University of North Carolina at Chapel Hill  
School of Nursing  

Student Compliance Program Policy  

Overview:  
Infectious/communicable diseases are common and may be a threat to students and faculty of the School of Nursing. During the performance of clinical practice/research activities, students may interact with clients/research participants with tuberculosis (TB), hepatitis B (HBV), HIV/AIDS, and other infections. This contact may expose the student to infectious agents, and may result in the student transmitting an infectious disease to other students, faculty, clients, family members, and research participants. During pregnancy, the fetus may also be at risk. Conversely, the student’s health status may adversely impact the students’ abilities to interact with clients/research participants. Should an exposure or a high-risk situation occur, clinical or research experiences may require alteration to provide optimal student learning and to ensure the well being of both client and student.

Additionally, state and federal statutory regulations, University policy and accreditation standards for affiliated clinical agencies require that nursing students demonstrate particular cognitive and clinical competencies consistent with their minimum practice standards. As such, the School is contractually mandated to ensure all students attain and maintain full compliance with each required competency detailed in this policy. Further, the School is contractually obligated to share individual student compliance data with health care agencies to which students have been assigned for clinical educational experiences.

Student Responsibilities:  
All students are responsible for maintaining their own health, protecting themselves and the clients/research participants with whom they interact from communicable/infectious disease, and attaining and maintaining competency with identified practice standards.

Students admitted to the School must achieve compliance with all health, safety and legal requirements applicable to the program to which they have been admitted prior to the first day of classes. Continuing students must maintain full compliance with all renewable requirements throughout their tenure with the School. Student compliance is required of all enrolled students. This includes those enrolled in clinical and non-clinical courses. Students should retain all original documentation pertinent to each requirement in a personal file and provide a legible quality copy of each document to the Office of Admissions and Student Services (OASS) for entry into the student database and placement in the student’s compliance program file. Documents may be submitted in person, via US mail, via fax or as a PDF via email.

Further, supplementary requirements may be contractually mandated by any clinical agency to which students may be assigned. These additional elements are required, non-negotiable and deemed as critically important as School/University requirements. Students are informed of their clinical assignment through student registration or communication with the Clinical Site or Advanced Practice Area Coordinators. Students are then responsible for meeting all applicable elements described in the Health and Safety Database (HSR; described elsewhere in this document). Students must check their status in the HSR as often as necessary to ensure all submission deadlines are met and no item expires, as there is no grace period. It is the sole responsibility of each student to maintain a current knowledge of his/her compliance standing with all School, University and agency requirements.
**Consequences of Non-Compliance:**
- Upon program entry, any student who fails to attain compliance by the first day of class, will not be permitted to matriculate. (Exception: students admitted less than two weeks prior to the first day of class must meet compliance by end of the first week of class).
- Continuing students deemed non-compliant by the first day of class in any term, may be withdrawn from the affected clinical course(s), and, following advisement by the appropriate Program Director, will establish an alternate study plan and re-enroll in needed clinical courses in a later semester.
- Students who attain compliance initially but fail to properly maintain compliance with School, University or agency-specific requirements will jeopardize their access to course information via Blackboard, incur an academic hold on their University account, and have their clinical privileges revoked. If a student is deemed non-compliant for more than five business days, the student will be reported to the appropriate Program Director and Academic Standards Committee for formal review and action. Note: Students are accountable for all course content, assignments or tests missed during the period their Blackboard access privileges are withdrawn. Faculty are not responsible for disseminating missed content or providing alternative assignments or testing opportunities.
- *Failure to attain or maintain compliance with the School’s health, safety and legal requirements may result in student disenrollment. Note: no grace period exists following the confirmed expiration date or posted submission deadlines.*

