

Campus Oversight Procedure for Health Services
California State Polytechnic University, Pomona (Cal Poly Pomona)

I. Overview/Purpose

Executive Order 814, Policy on University Health Services, effective July 1, 2002, requires the President or a designee to ensure appropriate oversight of all University health services.

- The President has designated the Vice President for Student Affairs to provide this oversight, hereafter called the campus oversight officer.

The purpose of this procedure is to provide standards and guidelines for the provision of health services to students, employees, and visitors by all campus entities, including the Student Health Service, the Athletic Department, all academic programs and auxiliary organizations. The intent is to insure compliance with relevant California State University policy, privacy practices, and federal, state and local laws.

Executive Order 877, Designation of Health Care Components for Purposes of the Health Care Portability and Accountability Act of 1996 (HIPAA), effective April 14, 2003 requires the President or a designee to promptly designate health care components that are covered by HIPAA, to insure compliance with appropriate legislation and to promptly notify the Office of the Chancellor of those components.

- The President has designated the Vice President for Student Affairs and the Vice President for Administrative Affairs as responsible for the implementation of this procedure.

II. Scope

This procedure applies to all Cal Poly Pomona departments/programs and auxiliaries that provide health services. Nothing in this procedure shall supercede California State University Trustees' Policy or applicable Executive Orders.

- This procedure would not apply to first aid administered on campus, except by departments or programs that otherwise are considered being health service entities.

III. Definition of Health Services

Health services shall be defined as the assessment and treatment or referral for treatment of medical conditions provided by a department or program of Cal Poly Pomona or one of its auxiliaries. Immunization administration and health promotion are considered health services.

- As of July 1, 2003 the following Cal Poly Pomona entities are identified as health care providers:
 - Student Health Services
 - Athletics Department
 - The Department of Kinesiology and Health Promotion

IV. Standards/Guidelines

- A. Each health care provider's role and responsibility are determined by their professional skills, competence, and credentials.
- B. Determination of provider qualification will be guided by state law, CSU Classification and Qualification Standards, National Practitioner Data Bank review, professional references and accreditation agency guidelines.
- C. Each health care provider:
 1. Must possess and maintain a valid and relevant California professional license.
 2. Must meet the requirements/minimum qualifications set forth by the California State University Board of Trustees and applicable Executive Orders.
 3. Must practice within the scope of his/her licensure, certification, and training.
 4. Must meet the standards of practice for the service area
 5. Unlicensed individuals providing health care (e.g., athletic trainers) must do so under the supervision of a physician or other appropriately licensed provider. All arrangements for supervision must be approved by the campus oversight officer.
- D. Where there are applicable standards, each area will establish or implement and comply according to the professional group or accreditation body specific to their area.
- E. Where appropriate, the provider of a service shall be licensed, certified, and trained within the applicable guidelines for the licensure or certification.

- F. Each entity providing health care must maintain written policies and procedures shall be maintained that define the scope of services and basic guidelines of practice.
- G. All campus entities will ensure a clean, safe, functional and effective environment to reduce the risk of environmental spread of disease.
- H. Campus entities should consult with the Offices of Risk Management and General Counsel to ensure adequate coverage for insurance and liability coverage.
- I. The Medical Record:
1. Each entity providing health care shall maintain appropriate medical records for all care delivered.
 2. Information shall be considered confidential and secured in compliance with state and federal laws (California Information Practices Act {Civil Code §1798.1 et seq} & Confidentiality of Medical Information Act {Civil Code § 56 et seq})
 3. Contains documentation in a given area and shall meet the guidelines of the applicable profession as defined by an appropriate oversight organization or accreditation organization for that area. At minimum, the documentation shall include:
 - Name of the recipient (patient)
 - Date
 - Location
 - The health service provided
 - Name and signature of the provider (s)
 4. Medical records need to be maintained and stored for a minimum of 7 years from the last patient visit and consistent with the California medical records requirements.
- J. Adverse outcomes
- Any adverse outcome of a health service provided by Cal Poly Pomona shall be reported as soon as possible to the campus Risk Manager and to the campus oversight officer. An outcome should be considered adverse if:
1. The client suffers physical, personal, or financial loss as the result of an action or inaction.
 2. The client is harmed physically, psychologically, or financially by an assessment, treatment or referral.
 3. The client must seek treatment elsewhere due to an unplanned outcome of a service provided.

4. The client is apt to file a claim against the University.

V. Oversight

- A. In addition to the campus oversight officer, an oversight committee shall provide assistance and consultation for the implementation of this procedure. This oversight committee shall include the responsible individual from each department providing health care plus the university risk manager.
- B. The campus oversight officer shall endeavor to identify and report to the CSU campus health care providers who are engaged in HIPAA covered transactions.
- C. The health oversight committee shall review and insure compliance with campus security procedures as required in Section XII of Executive Order 814.
- D. All health service areas shall engage in an ongoing process of review and improvement of its offerings.
- E. Each health service area shall engage in a regular review of its operation and its compliance with standards of operation and relevant campus, California State University, governmental, and ethical guidelines.
- F. Each health service area shall assess the timeliness and appropriateness of its services.
- G. Each health service will submit annual reports as required to the President or designee and to the Chancellor's Office.

VI. Coordination of health services between Student Health Services and the Department of Athletics.

- A. Student athletes are regular students of the University and are therefore eligible for medical services from Student Health Services (SHS). The Department of Athletics (Athletics) provides additional medical services to student athletes, including but not limited to services from contracted physicians and Cal Poly Pomona athletic trainers.
 - 1. SHS provides to Athletics, at no charge, group Athletic Physical examinations prior to their participation in a specific sport.

- B. As Athletics and SHS share a mutual interest in the well-being of student athletes, the following coordinating procedures and policies will apply:
1. When referring a student athlete to SHS for diagnosis and treatment, insure that an appropriate consent to disclose medical information is initiated and is signed and dated by the student athlete which will permit the exchange of information between the trainer, coach and SHS physicians and other clinical staff as is necessary for the effective care of the student.
 2. Medical care provided to student athletes by coaches or trainers shall be documented and maintained as addressed in Athletic Department Procedures. When appropriate, a legible copy of such documentation, which identifies the student by name, the date of treatment, the treatment provided and signed by the individual providing the medical care shall be provided to SHS for inclusion in the medical record of the student athlete to insure continuity of the medical treatment.
 3. SHS medical care provided to regular Athletics staff members will be provided and reimbursed consistent with the University's procedure on Workers' Compensation for initial evaluation and care of an on-the-job injury or illness, for immunizations for infectious diseases, such as Hepatitis B, or for limited medical examinations relating to job function, such as a DMV Class B Drivers' License examination.
 4. Student Trainers who are regular students of the University are eligible for all SHS services, subject to payment of the mandatory Student Health Services Fee. In those instances when Athletics requests a special service and agrees to pay student costs for such a service, such as Hepatitis B Immunization, such requests should be made in advance of the desired date of service.

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