

PARKLAND COLLEGE HEALTH PROFESSIONS POLICY AND PROCEDURES



Subject: Student Health, Immunization, Drug, and Background Procedures
Program(s): CNA, EMS, LPN, MAS, MSG, NUR, OTA, XRA, RTT, DHG, VTT and SUR

HP Policy Committee Approval Date: Spring 2012

Effective Date: Summer 2012

Last Reviewed Date: Summer 2012

Revised Date: 2018, 2020, 2021

POLICY:

Parkland College (PC) Health Professions is committed to maintaining a drug-free workplace and academic environment in compliance with the Federal Drug Free Workplace Act of 1988 and in Accordance with Parkland College Policy 3.24 Drug-Free Workplace.

For students in the Health Professions programs listed above, for the health and safety concerns of the patients, clients and students, students must be able to participate in clinical education activities in full control of their manual dexterity and skills, mental faculties, and judgment. The presence of alcohol and/or drugs, lawfully prescribed or otherwise, which could interfere with student's judgment or motor coordination in a healthcare setting poses an unacceptable risk to patients, faculty, other students, the College and affiliated clinical agencies (i.e. hospitals, skilled nursing facilities, health systems, and other healthcare organizations involved with student education and with which the College has a clinical affiliation agreement in place). The College recognizes its responsibility to provide for a safe academic environment for College students, faculty, and staff, as well as a safe clinical setting for students, faculty, patients and employees of affiliated clinical agencies. For the foregoing reasons, the College has adopted this policy to further the following interests.

1. Through a third-party vendor, health, immunization, drug, and background information on all students in facilities that have these requirements or standards are collected.
2. Required Student Health Records are considered a part of the student record, and are therefore subject to the PC policy regarding student records.
3. Student Health Records may not be copied by Parkland College except when requested by the clinical facility for evidence of compliance with requirements.

PURPOSE:

1. Comply with clinical contracts and standards, and
2. Protection of the Public (patients)
3. Determination as to whether the student is qualified to enter and care for patients at the clinical facilities,
4. Ensure students can perform all the essential qualifications
5. Protect the integrity of student health records.

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BACKGROUND:

The conduct standards for Healthcare Professionals and students are higher than those of the ordinary student or citizen because of the inherent responsibilities assumed by their role with patients, and the trust the public places on their profession to do no harm. Therefore, adherence to all applicable laws, standards, and professional codes of ethics is required.

Student Health Records are presented as evidence of *compliance* with Illinois Department of Public Health (IDPH) rules and the contracts with the clinical facilities. These records are not primary source records and are not intended to be used as such. Castle Branch is the agent approved to collect information from the consumer reporting agencies. Castle Branch contracts with the labs to do the testing and the Medical Review Office.

DEFINITIONS:

1. Student health records includes: physical exam, immunizations dates, titers, and waivers, drug testing results, background testing results, TB testing, and copies of BLS cards.
2. LS- Basic Life Support
3. CB – Castle Branch, which is the company Parkland, hires to document, screen, and approve all clinical requirements
4. HP – Health Professions
5. TB – Tuberculosis
6. “Drug testing” means the scientific analysis of urine, and one or more of the following: blood, breath, saliva, hair, tissue, and other specimens of the human body for the purpose of detecting a drug or alcohol as determined appropriate by the Medical Review Officer (MRO).
7. “Pre-placement testing” means drug testing conducted on all students prior to engaging in a clinical experience and/or providing direct patient care at an affiliated clinical agency if the agency or the program requests such testing. All students are determined to be admitted conditionally until all tests are received and clear.
8. “Reasonable suspicion testing” means drug testing conducted on students because individualized and objective evidence exists to support the conclusion that student (1) has engaged in the use of alcohol, illegal ~~or~~ legal drugs, including medical marijuana, in violation of applicable policies, laws, and regulations; or (2) appears to be impaired.
9. “Illegal drug” for purposes of this policy means (a) any drug not legally obtainable; (b) any drug which is legally obtainable but has not been legally obtained; (c) any prescribed drug not being used for the prescribed purpose, in the prescribed dosage and manner, or by the person for whom it was prescribed; (d) any over-the-counter drug being used at a dosage other than the recommended dosage, or being used for a purpose other than the purpose intended by the manufacturer; and (e) any drug being used in a manner that is not consistent with established medical practice standards. Examples of illegal drugs include, without limitation, stimulants, depressants, narcotics, analgesics and hallucinogenics
10. “Impaired” means that a person’s mental or physical capabilities are reduced below their normal levels.
11. MRO- Medical Review Office.
12. IDPH- Illinois Department of Public Health



13. Essential Qualifications: Students matriculating in and graduating from a Parkland College Health Professions programs must be able to meet the Essential Requirements of the academic program and must not pose a threat to the well-being of patients, other students, staff, or themselves. As an incoming student you will need, at a minimum, the following types of skills and abilities and will need to maintain and demonstrate these abilities throughout the program.

