



# VVC Clinical Compliance Policy

## Purpose & Application

All Victor Valley College (VVC) EMS Program students that have clinical experience have Clinical Compliance requirements they must meet. These requirements are based on a legal agreement between VVC, of which the EMS Programs, and the clinical site and/or agency. In these agreements, VVC agrees that each EMS student will meet certain criteria before being placed at a clinical site/agency and will maintain compliance for the duration of their rotation(s). These requirements will be communicated to VVC students by the Clinical Coordinator.

All students in clinical settings, regardless of the type and location of the setting, must meet **all** Clinical Compliance requirements for the EMS Program **and** every clinical site to which they are assigned, including requirements related to COVID-19 vaccination and/or testing. The EMS Program will not modify assigned clinical placements if a student cannot or does not comply with the clinical sites'/agency requirements. Please also keep in mind that clinical requirements for sites/agencies will continue to change.

## Responsibility

Each student is responsible for achieving and maintaining their own compliance.

## Systems

Requirements of the EMS Program and most clinical site partners/agencies are uploaded and tracked in various compliance systems. Some sites/agencies track compliance requirements using paperwork. The EMS Program may or may not pay for the students' accounts in the compliance systems, which depends on the EMS course enrolled in. Students are responsible for paying all other fees associated with the clinical compliance requirements, if applicable, including their drug/alcohol test(s) and background check(s), regardless of results.

## What Does It Mean to Be Compliant?

### Compliant

- Students are considered compliant when all requirements (see your Clinical Compliance Checklist for requirements) have been submitted and approved.
- Before the start of each semester, all requirements must be valid (i.e., not due to expire) for the entire semester.
- Certain requirements cannot be renewed/submitted early as they must follow specific timelines. These items may include Hep B, Varicella, MMR, Tdap, Flu shot, Covid-19, etc.
- Students who are unable to complete an item requiring renewal prior to the start of a semester/clinical or field rotation must contact the Clinical Coordinator for approval to complete a requirement later. Approval is not guaranteed.

### Non-Compliant

- Students are considered non-compliant when any requirement is not valid and approved at the time of the deadline. In addition, no requirements are allowed to expire during the semester.
- Non-compliant students will be unable to participate in clinical/field rotations and may face additional disciplinary actions.
- Inability to participate in clinical/field rotations may impact your course grade and the successful completion of the semester and/or program.



## VVC Clinical Compliance Checklist – EMS Program Students

### Purpose & Application

Per the Victor Valley College (VVC) EMS Program [Clinical Compliance Policy](#), all students in programs that have clinical/field experiences, have Clinical Compliance requirements they must meet. Please keep in mind that according to this policy, these requirements are not permitted to expire while a semester/program is in session, unless they follow a specific medical timeline. This means you may be asked to renew prior to the expiration of a requirement.

On the following pages is a checklist of clinical compliance items that are **required** of VVC EMS Program students in a program who are required to complete clinical/field experience hours. EMS Programs include, but are not limited to, Emergency Medical Technician Basic (EMT-B) EMS 60 courses, Emergency Medical Technician Paramedic (EMT-P) EMS 80-86 courses, or Emergency Medical Technician Critical Care Paramedic (CCP) EMS 9090 or 9091 courses.

### Completing Requirements

Several of these items can take a while to complete; the EMS Program strongly encourages you to start completing these items and collecting the required documentation **as soon as possible**. Below is an outline of the requirements; **it is important to carefully read all details of each requirement** on the following pages.

**\*\* Please note that students will not have access to the background/drug testing until after the first day of their course.**

### Requirement Checklist

#### ☐ Drug Test – ONLY AFTER FIRST DAY OF CLASS

- A negative Drug Test is required. Please review your institution's [Drug/Alcohol Test Policy & Procedures](#) for more details.
  - You must order a Drug Test through the designated compliance system. Once complete, your results will not automatically be uploaded to your account.
  - It is strongly encouraged to not consume more than 8oz of water within 2 hours of your scheduled collection time.

#### ☐ Background Check - ONLY AFTER FIRST DAY OF CLASS

- An acceptable Background Check is required. Please review your institution's [Criminal Background Check Policy](#) for more details on what is acceptable.
  - You must order a background check through the designated compliance system. Once complete, your results will not automatically be uploaded to your account.
    - Students using Castle Branch will be prompted by Castle Branch to complete additional checks, if necessary. No extra action is required beyond ordering a standard background check.

