

I. POLICY

Student Exposure

II. PURPOSE

It is the policy of EVMS to ensure that students are educated about prevention of exposure to infectious diseases, to promptly address student exposures to infectious diseases, and to have mechanisms and resources for determining the effects, if any, of student exposures to infectious diseases on student learning activities.

III. RESPONSIBLE PARTY AND REVIEW CYCLE

The Associate Dean for Student Affairs and Student Health/Occupational Health will review the policy on an as-needed basis.

IV. ACCREDITATION REFERENCES

LCME 12.4	Student Access to Health Care Services
LCME 12.5	Non-Involvement of Providers in Student Assessment
LCME 12.7	Immunization Requirements and Monitoring
LCME 12.8	Student Exposure Policy/Procedures
SACSCOC 12.3	Student Rights
SACSCOC 12.4	Student Complaints

V. DESCRIPTION

This policy protects students infected with *M. tuberculosis* (TB), Human Immunodeficiency Virus (HIV), Hepatitis B (HBV), Hepatitis C (HCV), and or any other potentially transmissible bloodborne pathogen (BBP) from discrimination, ensures confidentiality of students' personal information, and protects patients from infection. Students must be aware of the potential for transmission of TB and BBPs to patients, take individual responsibility to minimize the potential for patient exposure, and understand their obligation to inform relevant faculty/administrators upon occurrence of a patient exposure. This policy for students is in accordance with related institutional policies, and with the recommendations and regulations of the Occupational Safety and Health Administration, the Centers for Disease Control and Prevention (CDC), and the Association of American Medical Colleges.

Measures to Prevent Student Exposures

EVMS employs multiple measures to prevent student exposures, including pre-matriculation testing requirements, pre-matriculation and on-going immunization requirements, N95 fit testing, education, and exposure card.

Pre-Matriculation Documentation: All EVMS on-campus students are required to present documentation of a two-step tuberculosis skin test (TST, also known as PPD) or an Interferon Gamma Release Assay (IGRA) blood test (either Quantiferon Gold or T-Spot) conducted within

six months prior to the program start date. Students who have received the BCG vaccination must have an IGRA blood test within six months prior to the program start date.

For students who have had a previous positive TST/PPD, or a positive IGRA blood test, the following are required:

- A chest X-ray report within the last 12 months,
- Documentation of evaluation for treatment with antibiotic prophylaxis, and
- Completion of the EVMS TB Symptom Surveillance Questionnaire

Students who have had a previous positive TST/PPD, or a positive IGRA blood test will also be screened annually using the EVMS TB Symptom Surveillance Questionnaire and will be directed to report to EVMS Occupational Health for evaluation if they develop signs or symptoms of active TB disease, including persistent cough, coughing up blood, fever, chest pain, unexplained weight loss, and persistent fatigue. IGRA may be considered as an annual screening in high risk individuals with a history of positive TST or history of treatment for TB.

Pre-Matriculation and On-Going Documentation of Immunizations: In order to reduce the risk of possible exposure to infectious diseases, students are required to have immunizations as required by the CDC, Commonwealth of Virginia laws and regulations, and partnering healthcare organizations.

Respirator Fit Testing: Students who, due to the nature of their academic program are required to wear respirators to protect against exposure to TB and other airborne infectious diseases, must be fit tested for a respirator (typically an N95) at designated times over the course of their program. Further details about these requirements and related procedures can be found in the EVMS Respiratory Protection Plan.

Pre-Matriculation and Annual Education: Students are educated about preventing exposure to infectious and environmental hazards at pre-matriculation and at appropriate times specified by their programs through required online bloodborne pathogen and infection control modules. Visiting medical students from other institutions are required to review EVMS procedures for treating, evaluating, and reporting exposures and to attest electronically to their review of those procedures.

Exposure Card: Students involved in clinical training programs are provided with a laminated instruction card entitled, "Bloodborne Pathogen Instruction for Needlestick, Body Fluid and Other Exposures" that they attach to their ID badge.

