Zero Tolerance Policy for Infection Control Violations

Category: Dean  Date Established: to be determined
Responsible Area: Compliance/Clinical Affairs  Date Last Revised: March 1, 2016
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Summary

The UB School of Dental Medicine (“UB SDM”) has imposed a “ZERO TOLERANCE” policy for infection control violations. For the purposes of this policy, “Zero Tolerance” is defined as requiring that in every instance when an infection control violation is discovered via the audit process, the violation will be documented, addressed, and remediated as deemed appropriate by the responsible faculty member or Administrator.

Policy

POLICY STATEMENT

The ethical, moral and regulatory mandates for practice, in addition to the declaration by the New York State Education Department that “failure to comply with recommended infection control practices is professional misconduct” (http://www.op.nysed.gov/title8/part29.htm) reinforces the necessity to consistently adhere to appropriate standards of practice and to enforce compliance with these standards on an ongoing basis. In light of these standards, and in recognition of the importance of proper infection control practices in protecting the health of patients, faculty, staff and students, the UB SDM has imposed a “ZERO TOLERANCE” policy for infection control violations. For the purposes of this policy, “Zero Tolerance” is defined as requiring that in every instance when an infection control violation is discovered via the audit or inspection process, the violation will be documented, addressed, and remediated as deemed appropriate by the responsible faculty member or Administrator.

Students/Residents/Fellows:

In the case of a student’s first violation, the supervising faculty will be instructed to issue the student a Standard Not Met in the infection control section of the daily evaluation for that clinic session. That student must then take the infection control course on the SDM Intranet and pass the corresponding quiz. If the quiz is not completed within 7 days of the violation the student will be suspended from clinic until the mandate has been met.

In the case of a resident/fellow first violation, they must take the infection control course on the SDM Intranet and pass the corresponding quiz. If the quiz is not completed within 7 days of the violation the resident/fellow will be suspended from clinic until the mandate has been met. Depending on the Resident’s employment status, the appropriate program director, Compliance Officer, UB Employee Relations and/or the GME office among others, may be consulted in identifying a plan for addressing the situation.

If a student commits a second violation they will meet with the Assistant Dean for Clinical Affairs and their group director to review the violation. The faculty will determine further disciplinary
action. Disciplinary action may include any of the following: suspension of clinic privileges, reduction in the CLD grade, and/or a report to the Judicial Council.

In the case of a second violation a by PG student/resident/fellow, the Assistant Dean for Clinical Affairs will meet with the appropriate program director and/or Department Chair to determine appropriate disciplinary action.

If a third violation is committed by either a student or resident a report of the incident will be forwarded directly to the Judicial Council for predoctoral students and the Associate Dean for Advanced Education and the Assistant Dean for Clinical Affairs for residents for appropriate action. Disciplinary action up to and including dismissal from the program or other employment related actions will be considered.

**Faculty/Staff:**

Any Infection Control violation committed by a faculty/staff member will be forwarded to the Assistant Dean for Clinical Affairs, the Compliance Officer and the Department Chair for identification of next steps. Generally, documentation of the infection control violation will be sent in writing (electronically) to the faculty or staff member and immediate supervisor (for staff) or department chair (for faculty). Remediation for a first offense may include completing the online Infection Control training and passing the subsequent quiz by a specific deadline, and/or counseling or disciplinary action. Subsequent violations as well as failure to complete mandated remediation by the assigned deadline, may result in disciplinary action instituted in consultation with the Assistant Dean for Clinical Operations, SDM Compliance Officer, the Department Chair, the Dean, University at Buffalo Office of Employee Relations and appropriate collective bargaining agreements.

**APPLICABILITY**

This policy applies to all UB SDM personnel (faculty, staff, students and volunteers).

**RESPONSIBILITY:**

Dean of the School of Dental Medicine, with delegation to the School of Dental Medicine Assistant Dean for Clinical Affairs, Compliance Officer and the respective program directors or Department Chairs.

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Related Information:

Infection and Hazard Control Program Manual

Infection Control Violation Report
https://intranet.sdm.buffalo.edu/clinic/icviolation.asp