#### ☐ Tuberculosis (TB) Test – PRIOR TO FIRST DAY OF CLASS

- *First TB Test submission:* one of the following must be submitted.
  - *TWO* Negative PPD Skin Tests
    - You must wait at least 1 week before completing the 2<sup>nd</sup> test, but no more than 6 months.
  - *ONE* Negative QuantiFERON (IGRA) Blood Test

- *ONE* Negative T-Spot Blood Test
- *ONE* Clear Chest X-Ray
  - Required if you receive a positive result on any other TB Test, but can be completed by anyone, even if no prior positive result was recorded.
- TB Test *renewals*: all options above must be renewed annually, at minimum.
  - Skin Test/Blood Test Renewals:
    - You may renew by submitting *ONE* negative PPD Skin Test or any other acceptable option listed above.
    - You can submit any option, no matter which type of test was submitted previously.
  - Chest X-Ray Renewals:
    - If you tested positive for TB and were therefore required to complete a Chest X-Ray, you *must* renew following the process for a Chest X-Ray Renewal as outlined below.
    - If you have *not* tested positive for TB, but opted to complete a Chest X-Ray, you may renew by submitting any other acceptable option or by following the process for a Chest X-Ray Renewal as outlined below.
    - You must submit a Chest X-ray at least every two years, but the year between X-Rays you must submit a Clearance Exam/Questionnaire from your healthcare provider clearing you of any TB signs and symptoms.

#### ☐ Hepatitis B (Hep B) – PRIOR TO FIRST DAY OF CLASS

- You must submit proof of a positive Surface (HBsAb) Antibody Hepatitis B Titer and proof of immunity for Hep B at some point in your life.
  - Please review the [Hepatitis B Steps Flowchart](#) for more information on the Hepatitis B compliance process.
    - If you are now starting your 2-3 dose series, or require a booster series, due to a negative Surface (HBsAb) Antibody Hepatitis B Titer, you will have temporary compliance until a positive Surface (HBsAb) Antibody Hepatitis B Titer can be submitted.
    - If you are unable to obtain immunity, you must provide proof of a completed initial series, initial titer, completed booster series, and a repeat titer. After all the above has been submitted, your healthcare provider must provide a non-converter statement.

#### ☐ Measles, Mumps, Rubella (MMR) – PRIOR TO FIRST DAY OF CLASS

- You must submit a completed 2 dose MMR series and proof of positive immunity for Measles, Mumps, and Rubella with titer tests.
  - If you are now starting your series, you will have one month of temporary compliance after your first dose.

#### ☐ Varicella (Chicken Pox) – PRIOR TO FIRST DAY OF CLASS

- You must submit a completed 2 dose Varicella series and proof of positive immunity for Varicella with a titer test.
  - If you are now starting your series, you will have one month of temporary compliance after your first dose.

#### ☐ Tetanus, Diphtheria, and Pertussis (Tdap) – PRIOR TO FIRST DAY OF CLASS

- You must submit proof of an administered Tdap.
  - If your submitted Tdap exceeds 10 years you must additionally provide an administered

Tdap Booster from within the last 10 years.

☐ COVID-19 – PRIOR TO FIRST DAY OF CLASS

- The VVC EMS Programs does not mandate the COVID-19 vaccine, but clinical sites vary on what they require/except for COVID-19 documentation. Please review our information on [COVID-19 and Clinical Rotations](#) for more information. Based on your COVID-19 vaccine status please complete this requirement as outlined below.
  - If you have received your COVID-19 doses, please submit them.
  - If you are in the middle of completing your COVID-19 doses or intend to complete them soon, please contact the Clinical Coordinator for further instructions.
  - If you have not *and* do not intend to receive your COVID-19 doses, please contact the Clinical Coordinator to determine whether you should submit a declination form or seek an exemption through other means.
    - If you have not been specifically instructed by the Clinical Coordinator to seek an exemption, please complete a declination form.
      - This can be changed at any time if an exemption is required by a clinical site.
      - All exemptions and declinations submitted will be reviewed and approved directly by the Clinical Compliance Coordinators.

☐ Influenza (Flu Shot) – ONLY BETWEEN OCTOBER - MARCH

- You must submit a current flu vaccination or complete a [Flu Declination Form](#)
  - This item is renewed by September 30<sup>th</sup> every year whether you were vaccinated or declined.
  - Your flu shot must be administered no earlier than October 1<sup>st</sup> to be accepted for the current flu season.
  - This category is not tracked between April 1<sup>st</sup> and September 29<sup>th</sup>. Therefore, students who begin their program in the Summer or Fall semester will not be required to submit proof of their flu vaccine until October 1<sup>st</sup> of their Fall semester.

