the student should contact Noorda-COM Security at XXX-XXX-XXXX immediately to order a replacement.

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SAFETY & COMPLIANCE

In Case of Emergency

Students should follow emergency procedures and protocols at their specific clinical site at all times. In the event that your clerkship schedule is interrupted due to hazardous weather conditions or another emergency situation, please notify the Department of Clinical Education as soon as possible.

In the case of inclement weather, students on clerkships do not follow the same attendance requirement as year 1 and 2 medical students. Students on clinical clerkships are to follow the schedule of the site where they are rotating. If the site is closing due to inclement weather, then the student is excused until the site re-opens. If the student is at a hospital or site where they are not closing, the student is to report and remain on-service until the end of their shift. Students should use caution and allow themselves plenty of time to get to their destination.

In the case of an emergent situation outside normal business hours that requires you to evacuate your location, relocate for a period of time, or any other emergency, please contact the Noorda-COM Campus Security office at XXX-XXX-XXXX.

Pages 33- 46

Title IX Training – Non-Discrimination and Anti-Harassment

All students should be able to study in an atmosphere free of harassment, sexual violence and gender discrimination. Title IX makes it clear that violence and harassment based on sex and gender is a Civil Rights offense subject to the same kinds of accountability and the same kinds of support applied to offenses against other protected categories such as race, national origin, etc.

You are required to complete this training yearly while enrolled as a student at Noorda-COM.

The College has designated the following Title IX Coordinator to coordinate its compliance with Title IX and to receive inquiries regarding Title IX, including complaints of sex discrimination: XXXXXXXX

Additional information on Title IX can be found [here](#).

Social Media

Do not post any information regarding your clerkship, patient information or issues with your site on any form of social media. This violates HIPAA regulations and is unprofessional. Your private social media is not really private. Although the patient identifiers may not be present in the post, details of the case such as date, time and location, may allow the reader to identify the individual. Patients place their trust in you to care for them with their privacy assured. It is not your right to discuss or reveal details of a private medical procedure in a public forum. Disciplinary action for such an offense will not only affect graduation, but the ability to obtain a license to practice medicine.

Hospital Rules and Regulations / Financial Responsibilities

Each hospital/health care system has individual rules and regulations. Medical students must familiarize themselves with and adhere to these protocols during training. Students must respect and follow all policies regarding the use of hospital facilities, housing, and equipment.

Students are financially responsible for any damage to or loss of hospital or training site-related property, including but not limited to library materials, pagers and keys. Final grades may be withheld pending return of all hospital or training site property.

HIPAA Regulations and Patient Encounters

All students are required to become familiar with and adhere to all aspects of the Health Insurance Portability and Accountability Act (HIPAA) of 1996, Public Law 104-191 including The Privacy Rule published by the US Department of Health and Human Services (HHS). The Privacy Rule establishes, for the first time, a foundation of Federal protections for the privacy of Protected Health Information (PHI). This rule sets national standards for the protection of health information, as applied to the three types of covered entities: health plans, health care clearinghouses, and health care providers who conduct certain health care transactions electronically.

By the compliance date of April 14, 2003 (April 14, 2004, for small health plans), covered entities must implement standards to protect and guard against the misuse of

individually identifiable health information. More specific information may be obtained at www.hhs.gov/ocr/hipaa/

As a medical student, these standards pertain to all individually identifiable health information (Protected Health Information or PHI) encountered during medical training with the College including, but not limited to, medical records and any patient information obtained.

HIPAA regulations prohibit the use or disclosure of PHI unless permitted or required by law therefore, each student must utilize reasonable safeguards to protect any information he or she receives. Each student is responsible for ensuring the safety and security of any written or electronic information he or she receives, creates or maintains. The misplacement, abandonment or loss of any information in the student's possession will result in disciplinary action. At no time should a medical student alter, remove or otherwise tamper with medical records.

Specific rules and regulations with respect to student entries in medical records must be clarified during orientation or on the first day of the clerkship.

