

	Howard University College of Nursing and Allied Health Sciences Department of Physician Assistant	Policy Number	PHAS - 008
	Student Exposure Policy (Occupational Exposure) – A3.05a, A3.05b, A3.05c	Effective Date	08/01/2022
		Last Reviewed	05/13/2025
	Approved by: Gina S. Brown, Ph.D., MSA, RN, FAAN, FNAP, FADLN Dean, College of Nursing and Allied Health Sciences	Revision Date	05/13/2026
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I. PURPOSE

To establish the process for student education, prevention, and treatment relating to infectious and environmental hazard exposure.

II. POLICY

It is the practice and procedure of the Howard University Physician Assistant Department to implement measures to ensure student safety regardless of setting. The program has adopted the institution policy for student exposure to infectious and environmental hazards. The goals of the occupational exposure plan are to:

1. To prevent work-related injury and illness of Howard University medical, dental, nursing, and allied health students.
2. To prevent spread of communicable diseases to patients treated by Howard University clinical students.
3. To formalize procedures for reporting and managing work-related injuries and illness of Howard University clinical students.

III. DEFINITIONS

Infectious hazard - Exposure to bloodborne pathogens and other potentially infectious materials (OPIM) such as:

- Human blood and body fluids (e.g., semen, vaginal secretions, cerebrospinal fluid)
- Unfixed human tissues or organs
- Cultures containing HIV, HBV, or HCV
- Contaminated sharps or surfaces

Environmental hazard - Exposure to harmful chemical, biological, or physical agents in the environment, including:

- Radiation
- Hazardous chemicals (e.g., in labs or clinical settings)
- Poor air quality or mold
- Unsafe physical conditions (e.g., broken equipment, poor lighting)

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IV. **PROCEDURES**

A. **Health Education**

1. Education: New students will be given a copy of the occupational exposure plan during orientation. Prior to their first patient encounter, they will be educated in universal precautions and isolation requirements.
2. Health Screening and Maintenance: The Howard University Student Health Center will monitor the health status of all medical, dental, and allied health science students with potentially infectious conditions as well as students who are injured or exposed to an infectious hazard as a result of their assigned clinical activities. This will be accomplished through primary prevention screening and post-exposure or post-injury diagnostic testing and treatment. The Howard University Hospital Employee Health Unit requires documentation of health screening and treatment of active disease prior to the time the student presents for Howard University Hospital, and all other hospitals, clinics or physician offices to students are assigned reserve the right to refuse access to their facilities to any student who fails to comply with the occupational exposure plan.

B. **Health Screening**

1. Screening for infections is accomplished prior to matriculation, prior to the student's first patient encounter, and annually thereafter. The following are required of clinical students involved in direct patient care:
 - Initial physical examination physical within 2 years
 - Annual tuberculosis – 2 step PPD or blood screening (QuantiFERON Gold) completed within 21 days
 - Fall semester – screening between March to August
 - Spring semester – screening between July to January
 - Annual influenza vaccine
 - Serology testing is annual and is a part of the annual Health Sciences physical examination
 - a. Proof of immunity through **quantitative** titers:
 - i. MMR (measles, mumps, and rubella) – 2 doses
 - ii. Hepatitis B – 3 doses

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- iii. Varicella – 2 doses
- iv. Hepatitis B – 3 doses
- Tetanus (Td)/Tdap - within the past 10 years
 - a. Tdap should receive a single dose of Tdap prior to their rotation. Tdap dose interval may be as short as two years from the last Td
- Meningitis vaccine, after age 16
- Additional requirements if rotating through other specialties (such as nasopharyngeal)
- COVID-19 vaccine*

* **Effective May 12, 2023**, we strongly encourage all Howard University community members to be fully vaccinated against COVID-19, including boosters. Vaccination will not be required for campus or residence hall access. We encourage everyone to make the best decisions for their health and safety.

Masking on campus is optional except where required, such as health facilities, clinical settings, and clinical training sites. Masks will be optional in classrooms; however, individual faculty may require masks in their courses.

C. Students with Active Disease (Not Work-Related)

1. Colds and Coughs

Any student with cold symptoms (i.e., runny nose, nasal congestion, watery eyes), without constitutional symptoms, may begin or continue his/her clinical assignment unless coughing repeatedly or a temperature of 100.4F or more. Exception: students with viral infections or cold symptoms who work with children, immune suppressed patients, and renal transplant patients will be sent home.

Respiratory hygiene/Cough etiquette

- Cover mouth/nose when coughing or sneezing.
- Use and dispose of tissues.
- Perform hand hygiene after hands have been in contact with respiratory secretions.

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- Consider using a mask to prevent aerosol spread. Consult with your clinical preceptor regarding specific clinical policy on when masks must be used.
- Sit as far away from others as possible when ill with respiratory symptoms.

2. Diarrhea

Students with diarrhea suspected to be viral or bacterial in origin will not be allowed to participate in class or clinical rotations. Medical clearance is advised.

3. Herpes

Students with open herpetic lesions will be relieved from direct patient contact until the lesions are dried and healed.

4. Communicable Disease

Students with a communicable disease (or who have a family member with a communicable disease) should follow the guidelines found in "Guidelines for Students with or Exposed to Communicable Diseases."