I. Drug, Alcohol and Background Check Policies and Procedures

A. Prohibited Conduct and Duty to Notify of Charges/Convictions

1. Under no circumstances should students participate in program courses or clinical experiences while he/she is impaired.
2. Under no circumstances should students manufacture, use, possess, sell or distribute illegal drugs in violation of applicable federal and state laws and/or applicable Program and College policies, including the College Code of Conduct.
3. Under no circumstances should students purchase, consume or possess alcohol in violation of applicable state laws and/or applicable program and College policies, including the College Code of Conduct.
4. A violation by any student of applicable federal or state laws or regulations pertaining to the manufacture, use, possession, sale or distribution of an illegal drug, or a violation by any student of applicable state laws pertaining to the purchase, consumption or possession of alcoholic beverages is strictly prohibited. Students have an affirmative duty under this policy to report any criminal convictions or plea agreements that are related to the manufacture, use, possession, sale or distribution of an illegal drug, or the purchase, consumption or possession of an alcoholic beverage. Such violations, if substantiated, may result in disciplinary action, up to and including dismissal from the program or college, in accordance with established College disciplinary policies and procedures.
5. Students who violate any provision of this policy will be subject to disciplinary action, up to and including dismissal from the program.

B. Pre-Placement Background Check, Drug and Alcohol Testing

Students participating in a program must agree to submit to pre-placement testing in programs that require pre-placement background checks, drug or alcohol testing. Students will be notified of pre-placement screening upon conditional acceptance to the program through the Health Professions website and in the conditional acceptance letter packet. Parkland College has a zero-tolerance drug policy for students enrolled in Health Professions.

Pre-placement drug testing will be coordinated through a qualified vendor under contract. The cost of drug testing for students shall be collected through course fees. Students shall be provided with a list of drugs for testing by the vendor.

1. Students will be notified that official acceptance to a Health Professions program includes a drug screen and background check.
2. Consent is obtained from each student to allow Castle Branch Check to collect this information at their Web site as the student (applicant) signs in to create their confidential file.

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3. Positive pre-placement drug tests will be confirmed by an additional test of the original sample through an official Medical Review by the Castle Branch team.
 4. The vendor (Castle Branch) will notify the student and the Health Professions Dean of a confirmed positive through the student's secure site.
 5. A student having a confirmed positive drug test, including medical marijuana, will have an opportunity to have their MD provide evidence to the MRO through the CB representative. If the MRO accepts the evidence and clears the student, they will be cleared to attend clinical. If the MRO does not clear the student, there will be no opportunity for retest, and the student will be removed from the program.
 6. A student's failure to submit to pre-placement drug testing, or any attempt to tamper with, contaminate or switch a sample will result in dismissal from the program, and potentially the College. The student will not be eligible to apply for any Health Profession program in the future.
 7. All reports will be kept strictly confidential, and shall be used, maintained, and disclosed by the College only as permitted by and in strict compliance with all applicable federal and state laws and regulations pertaining to confidential and protected health information and student records.
 8. No information from the reports will be revealed to any other person, except a person whose duty requires him to pass on the transaction in relation to which the report was ordered.
 9. The student's information will be shared only with those who have a legitimate need, permissible purpose, and authorization.
 10. Student records are presented as evidence of compliance with IDPH rules and contracts with the clinical facilities. These records are not primary source records and are not intended to be used as such, therefore cannot be copied for any reason except to verify completeness when audited by the clinical facilities.
 11. Students that have an official State of Illinois Department of Public Health Medical Marijuana card should present the card prior to official acceptance to the program director. Many clinical facilities follow federal guidelines and do not accept medical marijuana cards but reasonable effort will be made to find alternative clinical placement that will still meet the needs of program accreditation and required competencies. Failure to present the card may result in an interruption of education and training due to lack of placement opportunities. The student will work with their program director and Dean of Health Professions to determine if clinical placement can be found prior to acceptance to the program. Clinical schedules and clinical facilities are unique to each program. Program Directors and the Health Profession Dean will determine if a clinical placement meets requirements of the program. Students will only be placed at scheduled clinical facilities according to the schedule set by the program and the clinical site.
- C. Results/Authorization to Attend Clinical:**
1. The results of the background check and the drug testing are posted in the student's secure site by Castle Branch.
 2. The Faculty Chair or designee will review all Clinical requirements and document any clearance necessary under custom roster notes.