Furthermore, each student is responsible for ensuring that PHI is used or disclosed only to those persons or entities that are authorized to have such information. Students are expected to maintain strict confidentiality in their patient encounters; to protect the physician-patient privilege; and to ensure that there are no unauthorized uses or disclosures of PHI.

Any unauthorized use or disclosure of PHI, to include but not limited to digital images, video recordings, or any other patient related materials, committed by a student, or any observation of the same by a student or employee, should immediately be reported to Clinical Education.

HIPAA & OSHA Training

To be completed before beginning 3rd year and AGAIN prior to beginning 4th year

1. Go to XXXXXX.org
2. Log in with the Username/ Password you registered with previously
3. Click on “Add a Course” under “My Learner Tools for Noorda-COM” and select the following:
 - Question # 1: Choose “Data or Specimens Only”
 - Question # 2: Choose “Data or Specimens Only”
 - Question # 3: Leave Blank
 - Question # 4: Choose “Health Information Privacy and security (HIPS) Course – Information for Clinicians”
 - Questions# 5: Choose: “OSHA Bloodborne Pathogens”
 - Question# 6: Choose “Not at this time”
 - Question # 7: Choose “No”.
 - Question # 8: Choose “Not at this time”

- Question# 9: Choose “Not at this time”
 - Click” Submit”
4. You should now have the courses you need to complete listed under “Main Menu” page
 5. CITI Program will issue a completion certificate when you complete and pass the course. An automatic email will be received by the Office of Research.
 6. For any questions about CITI Training Program, please contact the Research Compliance Office at XXX-XXX-XXXX or XXXX@NoordaCOM.org

Clinical Facility Student Requirements

Education Affiliation Agreement

A Student’s must have a current affiliation contract with Hospital. Contracts are verified through the Clinical Education. Contracts are between the hospital and a Noorda-COM and do not create any third party rights or benefits in the Students.

Verification & Documentation

In a patient care environment, the student must have verification or documentation of the following items:

Identification Badge

A Noorda-COM and Hospital name badge must be worn in a visible location on the upper torso area at all times while at work. ID badges are to be free of pins, stickers, or any other material that might interfere with the viability of the photo or the identification of the person wearing the badge.

The Hospital region/facility student placement coordinator approves and coordinates student hospital badging.

- The ID badge may be utilized in all Hospital sites of service during a semester rotation.
- The ID badge must be worn at all times when on-site at an Hospital facility.
- At the end of the semester/year, the hospital ID badge must be returned to the hospital student coordinator.

Student Role / Responsibility

The student will:

- Adhere to general rules, policies, and regulations of the Hospital facility.
- Act professionally and refrain from making comments, gestures, or acting in any manner which can be construed as harassment.
- Work within appropriate level of education, seeking direction and validation from the Hospital preceptor/supervisor or his/her instructor. If the student is not able to competently perform the skills assigned, he/she must inform his/her preceptor/supervisor.

- Utilize the materials and/or orientations provided to become knowledgeable of facility safety procedures.
 - Know how to handle emergencies, hazardous materials contact, or disasters;
 - Know of and follow facility security, safety, and infection control procedures;
 - Maintain current BLS certified if providing direct patient care.

Professional Image

Personal Appearance

- Students are expected to manage personal hygiene habits to control cleanliness and avoid offensive body odors. Strong perfume, cologne or lotions that might interfere with those who are ill or allergic to such odors or fragrances should not be used.
- Cosmetics should be moderate.
- Hair must be well-groomed and neat. Hairstyles and color should not be extreme. Extreme styles which may distract from providing exceptional care should be avoided. Hair should not make contact with patients or guests.
- Beards and mustaches are to be neatly trimmed.
- Fingernails should be short to moderate length and clean. Students cannot wear artificial nails, nail wraps and nail jewelry. Gel and shellac nail polish is not allowed. Regular nail polish is permitted but must be chip free. Students assigned to surgical areas are prohibited from wearing any type of fingernail polish.
- Department managers may ask students to cover tattoos while on duty if the tattoos are deemed to be unprofessional or distracting.

