



## Professional Student Compliance Policy

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Policy Category:	Student Affairs
Policy Applies To:	Students in the Doctor of Osteopathic Medicine (DO) Program
Policy Contact:	COM Compliance Coordinator or COM Registrar

### References and Related Policies:

- See also: Michigan State University Policy for Healthcare Professional Student Immunizations
- See also: Evaluation of Student Performance and Academic Standing

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### PURPOSE

To protect the health and safety of MSUCOM students, healthcare professionals, patients, and communities they serve, the College of Osteopathic Medicine (COM) requires all medical students to comply with health and safety regulations established by Michigan State University (MSU) and affiliated clinical partners.

Students are responsible for maintaining compliance with all college, medical, regulatory, and university requirements throughout the program. Lapses in compliance may affect academic standing, progression, or eligibility for clinical experiences.

### POLICY AND PROCEDURES

Students must provide proof of vaccination and immunity to specific communicable diseases as outlined in the **MSU Healthcare Professional Student Immunization and Vaccination Policy**. MSUCOM uses a third-party immunization system to manage and confirm compliance status. Students must also complete required training modules addressing professional conduct, research ethics, patient safety, and regulatory standards detailed below.

Students must:

- Monitor their compliance status regularly throughout the program.
- Respond promptly to automated reminders and notifications from the compliance system(s).
- Maintain current contact information in the system.
- Complete all annual or expiring items before expiration.

**Failure to receive notifications does not excuse non-compliance.** Students are responsible for independently maintaining and completing their compliance status and deadlines.

Students must maintain health insurance without lapses throughout the program. Students are responsible for all costs associated with medical compliance, including vaccinations, titer tests, and medical screenings. The College does not assume financial responsibility for any related expenses.

### Medical Requirements

This list outlines the required immunizations, titers, and screenings students will maintain throughout the program. All documentation must be uploaded to the third-party system prior to the start of anatomy.

### **Required Immunizations and Titers**

- Measles, Mumps, & Rubella. (MMR- Titer testing required)
- Varicella. (Chickenpox-Titer testing required)
- Hepatitis B. (Reactive or positive Titer test required)
- Tetanus, Diphtheria, & Pertussis. (Tdap)
- Tuberculosis (TB) screening.

### **Recommended Immunizations**

- Polio
- COVID-19

### **College Degree Requirements**

To maintain the professional standards expected of healthcare personnel, students are required to complete the following:

- Criminal background checks – at matriculation, prior to clerkship, and as directed
- Urine drug screenings – at matriculation, prior to clerkship, and as directed
- Health Insurance Privacy and Portability Act (HIPAA) training – **annual requirement**
- Bloodborne Pathogen (BBP) training – **annual requirement**
- Professionalism attestations and agreements
- Proof of continuous health insurance coverage throughout the program

### **University Requirements**

Michigan State University requires completion of Responsible and Ethical Conduct of Research (RECR) training as part of institutional research compliance expectations. RECR training introduces core principles of research integrity, including ethical conduct of research, protection of human subjects, and responsible data practices.

The College monitors completion of required RECR training and is a condition of continued enrollment and participation in applicable academic or research activities. Students may also be assigned additional University-directed compliance training as required.

### **Regulatory Requirements**

The State of Michigan requires Educational Limited License holders to complete the following trainings, which are integrated into the MSUCOM curriculum:

- Implicit Bias Training: Spring OMS-I, Osteopathic Patient Care II
- Opioid and Controlled Substance Use Training: Spring OMS-I, Osteopathic Patient Care II
- Human Trafficking Training: Summer OMS-III, OST 601: Transition to Clerkship

### **Annual Requirements**

The following must be completed every year by college-designated deadlines:

- Tuberculosis (TB) screening

- Influenza (Flu) vaccination
- Health Insurance Portability and Accountability Act (HIPAA) Training - Online module
- Bloodborne Pathogen (BBP) Training – Online module

**Transition to Clerkship Requirements** (Must be completed before beginning third year):

- An additional Urine Drug Screen (UDS) separate from the matriculation screen)
- An additional criminal background check (separate from the matriculation screen)
- Basic Life Support (BLS) Certification\*
- Advanced Cardiovascular Life Support (ACLS) Certification\*

\*Must be maintained through graduation. Students are responsible for recertification costs due to program extensions or leaves of absence.

## **LAPSE OF COMPLIANCE**

Procedures for managing compliance lapses during preclerkship and clerkship, including notification timelines, corrective actions, and consequences, are detailed below.

### **Preclerkship Lapse of Compliance Procedure**

At any point in the process outlined below, if a student successfully restores compliance, the progression of further steps is halted. Once compliance is restored, no additional escalation actions related to that compliance item will occur.

#### **1. Automated Expiration Reminder Notifications**

Pre-Clerkship students receive automated email notifications regarding upcoming compliance item expirations. These messages are generated by the designated compliance tracking system and are intended to provide advance notice.