☐ American Heart Association (AHA) BLS/CPR Certification – PRIOR TO FIRST DAY OF CLASS

- An active American Heart Association BLS CPR certification is required.

☐ Health Insurance – PRIOR TO FIRST DAY OF CLASS

- You must submit proof of your personal health insurance.
  - If your last name does not match the name on the policy, you will be required to provide proof of coverage.

☐ Driver's License – PRIOR TO FIRST DAY OF CLASS

- You must submit a copy of your California Driver's License.

☐ EMT-Basic Certification – PARAMEDIC STUDENTS ONLY

- You must submit a copy of your EMT-Basic certification.

☐ Medical Clearance Physical Form – PRIOR TO FIRST DAY OF CLASS

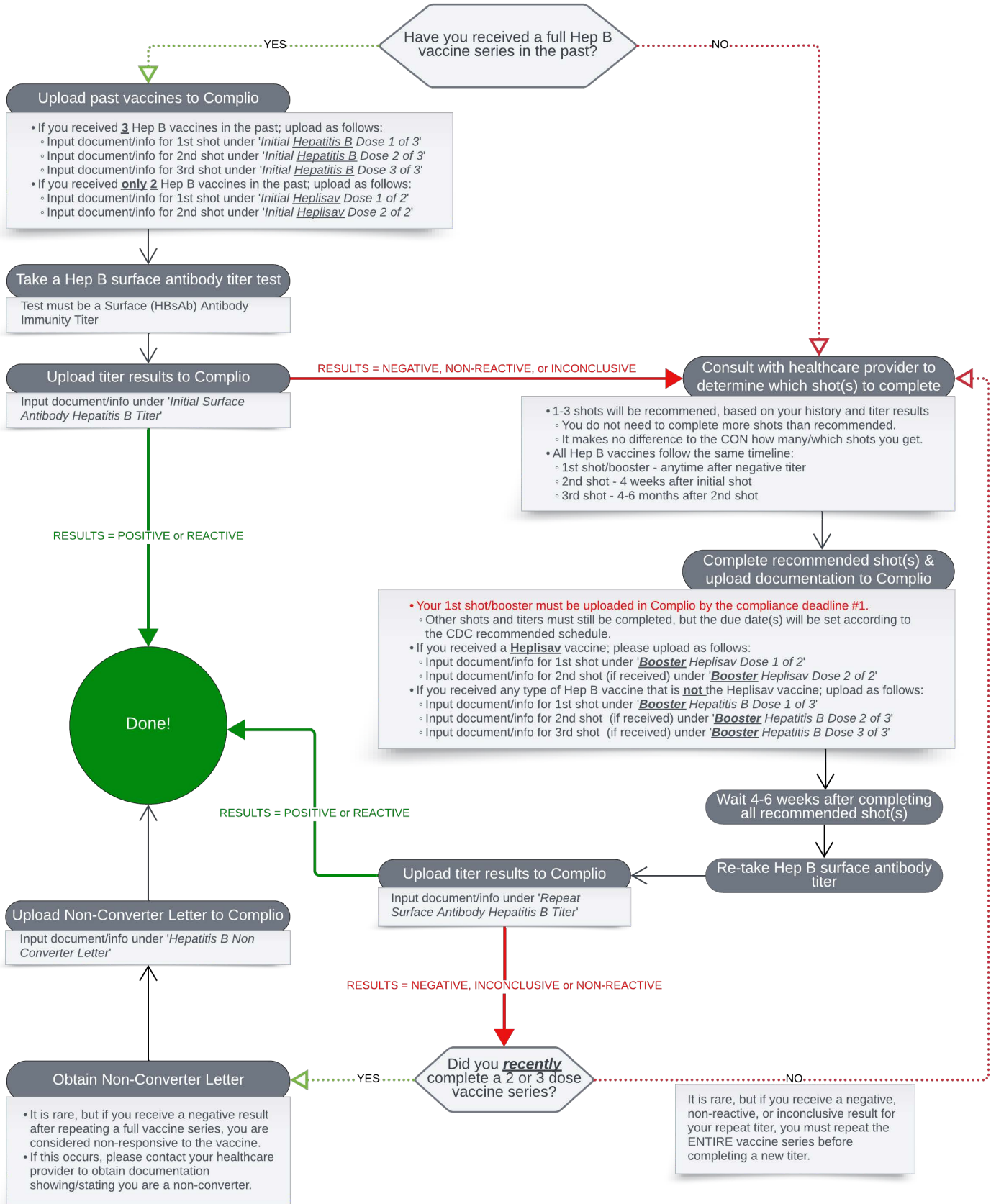
- You must submit a copy of your completed Medical Clearance Physical form.
  - This form must be completed and signed by your Primary Care Physician, Physician's Assistant, or MD/DO.

