



Section 4: Health Policy, Disease Surveillance, and Clearances for Students

All Drexel University College of Medicine students who are enrolled full-time must carry comprehensive health protection meeting minimum specific benefit standards.

Documentation of immunizations and infection surveillance are required for all students enrolled in the College of Medicine for the duration of enrollment.

Students who are non-compliant with maintaining adequate health insurance or appropriate immunization and disease surveillance requirements may be barred from classes and/or clinical activities by being placed on an Administrative Leave of Absence until the deficiency is resolved. Non-compliance with College of Medicine Health Policy may also warrant a Report of Concern for Unprofessional Behavior.

The Office of Documentation and Surveillance is responsible for maintaining the health, immunization and surveillance records for students in the College of Medicine. (Contact info - phone: 215-991-8560 email: immsurv@drexel.edu). If you need assistance with finding a Primary Care Physician in the Philadelphia area, you may opt to find a physician in the Department of Family, Community and Preventive Medicine or the Department of Medicine by utilizing the Drexel University College of Medicine website <http://drexel.edu/medicine/Community-Engagement/Patient-Care/>

Please note that education and healthcare must be separate. While participating in clinical activities a student should not be supervised or evaluated by anyone who has provided healthcare to the student.

Health Insurance

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All Drexel University College of Medicine students who are enrolled full-time must carry comprehensive health protection meeting minimum specific benefit standards.

To satisfy the health insurance requirement, students may obtain coverage through the University-sponsored group plans or maintain equivalent health insurance through a plan administered elsewhere. For information, contact the Office of Student Financial Services at (215) 991-8268.

Students are responsible for any co-payments or the cost of uninsured services.

Monitoring and Documentation of Health Policy Requirements

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The university follows the recommendations of the CDC and the American College Health Association concerning required immunizations. Students are required to document immune status with appropriate titers which are obtained through the students' health care provider.

Documentation and monitoring of compliance with health policy requirements is conducted by the Office of Documentation and Surveillance. All student health and immunization records are maintained by the Coordinator of Documentation and Surveillance, who communicates directly with students.

Students requesting a copy of their transcript of immunization/titer documentation should submit a written request to the Office of Documentation and Surveillance (immsurv@drexel.edu) using their Drexel email. With the exception of affiliated academic campuses, immunization transcripts are sent directly to the student and not to programs or institutions.

Health and immunization documentation is maintained for current medical students. Health and immunization documentation is destroyed following graduation. Students are advised to maintain a copy of their own health/immunization documentation.

Disease Surveillance and Immunization Requirements

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Tuberculosis Surveillance Testing

Prior to matriculation (entering first year of medical school), all students must complete Tuberculosis baseline screening, with individual risk assessment, and testing. Testing will consist of a Two-Step Tuberculin Skin Test (TST) testing (PPD) or an Interferon Gamma Release Assay (IGRA). For students testing with a TST, the first step must be completed within 12 months of the second step AND the second step must be completed within two months of matriculation to medical school. If you have received the BCG Vaccine, you are still required to have tuberculosis surveillance testing. You may utilize Two-Step Tuberculin Skin Testing, or preferably, you may provide documentation (copy of test result/titer) of an Interferon Gamma Release Assay (IGRA) blood test completed within two months of matriculation. Of note, the BCG vaccine may result in a false positive tuberculin skin test while the IGRA does not. Thus, in the setting of BCG vaccination, the IGRA blood test has a higher specificity for exposure to or latent tuberculosis.

Students who have a positive PPD or a positive IGRA blood test must provide documentation of treatment for latent TB infection (LTBI) and a negative Chest X-ray (taken within one year of matriculation to Drexel University College of Medicine). Thereafter, while at DUCOM students with LTBI will be required to provide documentation of an annual Tuberculosis Self-Evaluation that has been reviewed by your healthcare provider. In addition to the matriculation requirements, all students are required to complete annual tuberculosis education, which will include information about TB exposure risks.

Symptom evaluation is required when exposure is recognized. For students with a negative baseline TB test and no prior TB disease or latent TB disease, a TST or IGRA is required when the exposure is identified. If negative, an additional TST or IGRA is required 8-10 weeks later.