Automated reminders are sent at the following intervals:

- Sixty (60) days prior to the compliance item expiration date
- Thirty (30) days prior to the compliance item expiration date

#### **2. Compliance Coordinator Notification at Seven (7) Days Prior to Expiration**

If a compliance item remains outstanding seven (7) days prior to its expiration date, the Compliance Coordinator will issue a direct notification to the student's university email address.

This notification serves as an urgent reminder and includes the following elements:

- Identification of the specific compliance item approaching expiration
- The exact expiration date and remaining time to restore compliance
- A clear statement of the consequences, including potential written compliance citations
- A call for immediate action, an urgent meeting with the compliance coordinator, directing the student to complete the requirement and submit documentation without delay

### **3. Dean Notification and Consultation**

If a lapse in compliance occurs, the Compliance Coordinator will notify the Associate Dean of Student Affairs regarding the student's lapse in compliance.

Upon notification, the Student Affairs team will coordinate a meeting involving the student and a preclerkship Dean to review the circumstances contributing to the lapse of compliance and establish a plan for restoring compliance.

### **4. CGPI Submission and Written Compliance Citation**

If compliance is not re-established following the preclerkship Dean consultation, the matter will be formally submitted to the **Common Ground Professional Initiative (CGPI)**.

In addition, a written compliance citation (letter of professional misconduct) may be issued and placed in the student's official academic file at the preclerkship Dean's sole discretion.

## **Clerkship Lapse of Compliance Procedure**

At any point in the process outlined below, if a student successfully restores compliance, the progression of further steps is halted. Once compliance is restored, no additional escalation actions related to that compliance item will occur.

### **1. Automated Expiration Reminder Notifications**

All students receive automated email notifications regarding upcoming compliance item expirations. These messages are generated by the designated compliance tracking system and are intended to provide advance notice.

Automated reminders are sent at the following intervals:

- Sixty (60) days prior to the compliance item expiration date
- Thirty (30) days prior to the compliance item expiration date

### **2. Compliance Coordinator Notification at Seven (7) Calendar Days Prior to Expiration**

If a compliance item remains outstanding seven (7) days prior to its expiration date, the Compliance Coordinator will issue a direct notification to the student's university email address.

This notification serves as an urgent reminder and includes the following elements:

- Identification of the specific compliance item approaching expiration
- The exact expiration date and remaining time to restore compliance
- A clear statement of the consequences and escalation if a lapse of compliance occurs
- A call for immediate action, an urgent meeting with the compliance coordinator directing the student to complete the requirement and submit documentation without delay

### **3. Dean Consultation and Clinical Site Suspension**

If a lapse in compliance occurs, the Compliance Coordinator will notify the Clerkship team of the student's lapse in compliance. Upon notification, the Clerkship team will contact the student to inform them of a clinical site suspension until compliance is restored. A meeting involving the student and a Clerkship Dean will occur to review the circumstances contributing to the lapse of compliance and establish a plan for restoring compliance.

#### **4. CGPI Submission and Written Compliance Citation**

If compliance is not restored following Clerkship Dean consultation, the matter will be formally submitted to the **Common Ground Professional Initiative (CGPI)**.

In addition, a written compliance citation (letter of professional misconduct) may be issued and placed in the student's official academic file at the Clerkship Dean's sole discretion.

#### **5. COSE Review and Hearing**

If a student has a lapse in compliance that prevents completion of required clerkship curriculum activities, or if there is a documented pattern of recurrent lapses in compliance, the matter may be referred for review by the **Committee on Student Evaluation (COSE)**. In rare circumstances, this review may proceed to a formal COSE hearing. A COSE hearing may result in academic or disciplinary outcomes, up to and including dismissal from the program.

### **Clinical Partner Compliance Requirements**

#### **Partner Requirements**

Clinical partners require MSUCOM to verify that all students in clinical settings are immunized according to CDC recommendations for healthcare providers. Requirements are subject to change based on partner agreements, CDC guidelines, university policy, or healthcare professional standards.

#### **Immunization Exemptions**

**MSUCOM does not grant immunization waivers or exemptions.** Students seeking exemptions for medical or religious reasons must submit requests directly to the hospital(s) or clinical site(s) where they will be placed. Each healthcare partner reserves the right to determine whether to grant vaccination exemptions.

**Important:** Exemption approval is not guaranteed. If a clinical partner denies an exemption request:

- The student's clerkship schedule may be modified to place them at an alternate site that accepts exemptions
- **The student may experience a delayed clerkship start or limited rotation options. Students without approved exemption documentation will not be permitted to participate at sites requiring the vaccination. Failure to meet clinical participation requirements may halt progression through the program and make timely program completion untenable and may result in a Committee on Student Evaluation (COSE) hearing**

#### **Student Support and Resources**

- MSUCOM website's Compliance page from the Office of Student Affairs
- Access to staff for questions and assistance by emailing [com.compliance@msu.edu](mailto:com.compliance@msu.edu)
- Campus Health Services staff at the Olin Health Center for questions and assistance