Jewelry

- Jewelry must not create a safety hazard or interfere with work assignments.
- Visible body piercing is not permitted except for ear piercing. A maximum of two conservative earrings per ear are permitted. Ear gauges must be small and neutral in color.
- Extreme piercing or body modifications are not permitted (e.g., tongue piercing, split tongues, extreme earlobe spacers, skin disfiguring implants, etc.).

Clothing Appearance

- Clothing should be modest, clean, pressed, and in good repair, without holes, rips or tears. Immodest or cut off clothes are not permitted (e.g., shorts, mini-skirts, bare midriffs, tank tops, tube tops, halter tops, spaghetti straps, etc.).
- Students are to wear clothing that is appropriate to their work setting; however, they are not obligated to wear standard employee uniforms (e.g., specific scrub color related to work assignment).
- Unacceptable clothing and footwear:

- Jeans, cargo pants, mini-skirts, baseball hats, non-dress T-shirts (no silk screens, no logos, collars preferred), sweat pants/shirts/hoodies, athletic or track clothing, tight or revealing clothing.
- Beach-type footwear (made from foam, rubber, or similar material suitable for recreational, e.g., flip-flops, Velcro sandals, etc.), outdoor footwear such as hiking boots or water shoes.

Patient Rights & Responsibilities

Hospital outlines the rights afforded to each person who is a patient in our facilities. This Patient Rights and Responsibilities document discloses Hospital's commitment to an environment of trust where patients can feel comfortable and confident with the care they receive.

The Patient's Rights Policy has been adopted to promote quality care with satisfaction for the patient, the family, the physician, and the staff, regardless of age, color, creed, marital status, medical condition, national or ethnic origin, race, religion, cultural heritage, gender, sexual orientation, gender identity, political affiliation, disability, genetic information, amnesty, or status as a covered veteran in accordance with applicable federal, state and local laws or any other individual personal attribute.

Some areas within Hospital have slightly modified versions of the rights and responsibilities that are more specific to their patients, residents, or members. Questions regarding these modified versions may be directed to the department director or the facility compliance coordinator.

Cultural Diversity & Sensitivity

What is Culture?

Culture is the values, beliefs and practices shared by a group of people. Hospital has an obligation to be respectful and sensitive to another's belief system.

Cultural Competency

Students should try to acquire basic knowledge of the patient's and family member's cultural values, beliefs and practices:

- Ask questions
- Listen
- Account for language issues
- Be aware of communication styles
- Be sensitive to personal health beliefs and practices
- Students should ask their supervisor/preceptor to help with the following questions:
 - How does the patient stay healthy?
 - Special foods, drinks, objects or clothes
 - Avoidance of certain foods, people or places
 - Customary rituals or people used to treat the illness
 - What are the expectations for medicine usage?

- Past experiences with medicine usage
- Will the patient take medicine even when he/she doesn't feel sick?
- Is the patient taking other medicines or anything else to help them feel well?
- Family and community relationships
 - Are illnesses treated at home or by a community member?
 - Who in the family makes decisions about healthcare?
- Language barriers
 - Can the patient understand limited English?
 - What, if any, is the patient's literacy level?
 - If necessary, use visual aids and demonstrate procedures
 - Check understanding
 - Is an interpreter necessary? If yes, follow Hospital guidelines by using a trained medical interpreter.
- Avoid using family members
- Body language. Is there cultural significance for:
 - Eye contact
 - Touching
 - Personal space
 - Privacy / modesty
- Religious / Spiritual beliefs. Are there sensitivities / beliefs associated with:
 - Birth and/or death
 - Certain treatments, blood products
 - Prayer, medication and worship
 - Food preparation, clothing, special objects, and gender practices
- Other cultural factors to consider
 - Gender
 - Wealth or social status
 - Presence of a disability
 - Sexual orientation

EMTALA

The Emergency Medical Treatment and Labor Act is a federal law that requires hospitals to treat all people who request emergency care.