If a student develops active disease, proof of appropriate Tuberculosis treatment is required. Students will also need documentation by their healthcare provider that disease is no longer active and the student is no longer considered a health risk to others before returning to any classes or clinical rotations. Thereafter, while at DUCOM students will be required to provide documentation of an annual Tuberculosis Self-Evaluation that has been reviewed by their healthcare provider.

Micro-Particulate Respirators

Students will be fitted for a micro particulate respirator prior to the beginning of the third year of medical school.

COVID-19 Vaccination

All medical students are required to be fully vaccinated against COVID-19 (this would include any recommended boosters). Documentation of vaccination must be submitted to the Office of Documentation and Surveillance at the time the vaccination is completed.

Influenza Vaccination

All medical students are required to be vaccinated **yearly** with the seasonal influenza vaccine. Documentation of vaccination must be submitted to the Office of Documentation and Surveillance by October 15th each year (Some clinical sites may have an earlier deadline). Failure to complete this requirement will result in the suspension of any clinical activities (i.e. Year 1/2 clinical skills hospital sessions or Year 3/4 clinical rotations) and may result in a Report of Concern for Unprofessional Behavior.

If there is a medical contraindication to influenza vaccination, documentation including the specific contraindication to vaccination is required from the student's health care provider.

Hepatitis B

All medical students are required to be vaccinated with a complete 3-dose Hepatitis B vaccine series. Documentation of receipt of the complete vaccine series must be submitted prior to matriculation. In addition, students must complete and submit **post-vaccination quantitative serologic testing** (Antibody to Hepatitis B Surface Antigen [anti-HBs]), documenting protective quantities of anti-HBs. If a student's post-vaccination quantitative anti-HBs titer is inadequate, the student must receive one additional dose of Hepatitis B vaccine, followed by quantitative anti-HBs serologic testing 1-2 months following receipt of the additional dose. Students whose titer remains inadequate following the single additional vaccine dose must receive two (2) additional vaccine doses (6 doses total) followed by repeat quantitative anti-HBs serologic testing 1-2 months after the last dose. If the anti-HBs titers remain negative after completion of two 3-dose vaccine series, a Hepatitis B Surface Antigen titer is needed.

Measles/Mumps/Rubella

All students are required to provide written documentation of vaccination with two doses of the Measles/Mumps/Rubella (MMR) vaccine; documentation must include specific dates of vaccine administration. Students without documentation of two MMR vaccine doses, must submit documentation of serologic testing indicating immunity for Measles, Mumps *and* Rubella (IgG). Students without required documentation of vaccination *or* inadequate or negative antibody titers must receive appropriate vaccinations (and submit documentation) prior to matriculation.

Tetanus, Diphtheria, Pertussis

Students must provide documentation of a single dose of the Tdap vaccination (regardless of timing of last Td booster). Td boosters are required every 10 years thereafter.

Varicella

Students must provide documentation of immunity to varicella by EITHER 1) submitting documentation of receipt of two doses of the varicella vaccine (documentation must include dates that each vaccine dose was administered) *or* 2) submitting documentation of serologic testing indicating immunity (IgG). If a student has a history of varicella disease but serology demonstrates negative antibody titers, the student must receive two doses of vaccine and provide documentation of vaccination prior to matriculation.

Recommended Immunizations

Meningococcal

Meningococcal vaccine is recommended prior to matriculating to medical school.

Hepatitis A

Hepatitis A vaccine is recommended prior to matriculating to medical school.

Follow-up for Student Immunization and Disease Surveillance Compliance

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The Office of Documentation and Surveillance will notify students who are non-compliant with immunization requirements. The Office of Documentation and Surveillance will provide the Associate Dean for Student Affairs with a list of students deficient in one or more areas of required infection surveillance or immunization. Students who are non-compliant with maintaining adequate health insurance or appropriate immunization and disease surveillance requirements will be barred from classes and/or clinical activities by being placed on an Administrative Leave of Absence until the deficiency is resolved. Non-compliance with College of Medicine Health Policy may also warrant a Report of Concern for Unprofessional Behavior.

