

Oregon Project Firstline: Improving HAI Prevention Education Through State Rule

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Background

- As part of Project Firstline outreach, we contacted healthcare education leaders of the 17 Oregon community colleges
 - Directors of Nursing
 - Chairs or Deans of Allied Health
 - Directors of Health Sciences
 - Directors of Dental Assisting Program
- Throughout 2022, we held virtual meetings with 7 community colleges to discuss landscape of infection prevention education contents, introduce Project Firstline, and offer educational resources

Oregon Administrative Rule 409-030

- During a meeting with a Dean of Nursing, we learned that all Oregon health profession students must meet the standards as written in Oregon Administrative Rules (OAR) 409-030.
- Oregon law defines "rule" as "any agency directive, standard, regulation or statement of general applicability that implements, interprets or prescribes law or policy, or describes the procedure or practice requirements of any agency."

Oregon Health Authority

Health Policy and Analytics - Chapter 409

Division 30

HEALTH PROFESSION STUDENT CLINICAL TRAINING ADMINISTRATIVE REQUIREMENTS

409-030-0100

Purpose

These rules (OAR 409-030-0100 to 409-030-0250) establish standards for administrative requirements for health professional student placements in clinical training settings within the state of Oregon. The purpose of these rules is to mitigate inconsistencies that currently exist across clinical placements; to promote efficient solutions to reduce costs for students, health profession programs and clinical placement sites; and to ensure patient, clinical staff and student safety. These rules pertain to credentials that students must obtain and requirements that clinical placement sites may set.

Statutory/Other Authority: ORS 413.435

Statutes/Other Implemented: ORS 413.435

History:

OHP 24-2019, amend filed 11/06/2019, effective 11/15/2019

OHP 8-2013, f 9-30-13, cert. ef. 7-1-14

Which healthcare students are included?

- The OAR includes a complete list of all health professional disciplines

409-030-0130

Health Professional Disciplines

(1) Except as provided in OAR 409-030-0150, these rules apply to students of the following health professions:

- (a) Audiologists, as defined in ORS 681.205;
- (b) Clinical laboratory science specialists, including medical technologists, medical laboratory scientists, and laboratory assistants, as defined in ORS 438.010;
- (c) Dental assistants, as defined in ORS 679.010;
- (d) Dental hygienists, as defined in ORS 679.010;
- (e) Dental therapists, as defined in ORS 679.603;
- (f) Dentists, as defined in ORS 679.010;
- (g) Dieticians, as defined in ORS 691.405;
- (h) Emergency medical services providers, as defined in ORS 682.025;
- (i) Hemodialysis technicians, as defined in ORS 688.635;
- (j) Marriage and family therapists, as defined in ORS 675.705;
- (k) Medical personnel (trained medical office and ancillary healthcare personnel who perform clinical tasks such as taking vital signs, preparing patients for examinations, or recording medical histories of patients, administrative duties, and other duties);
- (l) Medical imaging practitioners and limited x-ray machine operators, as defined in ORS 688.405;
- (m) Nurses, including registered nurses, practical nurses, advanced practice nurses, nurse practitioners, nursing assistants, medication aides and any other assistive nursing personnel licensed or certified under ORS 678.010 to 678.445;
- (n) Occupational therapists and occupational therapy assistants, as defined in ORS 675.210;
- (o) Optometrists, as described in ORS 683.010 to 683.310.
- (p) Pharmacists and pharmacy technicians, as defined in ORS 689.005;
- (q) Physical therapists, physical therapist aides, and physical therapist assistants, as defined in ORS 688.010;
- (r) Physician assistants, as defined in ORS 677.495;
- (s) Physicians (Medical/Osteopathic and Naturopathic), as defined in ORS 677.010 and 685.010;
- (t) Podiatrists, as defined in ORS 677.805;
- (u) Professional counselors, as defined in ORS 675.705;
- (v) Psychologists, as defined in ORS 675.010;
- (w) Regulated social workers, as defined in ORS 675.510;
- (x) Speech-language pathologists and speech-language pathologist assistants, as defined in ORS 681.205; and
- (y) Surgical technologists (allied health professionals under the supervision of a surgeon who are trained in advanced sterile techniques and theories and facilitate safety throughout the operative procedure);
- (z) All other health-related disciplines not listed above that fall under the regulatory authority of the Oregon Health Licensing Office established in ORS 676.560-625 and ORS 676.990-992.

(2) These rules do not apply to students engaged in a field of study that is not explicitly listed in section (1). Academic institutions and clinical placement settings should individually negotiate the terms of placement for students not covered by these rules. Clinical facilities may choose to require that such students follow the standards set forth in these rules but are not required to do so.

What healthcare facility types are included?

- The OAR also includes a complete list of all clinical settings that must meet the requirements as stated

409-030-0140

Clinical Settings

(1) Except as provided in OAR 409-030-0140 section (2) and 409-030-0150, these rules apply to the following clinical facilities hosting health professions students in the disciplines described in OAR 409-030-0130:

- (a) Ambulatory care settings, including but not limited to clinics, private practices, Federally Qualified Health Centers, and primary care homes;
- (b) Ambulatory surgical centers, as defined in ORS 442.015;
- (c) Funeral establishments, as defined in ORS 692.146;
- (d) Hospice, as defined in ORS 443.860;
- (e) Hospitals and emergency departments, as defined in ORS 442.015;
- (f) Long term care facilities, as defined in ORS 442.015;
- (g) Residential care facilities, as defined in ORS 443.400; and
- (h) Skilled nursing facilities, as defined in ORS 442.015;
- (i) Other sites not listed above where health care is delivered.