**Exceptions:**
1. AHA BLS-CPR certification (2010 guidelines) for newly admitted pre-licensure undergraduate students may be obtained via classes offered by the School twice each year, however, all must meet this requirement by the last date on which the School-based courses are taught.
2. Due to the limited clinical engagement of students in the RN-BSN option, compliance with all requirements is not necessary until eight weeks prior to the first day of class for NURS 494. At all other times, RN-BSN students must comply with Mumps, Measles and Rubella (MMR) and Dpt/Td/Tdap vaccinations requirement as well as HIPAA training/testing and the Universal Confidentiality Statement. A statement attesting to the student’s understanding of this compliance procedure is signed during orientation.
3. Master’s and Post-Master’s students may request exemption from professional liability insurance coverage for any semester in which they are not registered for a clinical course. The request shall be made to the Asst. Director for Student Compliance and, if approved, shall NOT extend to any other requirement.
4. Master’s students registered for N992 or N993 only and NOT engaged in data collection involving human subjects may request waiver of renewable compliance requirements (annual TB testing, OSHA, CPR renewal and professional liability insurance coverage). The waiver must be signed by the student and his/her thesis/project advisor, and submitted to OASS promptly for approval.
5. Doctoral students must meet compliance requirements commensurate with the intensity of client/human subject contact they experience through research or employment activities. These students submit a waiver, signed by both the student and his/her faculty advisor, at the start of each semester denoting the extent of contact the student expects to have in academic activities. If the student’s situation changes, as it may with employment as a Teaching or Research Assistant, or in the course of dissertation work, the student must submit a revised waiver, and simultaneously attain full compliance with all applicable requirements prior to engaging in an elevated level of client contact.
Requirements by level of client/subject contact:

- **No contact or indirect contact**: demonstrated MMR, DPT, and TDaP immunity; annual seasonal influenza vaccination, annual HIPAA training/testing; confidentiality statement, and health insurance;
- **Non-invasive direct contact**: As above plus two-step TB screening; demonstrated Varicella immunity; and OSHA training/testing;
- **Invasive direct contact**: As above plus demonstrated Hepatitis B immunity.
  - If serving as supervising Clinical Faculty/Teaching Fellow, must additionally evidence current AHA-BLS certification and an unrestricted NC RN license.
  - If conducting data collection for the dissertation, professional liability insurance is required.

International Travel:
The School of Nursing values international educational, research and service experiences. Students participating in international travel which is funded by the University or for which course credit is awarded must adhere to the University’s policies related to international travel, including adherence to University policy related to high-risk or prohibited destinations (see: http://global.unc.edu/). In addition, all such students must be administratively cleared by the Office of Admission and Student Services prior to, and upon return from, any travel outside the United States. University policy also requires student adherence to all health and security requirements established by the Centers for Disease Control and Prevention and/or the US Department of State http://wwwn.cdc.gov/travel/default.aspx; http://www.state.gov/travel/ Neither University policies nor School of Nursing requirements related to international student travel may be modified by individual faculty, campus departmental/school personnel or staff of external organizations. Exceptions to policies or requirements are not allowed. (Approved: Academic Affairs Council, 09/08/09)

School of Nursing’s Role:
It is the responsibility of the School to maintain an accurate record of all student documentation related to the Compliance Program. Data are maintained electronically as well as in hard copy form in the student’ compliance file. The hard-copy file is returned to the student at the completion of his/her academic program.

It is further the responsibility of the School, as delegated to OASS, to notify students of upcoming requirement expirations. This is accomplished via use of a secure, PID-authenticated database that is web-accessible. The Health and Safety Requirements Database (HSR) is designed to enable students to easily identify the site-specific compliance requirements for the School of Nursing as well as all clinical agencies who mandate the completion of additional elements. Additionally the HSR makes available any agency specific forms, documents, tutorials, etc necessary for fulfilling compliance requirements for a given agency. Finally and most importantly, the HSR contains all student specific data enabling students to check their compliance status for all required elements relative to the School’s requirements or those of an assigned clinical agency. In totality, this system replaces reminder memos and any need for the School to notify students of impending deadlines, expirations, etc.

Lastly, the School of Nursing is responsible for ensuring that all documentation of student data related to School or University requirements are on file with Campus Health Services.
Requirements:
University:
All on-campus students must comply with the University’s Health Requirements prior to matriculation and continuously while enrolled in the School of Nursing.

For Matriculation into the School of Nursing:
ALL Students:
✓ Information Security Policy review and signed Universal Confidentiality Statement
✓ Measles, Mumps, Rubeola, Rubella, & Tetanus (DPT/TDaP): Students (regardless of date of birth) must submit vaccination evidence of:
   ▪ 3 DTP (Diphtheria, Tetanus, Pertussis) or Td booster vaccinations since infancy to include one TDaP vaccination within the past five years.
   ▪ 2 MMR (Measles [Rubeola], Mumps, Rubella) doses
   ▪ Note: Serologic titers confirming immunity for any of these diseases may be submitted in lieu of the vaccination series for that disease
✓ Annual seasonal influenza vaccination, to include H1N1 immunization, as determined the US Centers for Disease Control
✓ Health Insurance coverage to include coverage of health conditions, accidents and blood-/air-borne diseases in the event of exposure during a student’s clinical/research experience; insurance coverage must be validated annually.
   ▪ Note: students may select the insurance carrier of their choice to include the UNC-Chapel Hill Student Health Insurance Plan [http://www.pearceandpearce.com]
✓ Information Security Policy review and submission of signed Universal Confidentiality Statement
✓ HIPPA training and post-testing
   ▪ Note: only UNC Healthcare training and post-testing are accepted; this includes training/testing sponsored by UNC Hospitals, UNC School of Medicine or Rex Healthcare. Students employed by these institutions may submit a copy of their annual HIPAA training/testing completion certificate. All other students must complete the six self-study tutorials available at http://hipaatrain.med.unc.edu. Please follow directions for Group #1 and Group #2. Complete modules 1 thru 5 and notify OASS upon completion.

