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**Subject: Teaching Clinic Protocol Violation Policy**

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## **1. Purpose**

The purpose of this policy is to outline violations of protocols in the University Teaching Clinic at the Natural Care Center (NCC), and describe the procedures and sanctions for remediation of the violations.

## **2. Policy**

Sections 2.1-2.7 of this policy outline the main categories of potential violations of protocols in the University Teaching Clinic. The list of examples under each subheading is not exhaustive of every possible violation. Violations marked with an asterisk (\*) are generally considered more significant and may have more severe consequences.

### **2.1 HIPAA**

Any breach in confidentiality as outlined in the NCC Clinic Intern Handbook, to include but not limited to:

- Leaving patient/client files or any Protected Health Information (PHI) unattended or exposed (physically or electronically)\*
- Leaving copies of receipts out
- Leaving scheduling system open on the computer
- Repeated use of Personal (non-MUIH) email to contact patient/client\*
- Removing patient/client files from the NCC\*
- Inappropriately making photocopies of client charts or disclosing patient/client information (such as handing over a chart to another student) without first getting the signed Disclosure Request Form.\*
- Discussing patient/client in bathrooms and/or public areas\*

*Note: All HIPAA breaches are reported by the University HIPAA Officer to Health and Human Services (for an incident impacting over 300 lives) and are stored for six (6) years in the University reporting structure.*

### **2.2 Attire & Grooming**

Failure to comply with NCC Dress & Grooming Standards (Policy 8000 available at: <https://my.muih.edu/forms-policies-2/university-policies>)

- Students cannot participate in a clinic shift unless they meet the *Dress and Grooming Standards*.
- Students will be removed from clinic until in compliance with *NCC Standards*.
- Repeated failure to adhere to these standards is treated as a violation of the Code of Student Conduct and may result in expulsion from clinic for the remainder of trimester and failure of the course.

## **2.3 Scope of Practice**

Scope of practice for each modality is determined by the licensing board for the state of Maryland or national certifying body:

- Acupuncture and Chinese Herbs: <https://health.maryland.gov/bacc/Documents/law%202005.pdf>
- Yoga Therapy: <https://www.iayt.org/page/IntroScope>
- Nutrition: <http://mdrules.elaws.us/comar/10.56.01.01>

Violations include:

- Practicing outside of scope of practice\*
- Practicing without supervision or outside of NCC, including providing services, treatment, and/or recommendations not approved by Clinic Supervisor and/or not taught in the curriculum\*
- Failure to clinically document consult progress note within a timely manner

## **2.4 Professional Conduct**

Professional conduct is outlined in the NCC Clinic Intern Handbook. Violations include, but are not limited to:

- Inappropriate use of cell phone during clinic shift
- Inappropriate voice level
- Asking the Observer/Partner/Secondary to act in a way that is inappropriate or secretive\*
- Failure to comply with the reasonable directives of University officials\*
- As an Observer/Partner/Secondary, stepping out of bounds set by primary for consult
- Failure to promptly and appropriately report child or elder abuse
- Failure to follow proper procedures to report, in a timely fashion, clinic issues including breaches of protocol such as missing files, inter-personal issues, and scheduling concerns.

## **2.5 Client Relationship**

Failure to comply with who can and cannot be a patient/client as outlined in the NCC Clinic Intern Handbook.

## **2.6 Scheduling**

Inappropriate scheduling as outlined in the NCC Clinic Intern Handbook, including but not limited to:

- Scheduling outside of allotted times
- Scheduling outside of assigned rooms
- Scheduling more appointments than allowed per shift
- Scheduling a secondary where there is no primary
- Scheduling young children (< 5 years) or special population without permission of Clinic Supervisor.\*

*Note: For Yoga Therapy, clients must be adults.*

## **2.7 General**

Additional violations of teaching clinic protocol include:

- Failure to re-set/clean treatment room for next practitioner
- Leaving personal belongings, including food/drink, in Core Room or Treatment Rooms
- Failure to utilize Personal Protective Equipment (PPE) as directed or other health and safety procedures.

*Note: No food or drink other than water is allowed in the Treatment Rooms.*

## **3. Procedures**

### **3.1 Documentation of Violations**

When a clinic supervisor or NCC staff member observes or becomes aware of a possible protocol violation, they complete Part 1 of the [Teaching Clinic Verbal Warning and Written Documentation form](#) and submit the form to the relevant academic department's clinic administrator. The administrator then meets with student, completes Part 2 of the form including determination of responsibility and sanctions. In the case of more significant violations (marked with an asterisk), the administrator also submits the form to the department chair and Dean of Students and Director of Student Affairs.

Violations marked with an asterisk (\*) or multiple violations generally lead to higher-level sanctions.

### **3.2 Sanctions**

All levels of sanctions include written documentation. Possible sanctions includes:

1. Verbal warning and written documentation
2. Written paper (500-word paper on the topic related to the violation and reflection describing how the experience impacts peers, faculty, and clients/patients). Remedial training, if applicable
3. Clinic Suspension (amount of time determined in consultation with Academic Department Chair and Director of Student Affairs)
4. Referral to Student Affairs for conduct action per the Code of Student Conduct

### **3.3 Tracking**

The clinic administrator for each academic department will provide a monthly summary of the number and type of violations using the [Summary Report of Violations](#) form. The Director of the NCC will use the forms to identify common issues and determine if additional training is necessary.

### **3.4 Storage of Records**

Records of violations will be stored according to the University's Record Retention Schedule:

<b>Academic Warning or Probation</b>	Notice of academic action related to academic non-performance	7 years after date of incident
<b>Academic Suspension or Expulsion</b>	Notice of academic action related to academic non-performance	Indefinitely
<b>Academic integrity code violation</b>	Notice of violation of academic integrity policies including sanction	7 years after date of incident
<b>Disciplinary action records</b>	Grade of program actions, notice of sanctions related to personal conduct	7 years after date of incident
<b>HIPAA breaches</b>	Disclosing protected health information (PHI) without consent or knowledge	7 years after date of incident for University record

## **4. Approval and Revisions**

Approved November 24, 2020 by Provost & Vice-President Academic & Student Affairs, Christina Sax, Ph.D