I. INTRODUCTION
St. Luke’s College – UnityPoint Health and UnityPoint Health – St. Luke’s welcome you to our Phlebotomy Certificate Program. This program will enable you to become a competent phlebotomist and a valued member of the health care team.

II. ETHICS
Patients at St. Luke’s and our clinical affiliates are entitled to have complete confidentiality and anonymity respected. Students are not to discuss names of patients or the nature of their illnesses either within the clinical facility or outside of the facility.

III. CODE OF CONDUCT
During the course of the program, students are an integral part of St. Luke’s and our clinical affiliates. Students are expected to abide by the rules that apply to all St. Luke’s employees, St. Luke’s College students, and our clinical affiliates.

IV. DRESS CODE
The purpose of the dress code is to promote professionalism and to facilitate infection control and safety. Students are expected to comply with the following dress code:

Clinical
1. Royal blue scrub top and pants. If you want to wear a shirt under the scrub top, it must be completely white or royal blue. A shirt is required underneath any V-neck style scrub top.
2. Above-ankle hosiery or socks must be worn.
3. Laboratory coats will be provided by the hospital. Laundry service is provided for lab coats.
4. St. Luke’s College student identification badges must be worn at all times during the clinical rotation. It should be worn above waist level.
5. A solid colored, leather shoe conducive to safety must be worn. The color of the socks and shoes should be appropriate for the uniform. Solid “Crocs” are considered appropriate attire, but they must not have cut-out patterns. Canvas shoes, sandals or open-toed shoes, boots, and moccasins are not acceptable.
6. Excessive jewelry (numerous rings per hand, multiple bracelets, long necklaces, tongue piercing, visible body piercing except in ears, multiple ear piercings), excessive make-up and unusual hair color are not allowed. These are not appropriate for professional attire. Acceptable jewelry includes small earrings, 1-2 rings, and conservative neck chains, including small pendants.
7. Hair should be neat and clean and if longer than shoulder length should be pulled back for safety purposes.
8. Beards or mustaches must be neatly trimmed and well groomed.
9. Artificial fingernails are prohibited. Fingernails are to be in good repair, clean, and neatly trimmed. Fingernails can promote the spread of infection and be a safety hazard.
10. Visible tattooing must be limited to one small tattoo. If the body is covered with tattoos, body should be covered so not visible.

11. A high standard of personal hygiene is to be maintained at all times. Body odor is unacceptable. Body odor, smoke odor, and perfume/cologne can be offensive to patients and staff and even cause allergic reactions.

**Classroom**
Street clothes are acceptable for classroom attire. No identification badge is to be worn with street clothes.

V. **PERSONAL ATTRIBUTES**
Phlebotomists are part of a service-orientated industry. Specific personal and professional characteristics necessary for an individual to become a successful phlebotomist are: a high sense of integrity, reliability, compassion, honesty, and flexibility. Students should display evidence of serious commitment, emotional stability, scholastic ability, and the use of sound judgment. Good personal hygiene is extremely important because of close patient contact.

VI. **EXPENSES**
1. **Tuition:** Tuition for the phlebotomy certificate program is $1000. Tuition is due in full prior to the class start date.

2. **Tuition Refund:** The student is entitled to a 100 percent tuition refund, excluding the $100 nonrefundable enrollment fee, if withdrawal from the program occurs prior to the first day of class. The student must submit a written statement of withdrawal to the Program Director. No refunds will be made once classes begin except under extraordinary circumstances as determined by the Program Director and the Dept. Chair of Student Services.

3. **Books:** Allow approximately $65 for a required textbook. Books can be purchased through St. Luke’s College Bookstore, and payment is expected at the time of purchase. Review books for certifying exams are available for purchase.

4. **Certifying Examinations:** Application fees for the ASCP Board of Certification (BOC) national certifying exam is subject to change. The cost is currently $135. A subscription to online ASCP-BOC practice exams is available for $25.

5. **Criminal Background Check:** A passed criminal background check is required prior to clinical participation, dependent on requirements of the clinical site. The student is responsible for all costs associated with the criminal background check. The current cost is $56, but is subject to change.

6. **Transportation:** Classes are held at St. Luke’s College. Clinical rotations are held at St. Luke’s, Mercy Medical Center, UnityPoint Clinic – Family Medicine at Sergeant Bluff, Orange City Area Health System, and other sites, as needed. Transportation is the responsibility of the student.

7. **Other Expenses:** Students must make their own arrangements for room and board. Discounts are available to students using the St. Luke’s cafeteria.
VII. SERVICE WORK
Students do not take the responsibility or substitute for qualified staff phlebotomists. However, after demonstrating proficiency, students, with qualified supervision, may be permitted to perform procedures during regular clinical hours. It is recognized that some students may have to subsidize the expense of this course of study with outside employment. Any such employment is voluntary, supervised, paid, and subject to employee regulations.

Program officials neither encourage nor condone employment outside of academic hours. If a student's progress in the program is affected, the student would be counseled on this matter.

VIII. STUDENT HEALTH
1. Health Exam: A medical examination and record of required immunizations must be received by Student Services prior to the first day of class. Failure to provide documentation of all necessary immunizations will result in inability to enroll and/or continue enrollment. Each student must be able to show proof of a current physical examination, including two-stage TB skin testing or chest X-ray, Hepatitis B and tetanus vaccinations, age appropriate immunity or immunizations for measles, mumps, rubella, and chicken pox. Sound physical, mental, and emotional health are necessary for phlebotomists. Handicaps are evaluated on an individual basis by program officials. St. Luke’s Phlebotomy Certificate Program adheres to Fair Practices in Education. The Program does not discriminate with respect to age, sex, marital status, race, color, creed, national origin, or handicap, except those handicaps which may affect professional performance or academic standards. Note-takers or special assistance is not provided in the classroom.