- Students should not act independent of their assigned Hospital preceptor/ supervisor.
 - Provide assistance to all people (adults and children) needing emergency care.
 - If help is required to transport the person, call the hospital operator. State the problem and the location. Request Security to help transport the patient.
 - Initiate a Code Blue, if appropriate.
 - Never direct a person seeking emergency care to go to another hospital or facility if a patient requiring treatment for an emergency medical condition refuses to stay at the hospital.

Student Health

Infection Prevention and Control

The purpose of an infection prevention and control program is to prevent the transmission of infections within a healthcare facility. Students can protect themselves and patients by adhering to basic infection prevention and control principles. Standard precaution procedures should be used routinely when caring for patients, regardless of their diagnosis.

Standard Precautions

Standard Precautions is the name of the isolation system used within Hospital, and is used for every patient, regardless of diagnosis. The aim is to minimize risk of exposure to blood or body fluids. To accomplish this, personal protective equipment (PPE) (i.e. gloves, gowns, masks, and goggles) is used for potential contact with body fluids from any patient.

Standard Precautions include these principles:

- Hand Hygiene: Wash hands with soap and water or sanitize with an alcohol-based hand rub before and after each patient contact, and after removing gloves. See Hand Hygiene Policy.
- Gloves: Use when touching any body fluids or non-intact skin.
- Gowns: Wear if splashing or splattering of clothing is likely.
- Masks and goggles: Wear if aerosolization or splattering is likely.
- Needles: Activate sharps safety devices if applicable, then discard uncapped needle/syringe and other sharps in containers provided for this purpose. Use safety products provided.
- Patient Specimens: Consider all specimens, including blood, as bio-hazardous.
- Blood Spills: Clean up with disposable materials (i.e., paper towels or spill kit), clean and disinfect the area. Notify Housekeeping for thorough cleaning.

Droplet Precautions

Droplet Precautions are used when patients have a disease process that is spread by contact with respiratory secretions. These include: Respiratory infections (RSV, Human Metapneumovirus, Parainfluenza, Influenza),

Neisseria meningitidis (meningitis or sepsis), Invasive Haemophilus Influenza type B (meningitis, sepsis, epiglottises), Diphtheria, Pneumonic Plague, Mumps, Parvovirus B19, Rubella.

Droplet Precautions include:

- Private Room: One patient per room, or patients with similar diagnosis. The patient is confined to the room until directed by Infection Prevention and Control.
- Mask and Gloves: Worn by all hospital personnel upon entering the room.
- Gown: To be worn if there is a possibility of contact with bodily fluids.

- Hand Hygiene: Wash or sanitize hands upon entering patient room, removing gloves, and when leaving the patient room.

Contact Isolation

Contact isolation is used when patients have a disease process that is spread by contact with wounds or body fluids. These include: Diarrhea (Rotavirus, Clostridium difficile, E. Coli 0157:H7, Shigella, Salmonella, Hepatitis A, Campylobacter, Yersinia.), open draining wounds, infection or colonization with multi-drug resistant organisms (MDROs)

Contact Precautions include:

- Private room: Private room or rooms with a patient who has a similar diagnosis. Patients who are un-diapered and incontinent of stool should be confined to the room.
- Gloves: All hospital personnel wear gloves when entering the room.
- Gown: To be worn if clothing will have contact with patient or objects in the room.
- Hand Hygiene: Wash or sanitize your hands upon entering patient room, removing gloves, and when leaving the patient room.
- NOTE: For patients with Clostridium Difficile (C-Diff), do not use a hand sanitizer or other products which contain alcohol. Use soap and water only.

Airborne Precautions

Airborne precautions are used when the infection is spread through the air. Examples of diseases requiring airborne precautions are:

- TB (tuberculosis)
- Measles
- Chickenpox

Precautions include:

- Patients are placed in a private negative pressure room. Keep door closed except to enter and exit.
- Wear an N-95 respirator mask, which requires a fit test, or a Powered Air Purifying Respirator (PAPR) when entering the room. Students will not be assigned these patients.
- Use proper hand hygiene. Wash or sanitize hands upon entering patient room, removing gloves, and when leaving the patient room.