Students Exposure Process

Procedures for Care and Treatment after Education-Related Exposures

TB Exposure

Upon exposure to TB, students must immediately cease clinical activities and must comply with the following protocol:

All student exposures to TB must be accurately and promptly report to Occupational Health. During business hours (Monday-Friday 8:30 a.m.-4:30 p.m.), students should contact Occupational Health at 757.446.5870. During evenings, nights, weekends, and holidays, students should contact the EVMS Exposure Pager at 757.669.1157. Students should call the pager again if there is no response within 15 minutes. If at a non-EVMS facility, students should follow the facility's exposure protocol and call EVMS Occupational Health the next business day.

Students with unprotected close contact with a patient who has active TB will be screened as soon as possible ("baseline") and, if negative, again 8-12 weeks later.

If heavy exposure occurred (i.e., repeated or long exposure to aerosolized bacterium from patient with active TB), prophylactic therapy may be started immediately.

If conversion occurred, EVMS will follow current CDC guidelines (https://www.cdc.gov/mmwr/volumes/68/wr/mm6819a3.htm?s_cid=mm6819a3_w).

Exposed students will have a chest x-ray as soon as possible to exclude active disease. Exposed students will then be referred to a treating physician for possible preventive treatment. Students with active pulmonary TB require immediate medical treatment. Referrals to specialists, as needed, will comply with the Non-Involvement of Student Healthcare Providers in Education Policy.

BBP Exposure

Upon knowledge of, or forming a reasonable belief that they are infected with or are at high risk of developing HIV, HBV, HCV, and/or any other potentially transmissible disease resulting from environmental exposure, students must immediately cease from performing exposure-prone procedures as outlined by the CDC and must comply with the following procedures:

- Be familiar with the modes of exposure, including the following:
 - Skin puncture or injection
 - Contact with mucous membranes (eyes, nose, mouth)
 - Contact with non-intact skin (per the CDC: "Feces, nasal secretions, saliva, sputum, sweat, tears, urine, and vomitus are not considered infectious unless visibly bloody")

- Treat the exposure site.
 - Intact Skin Exposure: Students should immediately and thoroughly wash the exposed area with soap and water. Antiseptic scrub solutions should NOT be used.
 - Open Skin Wound: Students should immediately and thoroughly wash the wound with soap and water and pat dry.
 - Splash Affecting Garments: Students should remove garments that are potentially soiled or contaminated and place them in a double red plastic bag.
- Report the exposure to EVMS Occupational Health immediately.
 - During business hours (Monday-Friday 8:30 a.m.-4:30 p.m.), students should contact Occupational Health at 757.446.5870.
 - During evenings, nights, weekends, and holidays, students should contact the EVMS Exposure Pager at 757.669.1157. Students should call the pager again if there is no response within 15 minutes. If at a non-EVMS facility, students should follow the facility's exposure protocol and call EVMS Occupational Health the next business day.
- Notify the attending physician and charge nurse of the exposure.
 - The clinical site should evaluate the type of injury and order lab work on source patient. For a percutaneous injury (i.e., needle stick), non-intact skin, or mucous membrane exposure, the history of the source patient including diagnosis, age, sex, history of transfusions, drug use, sexual partners, and history of HIV testing should be obtained.
 - If at a Sentara Hospital, students should ask for the EVMS Exposure Packet (Blue), rather than the Sentara Exposure Packet (Red). If at Sentara, Bon Secours or CHKD, a "stat" Rapid Exposure HIV on the patient source should be ordered immediately. (Results are usually available within 2-3 hours.) Other labs to be ordered on the patient source include HBsAB, HBcoreAB, and Hep CAB.
- Work with EVMS Occupational Health Department to obtain counseling and to determine if personal lab work is needed.
 - During business hours (Monday-Friday 8:30 a.m.-4:30 p.m.), students should contact Occupational Health at 757.446.5870 or report directly to the Occupational Health suite.
 - If the exposure occurs during evenings, nights, or weekends and post-exposure prophylaxis medications are indicated in consultation with EVMS Occupational Health via the Exposure Pager or with non-EVMS facility protocol, students should go to the nearest emergency room.
- Referrals to specialists, as needed, will comply with the Non-Involvement of Student Healthcare Providers in Education Policy.