Student Health Care

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If you need assistance finding a Primary Care Physician, you may find a physician in the Department of Family, Community and Preventive Medicine or the Department of Medicine by utilizing the Drexel University College of Medicine website <http://www.drexelmedicine.org>

Student Health Services are also provided at the Drexel Student Health Center located at 3401 Market Street, Philadelphia on main Drexel Campus.

** Students cannot receive healthcare from anyone who will supervise or evaluate them during medical school.*

Criminal Background Checks and Fingerprinting Requirements

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Students are required to complete a criminal background check, child abuse clearance, and the Pennsylvania Access to Criminal History (PATCH) upon matriculation and every 24 months thereafter while actively enrolled in the College of Medicine. Students are required to complete FBI fingerprinting through an approved vendor upon matriculation and every 60 months thereafter while actively enrolled in the College of Medicine.

If a student's background check reveals new information of concern or convictions not previously reported/reviewed (including judgments, found guilty by a judge or jury, pleaded guilty or no contest, received probation without verdict, disposition in lieu of trial, or Accelerated Rehabilitative Disposition (ARD)), it will be referred to the Senior Associate Dean for Student Affairs or their designee. The student will be asked to [submit a response to the adverse conviction and/or report](#). Additional documentation may be requested. If there are concerns related to the conviction, the issue will be referred to the College of Medicine Honor Court and/or Phase-appropriate Student Evaluation and Promotions Committee. The Student Evaluation and Promotions Committee will determine necessary sanctions up to and including dismissal from the College of Medicine.

Student Reporting Requirements

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All matriculated students must report any newly reported convictions (including judgments, found guilty by a judge or jury, pleaded guilty or no contest, received probation without verdict, disposition in lieu of trial, or Accelerated Rehabilitative Disposition (ARD) to the Senior Associate Dean for Student Affairs within 24 hours of conviction for review. The student will be asked to [submit a response to the adverse conviction and/or report](#).

Basic Life Support (BLS) Training

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Students are required to complete BLS training prior to the start of third year clerkships and every two years thereafter while actively enrolled in the College of Medicine.

Drug Testing Protocol

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Aside from impacting upon the personal and psychological integrity of the abusers, substance abuse may significantly impact the ability of medical students to administer safe, competent patient care. This policy impacts upon and augments the student's ability to maintain personal and professional integrity and facilitates the student's success both clinically and didactically. It promotes a healthy learning environment for the student and also enhances patient safety in the clinical setting.

Policy

This policy applies to all students and all applicants who have confirmed acceptance in the Undergraduate M.D. Program (the “Program”).

Any unlawful possession, use, manufacture or distribution of controlled or illegal substances or alcohol by any student in the Program while on campus or at a clinical site shall be considered substance abuse or chemical dependency and may constitute cause for termination from the program. Reporting to class or clinical assignments under the influence of such substances or alcohol is also prohibited. Students must also comply with all local, state or federal laws and regulations controlling the possession, manufacture, use or distribution of controlled or illegal substances and alcohol. All students must also comply with Drexel University policies on alcohol and illicit drug use.

In addition, there are circumstances in which students may need to take over the counter or prescribed medications that may impair their ability to function safely in the clinical environment and thereby endanger patients and self. As such, all students are responsible for being aware of the effect these medications may have on their ability to function safely in the clinical environment and are required to notify the Senior Associate Dean for Student Affairs (or their designee) upon entering a clinical educational experience if they have any concerns. Students cannot participate in clinical training if they are taking mood altering medications that impair their ability to function safely in the clinical environment. Failure to adhere to these policies will result in disciplinary action. In such circumstances, the student is encouraged to request medical leave from their studies.

Drug Testing

While enrolled in the Program, a student may be required to undergo drug or alcohol testing when:

