

The University of Arizona College of Medicine – Tucson
Students with Bloodborne Pathogens Policy

Category:	General Educational Policies	Policy Name:	Students with Bloodborne Pathogens
COM-T Phase:	All Phases of MD Program	Policy Status:	Final - TEPC Approved
Responsible Unit:	All Units	Effective Date:	12/17/2021
Relevant LCME Standard(s):	12.8 Student Exposure Policies/Procedures	Revision Dates:	N/A
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Purpose and Summary

This Policy provides the guidelines for maintaining patient safety and establishing reasonable accommodation, confidentiality, and respect for a student who is a carrier of, or has, a bloodborne infection that poses a risk to patients and other healthcare providers. This applies to all students across the entire MD Program.

Definitions

Disability Resource Center (DRC) is the University office designated to assess and determine reasonable accommodations for students with qualifying disabilities (visit drc.arizona.edu).

Expert Review Panel is a group comprised of the Medical Director for Hospital Epidemiology, Infection and Control from Banner Health; the Executive Director of the University of Arizona Disability Resource Center (DRC); the Medical Director of Campus Health or their designees. The Medical Director of Campus Health or their designee will be the head of this panel. At their discretion, the Medical Director may invite other parties (e.g. University Occupational Health or comparable role) to be on the Expert Review Panel. The Expert Review Panel convenes when needed; i.e. there are no regular meetings of the Expert Review Panel each month.

Reasonable Accommodations are adjustments or modifications to practices, guidelines, or procedures that do not fundamentally alter the nature of the medical education program or place an undue burden on the institution(s). Reasonable Accommodations are determined by the DRC.

Exposure-prone Procedures include those procedures in which the blood of a Health Care Worker (HCW) could be introduced into a body cavity, tissue or blood vessel, or contact non-intact skin of a patient. Examples of these procedures may include but are not limited to:

- Open Abdominal Surgery (any)
- Cardiothoracic Surgery (any, including open lung biopsy or resection)
- Open Spine Surgery

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- Obstetric/Gynecologic Surgery (any open procedure and those involving hand guided sharps also to include forceps delivery, cone biopsy, scalp electrode placement or administration of local anesthesia to cervix)
- Open Orthopedic Procedures
- Plastic Surgery (major cosmetic procedures including breast reduction, abdominoplasty or thigh plasty)
- Transplantation Surgery
- Trauma Surgery including Ophthalmic Trauma
- Open surgical procedures > 3 hours duration in which glove change is anticipated or routinely performed

Policy

Medical students infected with one or more bloodborne pathogens that could pose a risk to patients and other healthcare providers upon matriculation or within two business days of diagnosis occurring after matriculation, must notify the Medical Director of Campus Health. The Medical Director of Campus Health will notify and refer the student to the Expert Review Panel. The student must not perform Exposure-prone Procedures without guidance from an Expert Review Panel.

The Expert Review Panel will review the student's circumstances in a manner compliant with applicable laws, regulations, and recommendations from authoritative agencies on the practice of health care workers with communicable infectious diseases (e.g., HIV, HCV, HBV).

The Expert Review Panel will use Occupational Safety and Health Act (OSHA) national guidelines to determine any restrictions on the student's activities in the healthcare environment; develop an educational program that meets the requirements of the academic program; and ensure that the student meets COM-T [Technical Standards](#) with or without reasonable accommodations.

The Expert Review Panel will determine any necessary reasonable accommodations for the student in the academic and clinical learning environments. Consistent with DRC practices, the DRC representative will memorialize the determination in a letter. The student is responsible for providing this letter to the COM-T Office of Curricular Affairs.

The Office of Curricular Affairs will coordinate with COM-T's administrative units to ensure that changes to the educational program are made for the student accordingly. If clinical rotation changes are required, these adjustments will be made in accordance with the [Student Assignments to Instructional Sites](#) policy.

The record of the review and any recommended accommodations will be managed in a manner that is consistent with applicable federal and state laws and regulations.

If the student disagrees with the decision of the Expert Review Panel, the student may request an independent review by the [University's ADA/504 Compliance Officer](#).

Students with qualifying medical conditions or disabilities are protected from discrimination, harassment, and retaliation. Any discriminatory conduct should be reported as specified in the

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University of Arizona Nondiscrimination and Antiharassment Policy or the COM-T Professionalism Mistreatment Reporting guidelines.

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Conflict of Interest Statement

A Conflict of Interest may occur when a member of the Expert Review Panel has familial ties, a significant and consistent mentorship (academic/research mentor), a business relationship, a healthcare provider relationship, or otherwise perceives a conflict of interest to a student under review. Members who identify a Conflict of Interest must recuse themselves from participating in the review proceedings and any decisions for the education program as it pertains to the impacted student. Members must recuse themselves by notifying the Medical Director of Campus Health, head of the Expert Review Panel.

Related Policies and Guidelines

[Technical Standards](#)

[Student Assignments to Instructional Sites](#)

[Effects of Infectious and/or Environmental Disease or Disability Medical Student Learning](#)

[Student Occupational Exposure Policy](#)

[Non-Discrimination and Anti-Harassment](#)

[Professionalism Program for reporting Mistreatment, Discrimination, or Harassment](#)