☐ Forms Requiring Signed Acknowledgement – PRIOR TO FIRST DAY OF CLASS

- You must submit your *First Day Forms packet*.

# Hepatitis B Steps Flowchart

Documentation for each step must be submitted, including past vaccines and negative titers. You should submit this as it is received. Do not wait to get a positive titer to submit documentation







## COVID-19 Vaccine and Clinical Rotations

### Requirement

The Victor Valley College (VVC) EMS Programs do not require students to be vaccinated against COVID-19 but select VVC EMS Programs clinical sites require that students training at their sites be vaccinated against COVID-19.

Many clinical sites do not have vaccination requirements and/or may allow students to request an exemption or accommodation from their COVID-19 vaccination requirement. However, depending on placement availability, it may not be possible for VVC EMS Programs to place unvaccinated students at these sites.

Because the COVID-19 vaccination is required at select clinical sites, and clinical sites that do not require vaccination and/or allow for exemptions may change their vaccination policy at any time, unvaccinated students must understand that there could be situations where VVC EMS Programs will not be able to place an unvaccinated student in a required clinical rotation, even if the student has requested an accommodation.

### Accommodation

Some clinical partners may require students to request accommodations/exemptions through the clinical partner's exemption/accommodation process.

- Unvaccinated students will only be directed to request accommodation, if necessary, due to the requirements of the site they are placed at. If, in the future, they are placed at a site with different requirements, they may follow the appropriate process for an accommodation or exemption, depending on the assigned clinical sites' requirements.
  - If an unvaccinated student that intends to seek accommodation or exemption is placed at a clinical site that has its own accommodation/exemption process, the student should follow the clinical site's accommodation/exemption process.
  - If an unvaccinated student that intends to seek accommodation or exemption is placed at a clinical site that requires students to provide an exemption approved by the student's educational institution, the student should contact the Clinical Compliance Coordinators, as soon as possible. They will provide directions on the next steps for requesting religious or medical accommodation with the VVC EMS Programs.
  - If an unvaccinated student is placed at a clinical site that does not have a vaccination requirement or allows students to decline the vaccine (where no accommodation or exemption is required), they will not be directed to request an accommodation or exemption.
- If a clinical partner does not allow exemptions or accommodations to its vaccination requirement or requires students to go through the clinical partner's exemption/accommodation process and the student's request is denied by the clinical partner, the student may still request an accommodation through the University. **However, the VVC EMS Programs cannot grant exemptions or accommodations to a clinical partner's vaccination requirements.**

### Advanced Program Students (RN-MS, Graduate Certificates and Doctoral Programs)

Most placements are made on a case-by-case basis, so be sure to check the requirements of your clinical facility. If you are not vaccinated and are placed at a rotation site that requires students training at the site to be vaccinated against COVID-19 and does not provide for or allow accommodations or exemptions from this requirement, please contact the Clinical Compliance Coordinators and Clinical Placement Coordinators as soon as possible.

For questions or further information, please contact our Clinical Compliance Coordinators at [bradley.reddall@vvc.edu](mailto:bradley.reddall@vvc.edu) and include your program name and 'Compliance' in the subject line.



# Criminal Background Check Policy

## Applicability

It is the policy of the Victor Valley College (VVC) EMS Programs to conduct background checks on all students who may be required to complete clinical hours. This is done to provide a safe environment for students, employees, patients, and the public, as well as to protect property. This policy is intended to delineate the background check requirements and disciplinary sanctions of the VVC EMS Programs.

Students are expected to comply with all federal, state, and local laws and all rules/regulations, including policies and procedures of the VVC EMS Programs and individual clinical partner sites at which the students are assigned.

## Requirements

The VVC EMS Programs require a criminal background check for full admission to all VVC EMS Programs requiring clinical hours. **Students will not be able to complete the background until they are provided with a code after the first day of their course.** Students who fail to comply with all aspects of this policy will not be admitted to their clinical/field rotations, removed from and/or not placed in a clinical site, and may be withdrawn from their program and the VVC EMS Programs.