1. They are placed in a clinical education training site whose policies require that rotating students undergo specific drug/alcohol testing prior to placement or during clinical rotations at the site. Students will be notified by the Office of Documentation and Surveillance of the need for drug testing and will provide information on the specifics of scheduling and details of sites where surveillance (drug testing) can be completed. It is the student’s responsibility to complete screening in a timely fashion. Students will not be permitted to begin clerkships until screening has been completed. Clinical sites will be notified when screening has been completed. Final results will be submitted to the Office of Documentation and Surveillance. Students with a positive test will be referred to the Director of Student Mental Health. If concerns remain, the student will be referred to Senior Associate Dean for Student Affairs.
2. The Senior Associate Dean for Student Affairs (or their designee) determines, through direct observation or reports from faculty, clinical supervisors, or other reporters, that there is reasonable suspicion that the student is impaired due to illegal drug or alcohol use, the use or misuse of prescribed or over the counter medications based upon, but not limited to:
 - Unusual or aberrant behavior
 - Physical symptoms
 - Patterns of abnormal or erratic behavior
 - Conviction for drug-related offenses
 - Being identified as the subject of a drug-related criminal investigation
 - Reliable information from independent sources
 - Evidence of drug tampering or misappropriation
 - Consistently discrepant daily drug counts
 - Accidents or illnesses caused by substance abuse
 - Impairment or intoxication in the clinical and/or didactic setting
 - Patterns of absenteeism and/or lateness
 - Alterations in student clinical and/or didactic performance that may not be attributed to other causes
 - Following a work-related injury or illness
 - Observation of poor judgment or careless acts which caused or had the potential to cause patient injury, jeopardize the safety of self or others or resulted in damage to equipment

3. A faculty member who suspects possible substance abuse by a student reports the suspicious behavior immediately to the Senior Associate Dean for Student Affairs. Once the Senior Associate Dean is notified that a student has been suspected of violating the substance abuse policy, the student will be referred for mandatory evaluation through a designated/approved program and/or mandatory testing through a designated testing laboratory in accordance with College of Medicine policies. The Senior Associate Dean has the authority to temporarily suspend the student from clinical education experiences pending the final results of any mandated evaluations or laboratory tests.

4. A student convicted of violating any federal, state or local law or regulation pertaining to the manufacture, possession, sale, use or distribution of a drug or alcohol or misuse of prescribed or over the counter medications must report this conviction to the Senior Associate Dean for Student Affairs within five days of the conviction. Failure or refusal to comply with any aspect of the substance abuse policy is grounds for disciplinary sanction, including dismissal from the College of Medicine. Examples of noncompliance include, but are not limited to, refusal to submit to immediate drug and alcohol testing, tampering or alteration of specimens, attempts to submit the samples of another person as the student's own, and failure to appropriately complete associated program or testing laboratory documents.

Testing Procedure

Drug and alcohol testing required by the Program will be conducted utilizing the following measures:

- The student must be tested at a laboratory designated by the Program.
- The student will sign the chain of custody forms and any other documents provided by the testing laboratory.
- The test shall screen for the use of common controlled substances and any other controlled substances that are suspected of being abused or used by the student.
- Urine, serum, hair and saliva analysis or a combination of these testing methods may be utilized.
- The student will disclose any prescribed or over-the-counter medications as well as any dietary habits that could modify testing results as requested. The student must fully comply with the testing laboratory's methods and procedures for collecting samples.
- If the accuracy of a positive test is disputed by the student, the student may request a retesting of samples by the laboratory.
- Substance use is verified if either: (i) the positive test result is not disputed or (ii) the student-requested retest is positive.
- See above policies and procedures for management of students with positive drug tests.

Confidentiality

The requirement that a student be tested as well as the test results will remain confidential and disclosed only to those individuals within Drexel University or an affiliated clinical site with a need to know or as required by law or regulation.

Sanctions

If there is suspicion of impairment in an enrolled student due to directly observed behaviors, reported behaviors, and/or positive drug testing, the Senior Associate Dean for Student Affairs will refer the student for necessary laboratory testing and evaluation(s) by the Pennsylvania (PA) Physician's Health Program. When a student is required to complete an evaluation by the PA Physician's Health Program, the College of Medicine will require compliance with the recommended evaluation and/or treatment plan as defined by the PA Physician's Health Program. The Senior Associate Dean has the authority to temporarily suspend the student from clinical education involving patient care pending the conclusion of any required evaluation and/or student judicial process.

Compliance

Failure or refusal to comply with any aspect of the substance abuse policy will be reported to the Honor Court and/or Student Evaluation and Promotions Committee for possible disciplinary action in accordance with the Student Handbook.

Voluntary Self-Disclosure

Students can self-report to the PA Physician's Health Program. Students can also seek out additional counseling and treatment resources that are available by consulting with the Senior Associate Dean for Student Affairs.