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3. The Faculty Chair or designee will review all records and prepare any clinical reports required by the clinical facilities to show evidence of compliance.
4. The Dean will review all background checks for clearance.
5. The Dean will receive notification of a failed drug screen. If a student has a positive screen, the Dean will contact the student and program director regarding clinical eligibility.
6. The Program Director will notify the lead course faculty (course lecturer) of student status, i.e. who is/is not approved for clinical due to an expired requirement or failed screening.
7. The lead course faculty member or program director will notify clinical instructors if a student is not authorized to be at clinical.
8. It is the program director and lead course faculty's responsibility to monitor the course roster to ensure that only those who are cleared for clinical, attend class, lab or clinical.
9. Authority to clear a student and allow them to register comes from the Dean.
10. Under no circumstances can faculty take a student's word that they are cleared for clinical.
11. The clinical and course faculty have full authority and responsibility to remove any student from clinical who is not on the roster as being cleared.
12. No students will attend clinical in a program who are not cleared in all areas by the established deadlines. During the acceptance period for students, students will be dropped from all program courses if not cleared or meet the established deadlines for health records.
13. The Dean will authorize any student not cleared for clinical, for whatever reason, to be dropped from all program courses. An administrative hold will be placed on the student's account to prevent re-registering until clear.
14. For an incomplete health record, on first offense, once the student is cleared, the student will be notified by the program director and the Dean will lift the Administrative hold.
15. Students that have additional occurrences of incomplete health records will follow the Program Handbook and guidelines of the program the student is enrolled.
16. While in the program, if a student is accused of an offense listed on the IDPH list of disqualifying conditions, the student will be allowed to stay enrolled in the clinical course until and if there is a conviction. If the student is convicted of the offense, the student will be removed from clinical and the program.

D. Results/ Adverse Reports/Disqualifying Conditions:

1. All adverse action taken will be based on the list of disqualifying conditions on Illinois Department of Public Health (IDPH) and when applicable Illinois Healthcare Worker Background Check Act (NAS 111 students).
2. If there are adverse reports received regarding any disqualifying condition, the Dean will notify the student and the program director so that the student is removed from the course.
3. Any positive drug screens that are not cleared by the Medical review Officer contracted by Castle Branch will result in the student forfeiting their seat in the program until the next admission cycle.



E. Student Rights Regarding Adverse Reports

1. Students will be informed:
 - a. In writing of the disqualifying condition and that they are not approved to continue in that course or the program by the Dean.
 - b. Of the name, address, and telephone number of Castle Branch (CB) and will be informed that CB is not able to explain why the decision was made to disqualify.
 - c. That they have the right to a copy of the report of the disqualifying condition.
 - d. To contact the Illinois State Police regarding the accuracy of the background check, and Quest Diagnostics regarding the accuracy of the drug tests.
 - e. They may dispute the decision to remove them from the course and the program, but must first successfully dispute the information received from the Illinois State Police or Quest Diagnostics.

F. Student Has No Waiver/ has applied for a waiver:

1. If the student does NOT have a waiver for the listed disqualifying condition, they are not qualified to attend any clinical courses, or the program for which they are registered. Therefore, they will be dropped from any courses in the major and the program, however, they may continue to attend any general education courses from which they are registered.
2. CNA student can apply for a waiver through IDPH.
3. XRA students can apply for a waiver through The American Registry of Radiologic Technologists.
4. Waivers must be written for the specific program the student is entering.
5. In some cases waivers may NOT be obtained from IDPH. In such a case the student should see a lawyer. It is the student's responsibility to pursue a waiver.
6. Once a waiver is obtained, the student may re apply for the program (if allowed by program rules) following all program procedures during the next admission cycle, and clinical placement will be attempted.