Additionally, BSN, MSN, PMSN, non-waived RN-BSN, and specific PhD Students (see page 2) are required to provide the following documentation:
✓ Varicella Immunity as validated by either receipt of the two-dose series vaccination, or positive serologic Varicella titer
✓ Hepatitis B Virus immunity as validated by positive serologic HBV titer OR receipt of three-dose series vaccination followed by positive serologic HBV Surface Antibody Titer
   ▪ Note: titer must be reported in numerical value; immunity equates to a positive value of >10.9 mIU/mL
✓ Tuberculosis Screening validated by initial two-step TB screening (Mantoux test) and annual one-step screening thereafter (if TB skin test positive, submission of Annual Tuberculosis Screening Questionnaire (completed by health care provider) and results of a chest x-ray obtained in the diagnostic evaluation of the positive TB test, and a follow-up chest x-ray obtained at least two years after initial evaluation.
• Note 1: a Two-Step Screening means one must submit documentation of the results of two TB tests conducted within 12 months preceding matriculation date. Tests can be conducted no sooner than seven days apart and no more than 12 weeks apart. The purpose of the two-step test is to reduce the likelihood that a booster reaction is later interpreted as a new infection.

• Note 2: The School of Nursing prohibits students from interpreting their own TB test results or from asking School faculty to make this determination. Only the test source may interpret the results and issue a final reading determination.

✓ Current CPR Certification: only the Basic Life Support course (based on the 2010 guidelines) certified by the American Heart Association is accepted

• Note: PALS or PALS-Instructor certification may be substituted for students in the pediatric NP specialty; students in the BSN or PhD programs or the adult NP specialties (ANP, FNP, PMH CNS/BP or WHNP) of the MSN program may substitute BLS-Instructor, ACLS, or ACLS-Instructor for this requirement.

✓ OSHA training and post-testing (to include blood- and air-borne pathogens, universal precautions, and applicable safety content specific to clinical agencies.)

• Note: Only UNC Healthcare or UNC-Chapel Hill training/testing is accepted. Students employed by either of these institutions may submit training/testing verification from their supervisor or testing service. All other students must complete the self-study tutorials and post-tests for Bloodborne Pathogens, Tuberculosis and Infection Control, and Healthcare Worker/JCAHO Safety Information at the following URL: http://ehs.unc.edu/training/self.shtml. Students are responsible for submitting documentation verifying completion of the online tests.

Pre-licensure (BSN & ABSN Options), MSN and PMSN Students are required to provide the following additional documentation:

✓ Assessment of Current Health Status (original form MUST be submitted). A repeat assessment is required for any student taking a Leave of Absence greater than one term or who has experienced a significant health event during a term (eg. short or long term hospitalization, surgical intervention, communicable disease treatment, diagnosis of a chronic health condition). (Approved by MEC 10/09)

MSN, Post-MSN and specific PhD Students (see page 2) are required to additionally provide the following documentation:

✓ Copy of current unencumbered license as a registered nurse in the state in which the student will do clinical course work. Note: an "unencumbered license" means neither the license, the licensee's practice, nor the licensee is associated with any type of restriction, encumbrance, or probationary limitations imposed by the applicable Board of Nursing or any judicial entity.

✓ Copy of cover page of Professional Liability (Malpractice) Insurance policy (coverage limits: $1 million per event/$3 million aggregate)

• Note: Effective March 1, 2006, all nurse practitioner students MUST carry “NP-Student Liability Insurance”.