Students who voluntarily self-disclose a substance or alcohol abuse problem to the Senior Associate Dean prior to a positive drug/alcohol test result and who are willing to enter into and complete an appropriate program of treatment will not be reported by the Senior Associate Dean to the Student Evaluation and Promotions Committee for disciplinary action or sanction. Such a student, after consultation with their health care provider, may request a medical leave of absence from the Program in order to participate in a treatment program. At the end of the leave of absence, if the student wishes to re-enter the program the case will be reviewed by the Senior Associate Dean and the Promotions Committee to determine if the student will be permitted to re-enter the program.

Reentry into the Academic and Clinical Environment

A student who has taken an approved leave of absence from the Program due to substance abuse may be eligible to reenter the Program if any necessary medical clearances have been received and if their return has been approved by the PA Physician's Health Program. Before reentry into the MD program, a contract will be established between the Program and the recovering student; the contract will include any requirements and/or stipulations upon return and/or any specific monitoring requirements. A student in recovery who is permitted to reenter the MD Program will comply with the conditions of readmission delineated in a signed contract of program reentry.

Counseling, Psychiatric Evaluation and Treatment

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There are several resources for mental health care in the College of Medicine and the University. In the College of Medicine, Diane Gottlieb, M.D., Director of Student Mental Health and Jill Adaman, Ph.D., Clinical Psychologist, work together as a team to provide evaluation and treatment including individual and group counseling therapeutic care, and stress management. All services provided to students are confidential and free of charge. Drs. Gottlieb and Adaman can be reached Monday through Friday.

Disability Insurance

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Students in the College of Medicine are covered by a disability insurance policy funded through required student fees. The policy provides disability income insurance, which pays a monthly benefit in the event that a student becomes disabled. The plan is portable after graduation. While in medical school, students are insured under a group insurance policy issued by The Guardian Life Insurance Company of America. The link to information about Disability Insurance is: <https://app.hsac.com/drexel/>.

Exposure to Infectious and Environmental Hazards

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(see below for additional information)

Mandatory educational sessions on universal precautions for blood-borne pathogens are provided at the orientations for entering students and for students as they enter the core clinical clerkship year of studies. Information about safety and response to exposure to infectious agents or hazardous substances is presented during the orientation programming for entering students and at entry into the second and third years of the curriculum. Each student is required to complete a review of the laboratory safety presentation and manual on-line and complete the on-line survey for documentation. Information is also provided during course orientations for those specific courses in which students may be exposed to infectious agents and/or toxic substances, and in the student manuals for those courses.

Tuberculosis:

All students are fit-tested for N-95 respirators and trained in appropriate donning and doffing of masks to prevent exposure to tuberculosis through contact with known or suspected cases of tuberculosis. DUCOM follows the Mary 2019 updated CDC recommendations for health care workers including:

- Baseline TB screening with an individual risk assessment and symptom evaluation;
- TB testing with an IGRA or TST for personnel with a known exposure to TB who have no documented prior TB disease or LTBI;
- No routine serial TB testing at any interval after baseline in the absence of a known exposure or ongoing transmission;
- Symptom evaluation and chest radiograph for all personnel with a newly positive test result, with follow-up as indicated;
- Encouraging treatment for all personnel with untreated LTBI unless contraindications exist
- Annual symptom screening for personnel with untreated LTBI
- Annual TB education for all health care personnel.

COVID -19

- Guidelines regarding medical student campus processes and/or delivery of patient care will be in accordance with national, local and College of Medicine current guidelines and policies. Guidelines will be disseminated to students on an ongoing basis with updates as necessary.
- Students must wear a surgical mask at all times in any clinical environment. When performing patient care, eye protection (faceshield, goggles, safety glasses with side protection) should also be worn, routinely. An N95 mask can be added in any situation that is considered higher risk.
- If in contact with a person or patient who tests positive for COVID, contact Drexel Student Health at 215-220-4700 and use the Medical Student Affairs Emergency Textline.
- Students with any possible COVID-related symptoms **must**:
 - Contact Drexel Student Health at 215-220-4700 right away, regardless of your location for an appointment. Drexel Student Health is responsible for student excusal needs. Drexel Student Health will also be responsible for contract tracing outside of the clinical environment. Should it be necessary, your clinical site will be notified, and appropriate tracing will be done.
 - Text the Medical Student Affairs Textline right away. You will be excused from your clinical rotations as needed.