G. Student's right of appeal:

1. The student will have the right to challenge the results using the established Parkland College grievance process, after they have settled the dispute with the Illinois State Police or Quest Diagnostics.
2. Students have a right to present additional medical evidence from their physician to the Medical Review Office following a positive drug screen, following the procedures outlined by the Medical Review Office. However, if the MRO does not clear the student after medical evidence is presented, there is no further challenge or repeat test allowed, and the student must reapply at the next admission cycle.

H. Reasonable Suspicion Drug and Alcohol Testing

1. Reasonable suspicion drug testing may be conducted when individualized and objective evidence exists to support the conclusion that a student (1) has engaged in the use of



- alcohol, illegal or legal drugs; in violation of applicable policies, laws, and regulations; or (2) appears to be impaired.
2. Impairment must be confirmed by two clinical facility instructors or employees.
 3. Evidence of the possibility of a student's use of alcohol, illegal or legal drugs, or impairment may be provided by any individual, including employees of affiliated clinical agencies. Reasonable suspicion drug testing will be coordinated through the office of Health Professions. The determination of whether drug testing is warranted under the facts and circumstances shall be made by the Dean of Health Professions or Faculty Chair in consultation the Vice President of Academic Services, and the Dean of Students. The cost of initial drug testing shall be borne by the college. The student shall be provided with a list of drugs for testing as may be required by either the program or an affiliated clinical agency. Evidence of impairment for marijuana use includes but is not limited to symptoms of the employee's speech, physical dexterity, agility, coordination, demeanor, irrational or unusual behavior, negligence or carelessness in operating equipment or machinery, disregard for the safety of the student or others, involvement in any accident that results in serious damage to equipment or property, or carelessness that results in any injury to the student or others.
 3. Students will be given two hours to report for a drug screen. Carle Occupational Medicine will conduct reasonable suspicion screening. If the student is outside of Champaign Urbana for clinical, a location more conveniently located to the clinical site will be chosen and will be determined by the Dean of Health Professions.
 4. Students not reporting in the two-hour time frame will be considered to have a failed drug screen.
 5. Direct observation collections will be authorized when the student attempts to tamper with the specimen or there is evidence the sample has been tampered with prior to collection. Direct observation procedures at Carle Occupational Medicine will follow the Illinois Department of Transportation guidelines.
 6. Positive reasonable suspicion drug tests will be confirmed by an additional test of the original sample as requested by the student at the college's expense.
 7. The Dean of Health Professions will notify the student and the Vice President of Academic Services and Vice President of Student Services of a student's confirmed positive drug test.
 8. Students having a confirmed positive drug test could be subject to disciplinary action, up to and including dismissal from the program, in accordance with established Program and Departmental disciplinary policies and procedures.
 10. Student failure to submit to reasonable suspicion drug testing, or any attempt to tamper with, contaminate or switch a sample will result in disciplinary action, up to and including dismissal from the Program.
 11. Students may be subjected to reasonable suspicion testing whenever on Parkland premises, while operating college equipment, or while in a Parkland course recognized course, lecture, lab, or clinical.
 12. The testing facility will be selected by the college and assist with safe transportation for the student as needed.

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13. Parkland also reserves the right to test students involved following an incident involving Parkland equipment, workplace/clinical safety violation, both on or off campus.

II. Health Records:

A. General Guidelines

1. Parkland College will use the Castle Branch as the agent approved to collect information from the consumer reporting agencies, and as the system for archiving and checking health records.
2. Consent is obtained from the student to allow Castle Branch to collect this information at their web site as the student (applicant) signs in to create their confidential file.
3. Students retain the right to direct access their Health Information account at Castle Branch for the remainder of their life.
4. Once submitted, the records are used by Parkland College in regards to compliance with clinical contracts.
5. If the student has a lapse or is readmitted, the student will be required to complete the new health records and physical exam if the lapse has been more than ONE year.
6. If the student has a lapse or is readmitted, the student will be required to complete a background check and drug screen if the lapse has been more than ONE year.
7. Once in Parkland College's possession, under no circumstances are records copied for any use other than as evidence of compliance with the clinical contracts. If clinical contracts require health record documentation, the student should provide the documents directly to the clinical site by downloading forms from their personal account in Castle Branch. Because Parkland is not the primary source, the college cannot email or send student's health records. It is permissible to state a date of completion to clinical sites.
8. Student's health records are accessible to the student indefinitely once the student has paid the fee for Castle Branch. Parkland archives accounts at Parkland as students are not in the program but records are still accessible to the student through the student's Castle Branch account.