Personal Protective Equipment (PPE)

Wear personal protective equipment when there is potential for handling or coming in contact with bodily secretions or fluids. PPE should be located in areas where such exposures are likely to occur.

Students can ask questions or request additional information from their Hospital preceptor/supervisor.

Needle Stick Policy/Exposure to Blood and Body Fluids

Policy/Procedure:

If a Noorda-COM medical student is exposed to bloodborne pathogens either by direct contact with blood or other body fluids via the eyes, mucous membranes, human bite, or sharps (e.g., needle stick, lancet stick, scalpel cut, etc.) while on clerkship, it is to be handled as an EMERGENCY SITUATION.

In the event of an exposure students are to follow site procedures.

Clean

Immediately wash region with soap and water for 5 minutes. If exposure occurred in the eyes, nose, or mouth, use copious amounts of water to irrigate mucus membranes. Know where stations to irrigate eyes are located.

Communicate

Let the preceptor, DME/DIO, Core Site Coordinator and the Department of Clinical Education know about the exposure ASAP. Student should ask for the following information:

- Patient information (name, DOB, medical record number, address, phone #) and any prior testing for HIV, Hep B, Hep C, RPR, or risk factors thereof
- If patient is known to be HIV +, obtain info on CD4 count, history/current opportunistic infections, prior/current regimen/resistance
- Baseline labs for student and patient (HIV, Hepatitis B, Hepatitis C)
 - If he/she is not able to do lab work, present to the closest ER

Chemoprophylaxis

If the patient is HIV +, or their HIV status is unknown, begin post exposure prophylaxis with a multidrug regimen within a few hours of the exposure – do not delay in seeking care. If unable to obtain an Rx for meds from the preceptor, go to the nearest ER for a prescription.

Visit <http://nccc.ucsf.edu/clinical-resources/pep-resources/pep-guidelines/> for more information and the current guidelines.

Post Exposure Protocol

- Immediately wash exposed areas with soap and water.
- If splashed in eyes or mouth, flush with large amounts of water.
- It is critical that you are treated within the first two hours after injury.
- Notify supervisor and follow clerkship site exposure protocols.
- If facility is not equipped to handle exposure, contact an Occupational Health Clinic, appropriate site location, or go to the nearest emergency department with your current health insurance information.
- Notify the Department of Clinical Education of any care received.

Counseling

Students exposed to a blood borne pathogen will receive counseling and instructions for follow-up from the Department of Clinical Education. Please contact them within 24 hours. xxxxx@NoordaCOM.org

Privacy & Security of Health Information

Certain laws and regulations require that practitioners and health plans maintain the privacy of health information. In general, privacy is about who has the right to access personally identifiable health information. Privacy regulations, such as the Health Insurance Portability and Accountability Act (HIPAA) cover all individually identifiable health information in the hands of practitioners, providers, health plans, and healthcare clearinghouses.

Hospital facilities take privacy regulations very seriously. HIPAA impacts students in the following ways:

- Patient records may not be photo copied or printed from a computer terminal for personal use (i.e. writing care plans or other papers).
- Students must not release any patient information independently. Any request for patient information should be directed to the student's Hospital preceptor/supervisor.
- Violations of HIPAA may result in termination of the student experience.

Identifiable Information

The following is considered identifiable information by HIPAA and must not be accessed or shared for any purpose other than patient care.

- Names or initials
- All geographic subdivisions smaller than a state, including street address, city, county, precinct, zip code
- All elements of dates relative to an individual, including birth date, admission date, discharge date, date of death, and all ages over 89
- Telephone numbers
- Fax numbers
- Electronic mail addresses
- Social Security numbers
- Medical record numbers
- Health plans beneficiary number
- Account numbers
- Certificate/license numbers
- Vehicle identifiers and serial numbers, including license plate numbers
- Device identifiers and serial numbers
- Web Universal Resource Locators (URLs)
- Internet Protocol (IP) address numbers
- Biometric identifiers, including finger and voice prints
- Full face photographic images and any comparable images
- Any other unique identifying number, characteristic, or code, derived from the information listed

Do not use any of the above elements when writing reports or making presentations. De-identified patient information is still considered confidential and may not be disclosed without Hospital's permission.