Financial Responsibility for Post-Exposure Care and Treatment

EVMS students have no financial liability for testing, medical care, and/or prophylaxis medications for exposures that occur in the context of educational activities, at any EVMS or

non-EVMS facility, provided that students follow the guidance of EVMS Occupational Health and/or exposure protocols at non-EVMS facilities. Students should not provide personal health insurance information for any post-exposure care but should work with EVMS Occupational Health to cover expenses. EVMS Risk Management provides each program director or designee with student accident insurance cards to issue for each student to give to any medical provider when a student requires medical service involving an accident or BBP/needle stick exposure during their training. For visiting students, payment is usually covered by the sponsoring institution but will be determined by the individual site agreement for each particular student.

Student Non-Compliance with Exposure Procedures

Students who do not comply with the requirements of this policy may be subject to disciplinary action under the Code of Student Conduct, up to and including dismissal from EVMS.

Rights and Responsibilities of Students with Infectious Diseases

Student Responsibilities

EVMS has the following expectations of responsibility for students who have or believe they may have been exposed to TB or a BBP:

- Students who are engaged in patient-care activities are encouraged to know their HIV, HBV, HCV, and/or any other potentially transmissible disease status.
- Students are required to complete TB surveillance with EVMS Occupational Health (757.446.5870) annually. Students are responsible for obtaining the necessary documentation and failure to comply will result in removal from clinical rotations until completed. TB surveillance is provided by EVMS at no charge.
- Students are required to carry the student accident insurance card provided by EVMS Risk Management while on a clinical/training rotations at EVMS and non-EVMS facilities.
- Students who are engaged in patient-care activities who have been exposed to any potentially transmissible disease in the context of educational activities are required to report the exposure immediately to Occupational Health, following the procedures listed below.
- Students who are engaged in patient-care activities who know or have a reasonable basis to believe that they are infected with any potentially transmissible disease are expected to seek expert advice about their health circumstances and are obligated, ethically and legally, to conduct themselves responsibly in accordance with such knowledge for the protection of patients and other members of the community.
- Students who are aware of a positive disease status are required to discuss their disease status with the Medical Director of Student Health and Occupational Health to evaluate and address any potential risk to self or other. The student's specific medical circumstances are evaluated confidentially on a case-by-case basis and clinical duties may be modified based upon CDC guidelines. Information regarding students' disease status will be kept confidential and shared with only those individuals with a need to know. Students who are concerned for violations of their confidentiality or possible discrimination or mistreatment

related to their disease status have the right to file a complaint as specified in the non-academic complaint procedures of their program.

Student Rights

Students with, or exposed to infectious diseases shall be assessed on a case-by-case basis, but generally are permitted to continue in the education program as follows:

- Students with latent TB may participate in patient care activities without restriction, while students with active TB will not be allowed to participate in clinical activities until they are determined to no longer be infectious.
- Students who are infected with HIV, HBV, HCV, and/or any BBP will not be excluded from participating in patient-care or educational activities or restricted in their access to patient-care services or facilities because of their health status, unless medically-based judgments in individual cases establish that exclusion or restriction is appropriate for the welfare of patients, the welfare of other members of the patient-care community, or the welfare of the individual.
- Given the low risk of transmission of a BBP, infected students are not obligated to routinely disclose their disease status to patients.

Students are encouraged to contact the Student Disability Officer to discuss accommodations for learning activities, if applicable.

VI. RELATED POLICIES AND PROGRAMS

Anti-Discrimination Policy

Code of Student Conduct Policy

EVMS Infection Control Program

Non-Involvement of Student Healthcare Providers in Education Policy

Program-specific non-academic complaint procedures

Respiratory Protection Program

Students' Rights to a Professional Learning Environment Policy

VII. HISTORY OF APPROVALS AND UPDATES

The following list documents policy approvals and updates by oversight authority, date, and summary of changes. This policy is housed on the Institutional Student Handbook webpage.

- On July 11, 2020, the Office of the General Counsel approved the update to separate the policy from the Institutional Student Handbook and to consolidate various processes.
- On September 15, 2020, the Board of Visitors formally approved the policy.