D. Evaluation of Occupational Exposure, Illness, and Injury

Students who are exposed to blood or bodily fluids become ill or injured as the result of a clinical assignment will be evaluated at the Howard University Student Health Center during the Center's normal operating hours. Students will be treated at the Howard University Hospital Employee Health Center after obtaining a referral and claim form from the Student Health Center. If the Employee Health Unit is closed, the student will be referred to the Howard University Hospital Emergency Department. The Student Health Center staff member will triage the student and write the following information on the referral form:

- Whether the student has had his/her series of Hepatitis B and tetanus vaccines, and any other laboratory information.
- The type of injury, when and how the injury occurred, and any pertinent information regarding the patient.

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When the Student Health Center is closed or in cases of dire emergency, the student should first contact the designated administrator at the work site and program clinical education coordinator. Any necessary emergency medical care shall be made available to the student through the regular procedures in effect at the Employee Health Unit or Emergency Department of the hospital, clinic, or other medical facility to which the student is assigned. The morning following discharge, the student must report to the Student Health Center for evaluation and clearance to return to the clinical site. The student should bring copies of discharge instructions and any other information describing the treatment that was rendered. The student will be referred to the Howard University Hospital Employee Health Unit or primary care provider for further management of the condition, if deemed medically necessary by the Student Health Center.

E. Standard/Universal Precautions

Standard/Universal precautions are the minimum safety and infection prevention practices that apply to **all** patient care, laboratory, or technical skills training experiences in any setting where healthcare or healthcare training is delivered. These practices are designed to protect healthcare professionals (HCP) and prevent the spread of infections to others. Students will receive training on standard/universal precautions, and occupational during the didactic and clinical phases of the program. The training will comprise of online OSHA seminars.

- **Hand hygiene** is critical to reduce the risk of spreading infection. Current CDC guidelines recommend use of alcohol-based hand rub for hand hygiene except when hands are visibly soiled (e.g., dirt, blood, body fluids), or after caring for patients with known or suspected infectious diarrhea, in which cases soap and water should be used.
- **Personal protective equipment (PPE)**
 - **Gloves** will be worn when there is risk of contact with or when handling blood, body fluid, tissues, or contaminated surfaces or equipment.
 - **Gowns** or plastic aprons will be worn if blood splattering is likely.

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- **Facial masks and/or protective eye wear** will be worn when performing/assisting procedures with a risk of body fluid or other hazardous material splashes or sprays. (e.g., when suctioning a patient with copious secretions).
- **Saliva** has not been implicated in HIV transmission; however, emergency mouth-to-mouth resuscitation should be minimized by using mouthpieces, resuscitation bags, or other ventilation devices accessible and available for use in areas where the need for resuscitation is predictable.
- **Sharp objects** should be handled in such a manner to prevent accidental cuts or punctures. Used needles should not be bent, broken, reinserted (recapped) into their original sheath, or unnecessarily handled. They should be discarded intact immediately after use into an impervious needle disposable box.
- All **needle stick accidents, mucosal splashes, or contamination of open wounds** with blood or body fluids should be reported immediately to the Student Health Service and Clinical Education Coordinator. If the Student Health Service is closed, please report to the Howard University Emergency Department for treatment. Students are required to complete a **Student Incident/Injury Report** form.
- **Blood spills** should be cleaned up promptly with a disinfectant solution such as 1:10 dilution of bleach, Sanimaster, phenol or alcohol.
- **Safe handling of potentially contaminated surfaces or equipment:**
 - Environmental cleaning: Areas in which patient care activities are performed will be routinely cleaned and disinfected at the conclusion of the activity as outlined by the laboratory course director/instructor.
 - Medical equipment safety. Reusable medical equipment must be cleaned and disinfected (or sterilized) according to the manufacturer's instructions. If the manufacturer does not provide guidelines for this process the device may not be suitable for multi-patient use.

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Compliance with all safety practices is not just a good procedure - it is a mark of your professionalism.

Persistent failure to observe and practice Standard Precautions may result in adverse/disciplinary action for unprofessional behavior.

F. Financial Responsibility

Each student must carry individual health insurance through the institution or through their personal insurance carrier. Students who suffer any occupational injury must carry their insurance card (University or personal) at all times and present it when receiving medical care. Your insurance will be billed for services at Howard University Hospital Emergency Department, Howard University Hospital, or other facilities as applicable. A student who receives an invoice for services related to any occupational injury must immediately forward the invoice to the program director for follow up.

Insurance coverage at Howard University is mandatory for all students. The health insurance fee is included in the University matriculation fee and coverage is provided by United Healthcare. All registered graduate students are automatically enrolled in the Student Health Insurance Plan ([Student Health Insurance Plan \(UHC\)](#)) unless proof of other ACA compliant plan can be provided.

Students covered by another insurance plan must complete the Waiver form ([Student Health Insurance Plan Waiver Form](#)). In addition, you will need your student ID number and detailed information about your current insurance policy.

Student need to be evaluated in the Student Health Center prior to receiving specialty referral services. A referral is needed for most specialists. Expenses will incur for medical treatment rendered outside of the Student Health Center for which no prior approval or referral is obtained.

Students with UHC-SR insurance plan do not need a referral with the following scenarios:

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- All mental health services (including prescribing medication for ADD/ADHD) are provided at the University Counseling Center location on campus.
- Due to a medical emergency. However, you must return to the Student Health Center for necessary follow-up care.
- When the Student Health Center is closed.
- When service is rendered at another facility during break or vacation periods.
- For medical care received when the student is more than 35 miles from campus.
- For medical care obtained when a student is no longer able to use the Student Health Center due to a change in student status, i.e. Maternity and Psychotherapy.
- Dependents are not eligible to use the Student Health Center; and therefore, are exempt from the above limitations and requirements.
- Dental Care provided at the College of Dentistry.