Other Protected Information

While this section primarily addresses the requirements of the HIPAA Privacy Rule, additional protections and requirements may apply to certain types of sensitive information, such as substance abuse records, genetic test results, Social Security numbers and credit card numbers. If a student assignment includes accessing or disclosing these types of information, ask your supervisor/preceptor for relevant policies and procedures.

Additional steps to protect a patient's privacy

- Close room doors when discussing treatments and administering procedures.
- Close curtains and speak softly in semi-privacy rooms when discussing treatment and performing procedures.
- Avoid discussions about patients in public areas such as hallways, the cafeteria/cafe, waiting rooms, restrooms and elevators.
- Do not discuss patients with family or friends.
- Do not leave patient charts, schedules, or computer screens containing patient information in plain view.
- Do not allow visitors or patients in staff areas, dictation rooms, chart storage areas, etc.
- Do not hold telephone conversations or conduct dictation in areas where confidential patient information can be overheard.
- Call out the patient's name only in waiting rooms, not their diagnosis or procedure.
- If you receive an Hospital computer systems access code or password, do not share it with anyone. Take precautions to prevent others from learning your access code and password.
- Do not access systems you are not authorized to access. Access only information needed to do your assigned rotation.
- Before discarding any patient-identifiable information, make sure it is properly shredded or locked in a secure bin to be destroyed later. Do not leave information intact in a trashcan.
- Do not use cell phones or other electronic devices to take or send photographic images and audio/video recordings of patients and/or medical information.
- Do not publish medical information, photo images or audio/video recordings on networking web sites or blogs, such as Twitter or Facebook. This includes de-identified and "virtually" identifiable information.
- If a patient asks, you may take a picture of the patient using the patient's personal device only. Do not take a picture of a medical procedure or one of a sensitive/personal nature.

- Email communication involving patient information is not permitted as a means for student learning.

National Patient Safety Goals

Hospitals follow National Patient Safety Goals established by The Joint Commission to improve patient safety. The goals focus on problems in health care safety and how to solve them.

Identify Patients Correctly

- Use at least two ways to identify patients. For example, use the patient's name and date of birth. This is done to ensure each patient receives the correct medicine and treatment.
- Ensure the correct patient receives the proper blood during a transfusion.
 - Two-person double check: one individual must be a licensed healthcare provider transfusing the blood/blood product and the second individual must be a trained staff member.
 - One-person verification can be done using barcode technology.

Improve Communication

- All critical test results must be reported to the patient's physician.

Use Medications Safely

- Before a procedure, label medicines that are not labeled. For example, medicines in syringes, cups and basins. Do this in the area where medicines and supplies are set up.
- Take extra care with patients who take medicines to thin their blood.
- Separate look-alike and sound-alike medications.
- Record and pass along correct information about a patient's medicines. Find out what medicines the patient is taking. Compare those medicines to new medicines given to the patient. Make sure the patient knows which medicine to take when they go home. Tell the patient it is important to bring their up-to-date list of medicines every time they visit a doctor.

Use Alarms Safely

- Make improvements to ensure that alarms on medical equipment are heard and responded to on time.
 - When an audible or electronic clinical alarm is activated, the nearest available clinical staff responds promptly to the patient's bedside and assesses the patient's needs.

Prevent Infection

- Use hand cleaning guidelines established by the Centers for Disease Control and Prevention or the World Health Organization. Set goals for improving hand cleaning. Use the goals to improve hand cleaning.
- Use proven guidelines to prevent infections which are difficult to treat.

- Use proven guidelines to prevent infection of the blood from central lines.
- Use proven guidelines to prevent infection after surgery.
- Use proven guidelines to prevent infections of the urinary tract caused by catheters.