B. Clinical Requirements:

1. Clinical requirements are determined by affiliation agreements with clinical partners.
2. Clinical requirement standards may vary from semester to semester depending in facility requirements.
3. Each semester the college forwards changes/standards to Castle Branch for entry to the system and monitoring as directed.
4. Students will be notified of changes to requirements as soon as the college has the process in place for collecting the documentation.

C. Religious and Medical Waivers for Vaccinations

1. Declinations and exemptions can be submitted but clinical placement or progression in the program cannot be guaranteed.
2. Declination forms should be submitted prior to the official acceptance in the program to avoid possible interruption in the student's education.
3. Students must follow the Parkland process for requesting approval of a medical or religious exemption for a vaccination.

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- a. Students should contact the Dean of Health Professions to request a religious or medical exemption for a vaccination via the student's Parkland email account. Please send request to ExemptionsHP@parkland.edu Please list EXEMPTION REQUEST in the subject line of the email.
 - b. The Dean will send the student the related policy regarding health records and vaccinations along with the form to be completed by the student, healthcare provider and or religious leader. Only the Parkland form will be accepted.
 - c. The student will submit the completed form with required information directly to the Dean from the student email account.
 - d. The applications for approval will be determined on a case-by-case basis.
 - e. Additional supportive documents or information from the student, health care provider or religious leader may be requested.
 - f. The approval will be for the duration of the program only; if a student enters another Health Professions program, a new approval must be sought.
 - g. Students will be notified of decision through their Parkland student email account.
4. Students who submit false documentation or knowingly submit false information in pursuit of this exemption are in violation of program and Health Professions Code of Conduct, Program Code of Conduct, and related handbook statements.
 5. Students should understand that in the event of an outbreak or pandemic concern, the clinical facilities may temporarily exclude unvaccinated students. Being excluded from clinical experiences and time, may cause interruption in the student's educational progress.
 6. Some clinical facilities may require an additional form, additional personal protective equipment or training if exemptions or declinations are approved.
 7. Beliefs based on social, political, or economic philosophies as well as personal preferences are not considered religious beliefs.
 8. Clinical facilities may not accept declinations or exemptions for stated requirements. Reasonable effort will be made to find clinical placement that will still meet the needs of program accreditation and required competencies. The student will work with the program director and Dean of Health Professions to determine if alternative clinical placement can be arranged. Clinical schedules and clinical facilities are unique to each program. Program Directors and the Health Profession Dean will determine if a clinical placement meets requirements of the program. Students will only be placed at scheduled clinical facilities according to the schedule set by the program and the clinical site.

IV. Healthcare Professions Licensure

Students in the Health Professions Programs shall be familiar with applicable legal and ethical requirements set forth in Illinois state licensure laws and regulations pertaining to healthcare professions and occupations.

Illinois healthcare professions and occupations licensing boards may initiate an investigation upon receipt of information about any practice that may violate any provision of the licensing

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statute or any rule or regulation of the board. Boards generally have the power to: (i) refuse to issue a license; (ii) refuse to issue a certificate of renewal of a license; (iii) revoke or suspend a license; and (iv) invoke other such disciplinary measures, censure, or probative terms against a licensee if the board finds that an applicant or licensee:

1. Has given false information or has withheld material information from the board in procuring or attempting to procure a license;
2. Has been convicted of or pleaded guilty or nolo contendere to any crime which indicated that the applicant/licensee is unfit or incompetent to practice his/her occupation or that the applicant/licensee has deceived or defrauded the public;
3. Has a mental or physical disability or uses any drug to a degree that interferes with his/her fitness to practice his/her occupation;
4. Engages in conduct that endangers the public health;
5. Is unfit or incompetent to practice his/her occupation by reason of deliberate or negligent acts or omissions regardless of whether actual injury to the patient is established; or
 - a) Engages in conduct that deceives, defrauds, or harms the public in the course of the program.