Renewable Requirements:

Annually:

✓ Tuberculosis Screening validated by annual TB screening (Mantoux test) or, if TB skin test positive, submission of Annual Tuberculosis Screening Questionnaire (completed by primary provider)
✓ Annual seasonal influenza vaccination to include H1N1 immunization
✓ Annual OSHA training/post-testing (to include blood- and air-borne pathogens, universal precautions, and applicable safety content specific to clinical agencies.)
✓ Annual HIPPA training and post-testing
  ▪ Note: Only UNC Healthcare or UNC-Chapel Hill training/testing is accepted. Students employed by either of these institutions may submit training/testing verification from their supervisor or testing service. All other students must complete the self-study tutorials and post-tests for Bloodborne Pathogens, Tuberculosis and Infection Control, and Healthcare Worker/JCAHO Safety Information at the following URL: http://ehs.unc.edu/training/self.shtml. Students are responsible for submitting documentation verifying completion of the online tests.

Variable timeframe:
✓ Current CPR Certification: only the Basic Life Support course (based on the 2010 guidelines) certified by the American Heart Association is accepted
  ▪ Note: PALS or PALS-Instructor certification may be substituted for students in the pediatric NP specialty; students in the BSN or PhD programs or the adult NP specialties (ANP, FNP, PMH CNS/BP or WHNP) of the MSN program may substitute BLS-Instructor, ACLS, or ACLS-Instructor for this requirement
✓ Licensure renewal: RN-BSN, MSN and Post-MSN students must maintain a current unencumbered license to practice as a Registered Nurse throughout their program of study
✓ Copy of cover page of Professional Liability (Malpractice) Insurance policy (coverage limits: $1 million per event/$3 million aggregate)

Immunization Exemptions:
Students have the right to petition for an exemption from statutorily required or School required immunizations. Appeals must be based on a student’s health condition, medical disorder or religious beliefs. Documentation supporting the exemption should be submitted to the Office of Admissions and Student Services and must include:

- Medical exemption: students seeking exemption due to medical condition (e.g. severe allergic reaction) or health condition (e.g. immune deficiency or pregnancy), must submit a written justification from his/her personal medical provider explaining why the vaccination is contraindicated; OR
- Religious exemption: students seeking exemption for all matters related to religious beliefs or practices must submit a notarized copy of the “Request for Exemption from Immunization Requirements: Religious Reasons” form. (contact Asst. Director for Compliance for copy)

Exemption information may be shared with the clinical agency to which the student is assigned for educational purposes. The clinical agency determines whether the student may attend clinical at that site without having been immunized as contractually required. Exemption requests based on other factors (philosophical, political, or sociological) will not be considered
## COMPLIANCE PROGRAM REQUIREMENTS
### BY ACADEMIC PROGRAM

<table>
<thead>
<tr>
<th>Upon Matriculation:</th>
<th>Pre-Licensure BSN</th>
<th>RN-BSN*</th>
<th>MSN</th>
<th>P-MSN</th>
<th>PhD*</th>
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| Renewable: | | | | |
| TB Test - Annually | x | * | x | x | * |
| Seasonal influenza vaccination | x | x | x | x | x |
| Health Insurance | x | x | x | x | x |
| OSHA – Annually** | x | * | x | x | * |
| HIPAA – Annually** | x | x | x | x | x |
| AHA BLS CPR Certification – expiration | x | * | x | x | x |
| RN License – Upon expiration | x | x | x | x | * |
| Professional Liability Insurance Upon expiration | * | x | x | x | * |
| Student Waiver – Required EACH semester | x | | | | |

* RN-BSN students enrolled in NURS 494 must submit all documentation required of a MSN Student; additional requirements for doctoral students engaged in clinical practice or research activities involving human subjects are determined by the algorithm on page 2.

** Instructions for OSHA and HIPAA training and testing are detailed in the policy narrative

Note: All requirement-specific forms may be obtained from the HSR (https://nursing.unc.edu/app/hsr). All documentation supporting student compliance with School of Nursing requirements must be submitted to the Office of Admissions and Student Services, Suite 1200 New Addition-Carrington Hall; (919) 966-4260; fax: (919) 966-3540). Contact the Assistant Director for Student Compliance or OASS Director with questions.

Written/Approved: 5/02; Revised 02/03; Revised 04/03; Revised 06/03; Revised 02/04; Revised 04/04; Revised 08/04; Revised 07/05; Revised 02/06; Revised 10.06; Revised 0307; Revised 0607; Revised 0408; Revised 1108; Revised 12/08; Revised 3/09; Revised 4/09; Revised 0809; Revised 1009; Revised 0810; Revised 0311.