Blood and Body Fluids Exposure

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Definition of Occupational Exposure

- Exposure to blood, tissues, visibly bloody body fluids or other body fluids to which universal precautions apply (i.e. semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, peritoneal fluid, pericardial fluid, and amniotic fluid)
- Modes of exposure:
 0. Percutaneous injury: Penetration of skin by needle or other sharp object that was in contact with blood, tissue, visibly bloody fluids or other body fluids as listed above.
 1. Mucous membrane exposure: Contact of mucous membranes (eyes, nose, or mouth) with blood, tissue, visibly bloody fluids or other body fluids as listed above.
 2. Non-intact skin exposure: Contact of non-intact skin (e.g. chapped, abraded, dermatitis, open wounds) with blood, tissue, visibly bloody fluids or other body fluids as listed above.
 3. Bite: A human bite sustained by a healthcare worker from a patient, co-worker or visitor.

If you believe you have had an Occupational Exposure:

1. WASH.

- Skin exposures (intact or non-intact): Immediately wash the area with antibacterial soap and water.
- Small wounds and punctures: Cleanse thoroughly with alcohol-based skin disinfectant.
- Mucous membrane exposure: Flush the area with copious amounts of water.

2. REPORT IMMEDIATELY. Report the incident to *all* of the following:

- Your immediate supervisor (resident and/or attending)
- Director of Medical Education at affiliate site
- Office of Student Affairs (Medical Student Affairs Emergency Textline: 215-991-8888)
- Fill out the Appropriate Incident Report
- **NOTE: Reporting should not prevent you from seeking immediate medical care.**

3. SEEK **IMMEDIATE** MEDICAL EVALUATION. **DO NOT WAIT:**

- Third and Fourth year students: Go immediately to the Employee Health Department or the Emergency Department of the hospital where you are working. During regular working hours [usually 8 am-5pm Mon-Fri] you will usually be evaluated in the Employee Health Department or its equivalent. During other hours evaluation will usually be in the Emergency Department. However, students should consult the exposure policy of the specific affiliate hospital for specific instructions. Many of these affiliate policies can be found on the DUCOMpass app under the “Blood and Body Fluid Exposure” tab; if your site is not listed there you should report to the Emergency Department of your hospital.
- First and Second Year students: Go immediately to the Emergency Department of the nearest hospital.
- Identify yourself as a medical student with an exposure.
- Have the name and medical record number of the patient involved in the exposure, if available.
- Baseline testing and immediate treatment may be necessary for exposure to fluids or tissue from patients with known or suspected HIV or Hepatitis infection. If it is determined that HIV post-exposure prophylaxis is indicated, antiretroviral medications should be started as early as possible after an exposure (ideally *within one to two hours*). **DO NOT WAIT** to seek medical evaluation.
- Provide your insurance information and **do not** allow yourself to be submitted to Workman's Compensation.
- Obtain appropriate referrals as required by your insurance company (it will be too late if you wait for Workman's Comp to turn you down). You are responsible for knowing your insurance company's policies regarding provider notification.
- Retain your Explanation of Benefits (EOB) when you receive it from your insurance company. Always keep copies for your records.
- If you carry the Drexel University College of Medicine sponsored health insurance, there should be limited personal liability for payment related to exposures if you have submitted billing invoices and statements as requested.

4. FOLLOW-UP.

- Get copies of all testing, assessments, and recommendations (This should include results of the source patient's testing).
- Follow-up care (including follow-up testing, monitoring of medications, etc.) can be coordinated through Drexel University student health, your own physician, or through the hospital where the exposure occurred. Regardless of where you elect to have care rendered, your medical insurance will be billed and you will be responsible for co-payments or services that are not covered.

All HIV testing and information processing in Pennsylvania hospitals will adhere to PA Act 148 as well as applicable federal laws.

The DUCOM Deans for Student Affairs are available to assist you in a confidential manner. **Medical Student Affairs Emergency Textline: 215-991-8888**