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Email to the Student Regarding Disqualifying Condition

To: Student Name
From: Kim Pankau
Dean, Health Professions

Re: Disqualifying Condition

Date:

Castle Branch, 1845 Sir Tyler Drive, Wilmington, NC 28405, TEL: 888-66607788 has notified us that you have a disqualifying condition according to the Illinois Healthcare Worker Background Check Act. Castle Branch did not make the adverse decision, and is not able to explain why the decision was made to categorize this condition as disqualifying.

You have a right to a copy of the report and this must be requested in writing to the Dean of Health Professions, L 119, or kpankau@parkland.edu within 60 days.

Your disqualifying condition is as follows: _____
(See attached)

As a result of receiving this information, we request that you notify your Program Director immediately if you have a waiver for this disqualifier. If you have a waiver, Parkland will make an attempt to enroll you in another clinical site if one is available, however, there is no guarantee this will be possible.

If you do not have a waiver for the listed disqualifying condition, you are not qualified to attend any clinical courses, or the program for which you are registered. You will be dropped from any courses in your major and the program; however you may continue to attend any general education courses for which you are registered.

If you feel this report is not accurate, you have a right to dispute the accuracy of the report directly with the Illinois State Police (background check), or Quest (drug test). You may also dispute the decision to remove you from the clinical site, but you must successfully dispute the accuracy of the background check or the drug check first.

Should you obtain a waiver in the future, you may reapply to the program (if allowed by the program rules) following all program procedures and clinical placement will be attempted.

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Dear Parkland College Health Professions student,

Parkland College contracts with multiple clinical facilities in the State of Illinois. Many of our clinical partners require pre- clinical background checks and drug screens. With the exception of Veterinary Technology, Dental Hygiene and Fire Service Technology, all Health Profession students will be screened after conditional acceptance to the program.

In addition to routine pre-clinical screening, a complete health record will be maintained and continually updated through the duration of the program. Policies and information regarding the health record will be found with conditional acceptance materials and on the website.

Students that have an official State of Illinois Department of Public Health Medical Marijuana card should present the card prior to the program director as soon as conditionally accepted. Many clinical facilities follow federal guidelines and do not accept medical marijuana cards but every effort will be made to find clinical placement that will still meet the needs of program accreditation and required competencies. The student will work with the program director and Dean of Health Professions to determine if clinical placement can be found prior to acceptance to the program. Failure to present the card may result in an interruption of education and training due to lack of placement opportunities.

Additional information can be found in the Student Health, Immunization, Drug, and Background Procedures policy located on the Parkland Health Professions website. If you have any questions regarding drug screens or the background check, please contact your program director or me as early as possible.

Thank you and thank you for choosing a Parkland College Health Profession career! Good luck with your studies!

Kim Pankau

Dean of Health Professions

kpankau@parkland.edu

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Parkland College Health Professions
COVID-19 Vaccination Exemption Request

Name: _____ Student ID: _____
Program: _____
Phone Number: _____ E-mail Address: _____

Medical Exemption

Recognized Contraindications to COVID-19 vaccine. Please select one:

- ___ Severe, life threatening allergic reaction after previous dose of COVID-19 vaccine or vaccine component.
- ___ Physician discretion for patients with history of epilepsy or Guillain-Barre Syndrome.

I certify that my patient has the above contraindication, and request medical exemption from the COVID-19 vaccine.

Healthcare Provider Signature: _____ Title: _____
Provider email and contact phone number: _____

Religious Exemption

Religious exemptions may be granted if (i) the individual holds sincere religious beliefs which are contrary to the practice of vaccination, (ii) complete this form, and (iii) provide the required documentation to support the exemption as needed. I am attesting that I have a sincerely held religious belief against being vaccinated for COVID-19. Please state what is unique about this vaccination and the religious belief that guides your objection to receiving the vaccination.

Church/Religious affiliation: _____

Religious Leader signature: _____

Religious Leader email and contact phone number: _____

I understand and assume the risks of non-vaccination. I understand that as I am not vaccinated, in order to protect my own health and the health of the community, I will comply with assigned COVID-19 testing requirements or other preventative measures as directed by clinical partner agreements.

Student Signature

Date

NOTE: The Health Professions Dean is the designated single reviewer for all requests. Students will be contacted via Parkland student email accounts upon review completion. Please read all details of the Health Professions health record policy regarding vaccination status and clinical placement.