(2) In addition to the exceptions provided in OAR 409-030-0150, these rules do not apply to the following clinical facilities hosting health professions students in the disciplines described in OAR 409-030-0130 for a clinical placement:

- (a) Chiropractic, acupuncture, and massage therapy clinics that are independent and not associated with a clinical placement setting listed in OAR 409-030-0140(1).
- (b) Federal facilities, including Department of Veterans' Affairs facilities, Indian Health Service facilities, Tribal clinics, and federal prisons. Standards for clinical placement in federal facilities are set at the federal level.
- (c) Health management or administration departments.
- (d) Public elementary and secondary schools (grades K-12).
- (e) Radiosurgery clinical placements. The Nuclear Regulatory Commission sets requirements for students involved in radiosurgery.
- (f) State prisons and correctional facilities.
- (g) Oregon State Hospital.

(3) Completion of the administrative requirements in these rules only ensures administrative clearance for students. Clinical placement settings shall make all final clearance and placement decisions.

HAI-related topics included in OAR 409-030

- Immunization standards
- Tuberculosis screening standards
- Bloodborne pathogen training that is compliant with the federal Occupational Safety and Health Administration (OSHA) requirements
- Infection prevention and control (IPC) practices
 - Reference provided is the OSHA Safety and Health topic, *Infectious Diseases*
 - <https://www.osha.gov/healthcare/infectious-diseases/>
 - The community college educators' feedback was that this reference did not provide clear or specific guidance on the IPC topics needed to meet the OAR

Next steps

- **January 2023**

- HAI Program met with OHA's Health Policy and Analytics Division to discuss student clinical practices standards related to HAI prevention

- **March 2023**

- Met with leadership of Oregon Health Care Workforce Committee
 - Provided a short presentation about the lack of clarity related to IPC educational requirements
 - Offered IPC expertise to review and revise the rule
- Open recruitment announcement for Administrative Requirements for Clinical Training Advisory Committee (ARCTAC)
 - Members are appointed by the Oregon Health Care Workforce Committee for a term of two years; they are eligible to be reappointed to a subsequent term.
 - Members are expected to attend an annual meeting and advise OHA and the Health Care Workforce Committee regarding administrative requirements for health professional students in clinical practice settings.

ARCTAC Activities

- **July 2023**

- All members were notified of appointment to ARCTAC

- **September-October 2023**

- Entire OAR was reviewed in detail over four committee meetings
- My recommendations included
 - Updates to vaccine requirements and recommendations
 - Revisions to the infection prevention & control requirements
 - New reference: CDC Infection Control Basics (standard precautions and transmission-based precautions)

- **December 1-21, 2023**

- Public Comment period (with a public hearing 12/20/23)

Revised OAR Filed 12/28/2023

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PERMANENT ADMINISTRATIVE ORDER

OHP 5-2023
CHAPTER 409
OREGON HEALTH AUTHORITY
HEALTH POLICY AND ANALYTICS

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FILING CAPTION: REVISIONS TO ADMINISTRATIVE REQUIREMENTS FOR HEALTH PROFESSIONAL STUDENT
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RULES:

409-030-0110, 409-030-0120, 409-030-0130, 409-030-0140, 409-030-0150, 409-030-0160, 409-030-0170, 409-030-0180, 409-030-0190, 409-030-0200, 409-030-0220, 409-030-0230

AMEND: 409-030-0110

RULE TITLE: Definitions

Revised OAR 409-030

"Health profession programs must provide documentation or a signed statement that the student has received prior training, taken educational courses, or is otherwise familiar with the following:

a. The Health Insurance Portability and Accountability Act (HIPAA);

b. Bloodborne Pathogen training that is compliant with the federal Occupational Safety and Health Administration (OSHA) requirements;

c. Infection prevention practices, including all elements of the CDC's Standard Precautions, including Transmission-Based Precautions, for all patient care."

New reference link for infection prevention rule

The screenshot shows the CDC website's 'Infection Control Basics' page. The header includes the CDC logo and a search bar. The main content area is titled 'Infection Control Basics' and features a 'Print' link. Below the title, there is a paragraph stating: 'There are 2 tiers of recommended precautions to prevent the spread of infections in healthcare settings: Standard Precautions and Transmission-Based Precautions.' Two shaded boxes provide details: 'Standard Precautions for All Patient Care' (used for all patient care) and 'Transmission-Based Precautions' (used in addition to standard precautions for known or suspected infections). A 'Get Email Updates' form is located at the bottom left of the main content area. The footer contains navigation links, contact information (800-232-4636), and social media icons.

<https://www.cdc.gov/infectioncontrol/basics/index.html>

Next steps

- Follow up with community colleges and other health care education institutions
 - Awareness of revised OAR
 - Answer questions and offer training support
- Contract with strategic communication agency
 - Create specific resources for health care educators, to meet OAR
 - Consider ways to measure impact

Conclusion

- We found great value in establishing connections with health care education leaders in Oregon's community colleges
 - These individuals are responsible for curriculum content, and must ensure it meets state training requirements
 - We learned about a significant gap in IPC education standards, and how these standards can be reviewed and revised
- Improving education standards through our state's administrative rule has the potential to strengthen current and future health care students' baseline IPC knowledge
 - Standard precautions and transmission-based precautions are now clearly stated in the OAR
- Dual role of academic ID faculty + member of Oregon Project Firstline was immensely useful in this process

Thank you! Questions?

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