## Protocol & Implementation

Students required to complete a background check must:

- Order the background check through the VVC EMS Programs designated compliance system or the clinical site, if applicable.
- Pay all background check fees, if applicable.
- Have complete results consistent with VVC EMS Programs policies recorded and visible in the designated compliance system by the published deadline
- Immediately inform the Clinical Coordinator of any arrests, convictions, or charges.
- Refusal to complete a background check will result in dismissal from the program, as this is a requirement of our clinical site partners.
- Students may be required to complete additional background checks as required by the specific clinical site partners, and at the student's cost.

The following databases will be searched for the required background check. Searchable information may include, but is not limited to the following:

- County Criminal Database
- Statewide Criminal Database
- Statewide Sex Offender Index
- Statewide Parole and Probation
- Statewide Federal Criminal Database
- Nationwide Criminal Database
- National Sex Offender Index (NW Record Indicator with SOI)
- Nationwide Healthcare Fraud and Abuse Scan that searches for sanctions taken by the following:
  - Office of Inspector General (OIG)

- General Services Administration (GSA)
- Office of Research Integrity (ORI)
- Office of Regulatory Affairs (ORA)
- Office of Foreign Asset Control (OFAC)
- Nationwide Patriot Act
- Nationwide Federal Criminal Database
- Nationwide OIG (US Dept Health and Human Services Office of Inspector General) Check
- International Criminal Database
- Nationwide FBI Fingerprinting Database
- Social Security Alert
- Residence History

## Results

If a student's background check produces **any** of the following results, the student will be denied admission to the clinical/field rotations and/or will be dismissed from their clinical placement.

- Inclusion on any registered sex offender database.
- Inclusion on any of the federal exclusion lists or Homeland Security watchlist.
- Any felony conviction.
- Any criminal arrest warrant in any state.
- Any misdemeanor controlled-substance conviction within the last 7 years.
- Any other misdemeanor convictions within the last 2 years, except for non-DUI traffic violations.





# Drug/Alcohol Test Policy & Procedures

## Purpose

It is the policy of the Victor Valley College (VVC) EMS Programs that students are functioning free from the influence of illicit or illegal substances. The use of controlled substances (unless prescribed by a clinician), marijuana (including medical marijuana) or illegal substances is prohibited by the Victor Valley College (VVC) EMS Program. This policy is intended to delineate drug/alcohol testing requirements and disciplinary sanctions of the VVC EMS Programs.

Students are expected to comply with all federal, state and local laws and all rules/regulations concerning drug and alcohol use, including rules, policies and procedures of the VVC EMS Programs and individual clinical/field sites at which the students are assigned.

## Requirements

The VVC EMS Programs require a drug/alcohol test for participating in all clinical programs. Students may be required to complete additional drug/alcohol tests to meet the compliance standard of specific clinical/field site partners. **Students will not be able to complete the drug/alcohol testing until they are provided with a code after the first day of their course.** Students who fail to comply with all aspects of this policy, including refusing to test for any reason at any time, will be denied the ability to schedule clinical/field shifts which will result in dismissal from the program.

## Protocol & Implementation

Students who are required to complete a drug/alcohol test must:

- Order the drug/alcohol test through the VVC EMS Programs designated clinical compliance system.
- Complete the drug/alcohol test via urine sample.
- Pay all drug/alcohol test fees, if applicable.
- Have drug/alcohol test results consistent with VVC EMS Programs policies recorded and visible in the designated compliance system by the published deadline.

The drug/alcohol test screens for the following substances:

Alcohol, Ethyl (U)	Cocaine	Opiates
Amphetamine (Methamphetamine)	Marijuana	Propoxyphene
Barbiturates	Methaqualone	Phencyclidine
Benzodiazepine	Methadone	

## Results

- Students whose drug/alcohol test results are **negative** may proceed with their clinical placement.
- Students whose drug/alcohol test results are **positive**, will be contacted by the Castle Branch Medical Review Officer (MRO).
  - Students using prescription medications that may result in a positive drug/alcohol test are advised to be prepared to provide the MRO prescriptions and/or a doctor's note for review.
  - The MRO will interpret the results and discuss the results with the designated Clinical Coordinator to determine if the results are consistent with the VVC EMS Programs policies.
  - If it is determined the results are not consistent with the VVC EMS Programs policies the student will be denied clinical/field placement and/or will be dismissed from their clinical placement, and program.

