

Pre-Accreditation Element 5.4.1: Patient Care Supervision Policies and Procedures

Element Description

A COM must ensure that osteopathic students in clinical learning situations involving patient care are under direct supervision by a licensed health care professional at all times in order to ensure patient safety. The COM must ensure that all supervised activities are within the scope of practice of the supervising health care professional. Students must have clear guidelines on their role in care and the limits of their scope of authority.

1. Provide the policies addressing student supervision during the provision of patient care, including policies on the use of telemedicine, if applicable.

XUCOM Narrative

To ensure patient safety and to protect students, XUCOM requires that its students be supervised by a licensed health care professional at all times while in clinical learning situations. Medical students are learners, not licensed healthcare providers, and therefore cannot provide patient care in an unsupervised, independent manner.

XUCOM has established a policy that defines the roles of its students during the provision of patient care, including telemedicine, and the limits on their scope of authority.

XUCOM's Medical Student Supervision in Clinical Learning Situations policy is attached.

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XAVIER UNIVERSITY **College of Osteopathic Medicine** **Medical Student Supervision in Clinical Learning Situations Policy**

Effective: September 1, 2025

Last Revision: (Date)

Next Review: June 30, 2026

Responsible College Officer: Assistant/Associate Dean, Clinical Education & GME

Scope: XUCOM Medical Students involved in Patient Care

Distribution List: XUCOM Administration, Faculty, Staff, and Students; Preceptors; Webpage

A. PURPOSE

To guide the activities of medical students and their supervisors in clinical learning situations to ensure the safety of both patients and students.

B. POLICY

Element 5.4 of the Commission on Osteopathic College Accreditation (COCA) *New and Developing Accreditation Standards* (effective September 26, 2023; edited October 1, 2024) requires that a COM ensure that osteopathic students in clinical learning situations involving patient care are under direct supervision by a licensed health care professional at all times in order to ensure patient safety. The COM must ensure that all supervised activities are within the scope of practice of the supervising health care professional. Students must have clear guidelines on their role in care and the limits of their scope of authority.

C. DEFINITIONS / ABBREVIATIONS

COCA / Commission on Osteopathic College Accreditation

OMM / Osteopathic Manual Medicine

XUCOM / Xavier University College of Osteopathic Medicine

D. PROCEDURE / PROTOCOL

XUCOM students in clinical learning situations that involve patient care must be supervised by a physician (DO or MD), advance practice provider (nurse practitioner, physician assistant/associate) or other fully licensed practitioner practicing within the scope of his/her license, expertise, and credentialing body of the clinical site (as applicable).

The supervising health care provider (physician or other health care professional) is responsible for the activities of each student seeing patients on his/her rotation.

The supervisor must have an active license, be credentialed by XUCOM, and practicing within the scope of practice defined/described by their license and expertise.

The quality of student supervision is the responsibility of the XUCOM Associate Regional Dean with guidance and support from the Assistant/Associate Dean of Clinical Education and GME, and the Clinical Division Chairs.

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XUCOM students that have questions or concerns related to or regarding clinical supervision or safety issues in any clinical learning situation should contact the Assistant/Associate Dean of Clinical Education & GME.

Student Authority and Responsibility

1. Students must inform each patient of their level of training and obtain consent to participate in the delivery of their care.
 - a. If an XUCOM student has a doctorate degree in another discipline, he/she may not introduce themselves to a patient as “Dr.” while on a clinical rotation.
2. Students must abide by all HIPAA regulations.
3. Students must abide by all institutional policies related to the delivery of patient care.
4. Students may not independently write prescriptions.
5. Student may not authorize orders.
6. Students may not independently document patient encounters.
7. Students may not bill for any of their activities.
8. Supervisors may delegate responsibility after considering:
 - a. The level of the student’s training and competence.
 - b. The experience of the student with the clinical situation.
 - c. The acuity of the clinical situation.
 - d. The risk to the patient and student.
9. Students may not participate in the care of other medical students.

Student Supervision (see Appendix)

Medical students should be supervised during all aspects of patient care.

There are two (2) types of student supervision:

1. Direct Supervision
 - a. The supervisor is physically present with the student and patient.
2. Indirect Supervision
 - a. The supervisor is not physically in the presence of the student and patient, however is physically located at the site of care and immediately available to join the student and patient to provide direct supervision.

Student Activities That May be Performed under Indirect Supervision

1. Collection of Vital Signs
2. Obtaining the medical and surgical history of the patient
3. Completing a physical examination excluding any “sensitive exams”
 - a. Sensitive Examinations include:
 - i. External Genitalia
 - ii. Breast Examination
 - iii. Rectal Examination
 - iv. Pelvic Examination
4. Intramuscular and subcutaneous injections (when authorized)

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Student Activities That Must be Performed under Direct Supervision

1. Procedures (including OMM)
 - a. The supervisor must consider the student qualified thorough previous training and experience.
 - b. The names of the student and supervisor are documented in the procedural note.
 - c. The supervisor is responsible for the outcome of the procedure.
2. Sensitive Examinations (include a chaperon as appropriate)
 - a. External Genitalia
 - b. Breast Examination
 - c. Rectal Examination
 - d. Pelvic Examination
3. Telemedicine
 - a. Must complete training on the appropriate use of the equipment
 - b. Must be authorized to participate by the supervisor

E. EXHIBITS

XUCOM Course Syllabi
XUCOM Student Handbook and Clinical Rotation Manual
XUCOM Preceptor Manual

F. RELATED POLICY/POLICIES

XUCOM Academic Standards Policy
XUCOM Immunizations Policy

G. REVIEW SCHEDULE

Annually (before June 30th)

Involved Parties: XUCOM Dean; XUCOM Dean's Council;

This Policy may be reviewed and changes made at any time.

Approval/Dean's Signature _____

Date _____

Revision Date	Summary of Changes	Approval Date

Appendix

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Summary of Student Activities under Indirect and Direction Supervision

D = Direct Supervision

I = Indirect Supervision

O = Observation only

	OMS1	OMS2	OMS3	OMS4
Collect Vital Signs	D	D	I	I
Collect Historical Data	D	D	I	I
Perform Physical Exam*	D	D	I	I
Sensitive Examinations**	O	O	D	D
Procedures	O	O	D	D
OMM	O	O	D	D
Document in Patient Chart	O	O	D	D
Telemedicine	O	O	D	D

* Excludes Sensitive Examinations

** Includes external genitalia, breast examination, rectal examination, and pelvic examination