- Students whose drug/alcohol test results are **inconclusive**, regardless of the cause, are required to retest at their own expense since inconclusive test results are not consistent with VVC EMS Programs policies.
  - Inconclusive test results may include results such as dilute negative, dilute positive, cancel, invalid, rejected, interference, and more.
  - Retesting is only permitted after an inconclusive test result is recorded and visible in the designated compliance system.
    - Retesting is permitted after inconclusive test results, no matter how many inconclusive test results have previously been recorded.
    - If a student receives any test results other than inconclusive, the policy will be enforced as detailed above.

## “For Cause” Testing

This policy refers to the use/misuse of, or being under the influence of alcoholic beverages, illegal drugs, or drugs that impair judgment while on duty in any healthcare facility, school, institution, or other work location as a representative of the VVC EMS Programs. Students in the VVC EMS Programs are expected to adhere to the VVC EMS Programs Code of Ethics, which includes safeguarding the patient from harm.

VVC EMS Programs students may be subject to “for cause” testing at any time at the discretion of the clinical site, faculty member or preceptor. “For Cause” Testing may occur when:

1. A clinical supervisor or faculty perceives the odor of alcohol or observes behavior such as, but not limited to, slurred speech, unsteady gait, or confusion **and**
2. These behaviors cause the faculty or clinical instructor to suspect the student is impaired by alcohol or drugs.

In all circumstances, site-specific safety protocols must be followed. Additionally:

- The preceptor/clinical supervising faculty will remove the student from the patient care or assigned work area and notify the clinical agency supervising personnel and VVC EMS Programs Clinical Compliance Coordinator(s).
- If a student admits to alcohol or drug use, they will still require drug screening within 48 hours.
- If the results of the test(s) are **negative** for alcohol, marijuana, illegal substances, or non-prescribed legal substances, the student shall meet with a representative from the VVC EMS Programs within 24 hours of the test results to discuss the circumstances surrounding the impaired clinical behavior.
  - If the indicator was the odor of alcohol, the student will be mandated to discontinue the use of whatever may have caused the alcohol-like odor before being allowed to return to the clinical setting.
  - If the indicator was behavioral, consideration must be given to a possible medical condition being responsible for the symptoms. A medical referral for evaluation may be indicated.
  - Based on the information provided and, if warranted, further medical evaluations, the College of Nursing will make a decision regarding the return to the clinical setting.
- If the results of the test(s) are **positive** for alcohol, marijuana, illegal substances, or non-prescribed legal substances the student may be dismissed from their clinical/field shifts immediately.
- If a student refuses “For Cause” Testing, the preceptor/clinical supervising faculty will remove the student from the clinical setting pending a full investigation.



## VVC Vaccination Declination Form

Student Name: \_\_\_\_\_

Program (EMT/Paramedic) and Section Number: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

### Instructions

As a student enrolled in the Emergency Medical Services (EMS) Programs at Victor Valley College (VVC), you may be exposed to infectious diseases during clinical and field internship experiences. The following immunizations and testing are strongly recommended or required by clinical and field affiliates for your safety and the safety of patients, staff, and the public.

Please initial next to each item you are declining and sign the acknowledgment below:

Vaccine/Test	Decline (Initial)	Notes
Hepatitis B Vaccine	_____	Series of 2-3 vaccines
MMR (Measles, Mumps, Rubella)	_____	2-dose vaccine series
Varicella (Chickenpox)	_____	2-dose vaccine
Tdap (Tetanus, Diphtheria, Pertussis)	_____	One adult dose within the past 10 years
COVID-19 Vaccine	_____	2 shot series with a booster
Influenza (Flu) Vaccine	_____	Annual vaccination recommended during flu season ( <i>October – March ONLY</i> )

### Acknowledgment of Risk and Responsibility:

I understand that by declining the vaccinations listed above, I may be at increased risk of contracting or transmitting preventable diseases.

*I acknowledge that:*

- Clinical and field internship sites may deny me access or participation due to lack of required immunizations.
- This may affect my ability to complete the program requirements and graduate on time.
- I accept full responsibility for any consequences related to my decision to decline one or more immunizations or testing.
- I release Victor Valley College, its EMS programs, and its affiliates from liability related to my decision.

Student Signature: \_\_\_\_\_ Date: \_\_\_\_\_