2. Hepatitis Vaccine: It is strongly recommended that students receive the hepatitis vaccine series prior to starting the clinical practicum. Students who choose not to receive the vaccine are required to sign a waiver that will be maintained in their Student Health file.

3. TB Screening: Students are required to furnish written documentation of a negative TB (Mantoux) skin test within the past 12 months and a second negative skin test completed within the three months immediately preceding the start of the first class, or two negative TB skin tests at least two weeks apart completed within the three months immediately preceding the start of the first class, or if the student has a history of positive TB skin tests and chest x-ray results within the last three months, provide documentation of medical treatment for TB.

4. Injuries: Any injury incurred in the hospital must be reported to program officials and/or clinical instructors. Emergency services are available through the ER/OP Department of the hospital. Needle stick injuries are to be reported immediately and blood exposure documentation completed. The Employee Health nurse is contacted and HIV, Hepatitis B and C testing is initiated on the source patient and on the student. The decision to initiate medication will be decided by the Employee Health nurse and/or the ER physician. The student and/or the student’s personal health insurance are responsible for all medical care costs associated with blood and body fluid exposure.
5. **Counseling:** The Program Director will be available to assist students in understanding and observing program policies and practices and for advising on professional and career issues. Students may be referred by the Program Director/Student Services Director to the Employee Assistance Program (EAP) for personal problems that may interfere with progress in the program. The EAP provides professional resources for assessment, counseling, and appropriate referrals to professional assistance. All advising and counseling is impartial and confidential.

6. **Health Records:** Confidentiality of student health records will be maintained by St. Luke’s College Student Services with access to the student. All student health records are scanned and put into CAMS software system for a permanent record that students can access from the student portal.

**IX. SAFETY**

St. Luke's College and St. Luke’s laboratory is committed to providing a safe work environment and believes that employees and students have a right to know about health hazards associated with their work. So that they can make knowledgeable decisions about any personal risks they encounter, a Laboratory Safety Program is established to designate policies, procedures, and responsibilities designed to develop awareness of potential hazards in the laboratory and to train employees and students in appropriate, safe work practices.

The Laboratory Safety Program contains written policies and procedures adequate for the laboratory's scope of activities. At minimum, such areas as Fire Safety, Electrical Safety, Chemical Hygiene, Biohazard and Exposure Control, and Disaster Preparedness will be included.

Students are required to complete mandatory hospital and laboratory orientation activities prior to starting their clinical experiences. All students performing clinical rotations complete modules through St. Luke’s NetLearning. These modules include many safety procedures. In addition, there is a safety module which includes information about Material Safety Data Sheets (MSDS). There is a Safety and Infection Control module contained in the phlebotomy program curriculum, as well. In addition, students assigned to clinical rotations other than St. Luke’s or UnityPoint Health physician clinics will attend orientation sessions at their specific clinical site.

There are many engineering devices throughout the laboratory to help make laboratory work safer, including state of the art instrumentation, safety shields, goggles, barrier-proof lab coats, gloves, and phlebotomy equipment. Students are shown the location of fire extinguishers, fire blankets, safety showers, exits, eye wash stations, and hazardous spill kits. They are instructed on the correct use of the safety equipment.

An evaluation of all incident, variance, and accident reports is carried out within the processes of the Quality Improvement Program to eliminate hazards, to educate, and to increase safety in the workplace.
X. HOSPITALIZATION INSURANCE AND LIABILITY

It is **strongly recommended** that students have health insurance coverage during the course of the program. Students are covered for liability of clinical practice under the hospital's insurance plan.

XI. ATTENDANCE

The classroom/skills lab portion of the program consists of 46 clock hours and is held at St. Luke’s College. Daily attendance is expected. Class sessions will be held in an evening/Saturday format within a five-week time period. The student must attend all class sessions in their entirety to be successful in this program. The student is responsible for reading class assignments, and completing study questions and clinical situations (case studies) prior to class. The student must notify the program director or classroom instructor prior to the start of class if he/she cannot be in class. Students are expected to be on time for each class session. Students must be present for 80% (37 hours) of the class to pass the program regardless of grade point average.

The clinical experience is designed to provide the student with entry-level competencies in routine blood collecting techniques. The practicum will consist of 112 clock hours and requires the completion of 100 successful, unaided venipunctures and 15 dermal punctures, as well as a study project. Clinical rotations are scheduled Monday through Friday, 0700-1530, 1400-2230, or 0830-1700. St. Luke’s, UnityPoint Clinic – Sergeant Bluff, Orange City Area Health System, and Mercy Medical Center-Sioux City will serve as clinical sites with additional sites added as needed. All students’ clinical experiences will be comparable.

Attendance is **mandatory** to complete the 112 **required** clinical hours. In the case of unavoidable excused absences, the hours missed must be made up at the convenience of the clinical laboratory within the specified time frame. The program director and the clinical site must be notified 2 hours before the scheduled time for reporting at the clinical site in the case of unavoidable absences. **Students with more than one unexcused absence for the clinical practicum will be dismissed from the program.**

XII. DIDACTIC (CLASSROOM) AND CLINICAL ACADEMIC STATUS

The Program Director keeps records of each student’s performance in both didactic and clinical areas of study. These records are to assess the student’s progress. The following policies cover academic status up to and including dismissal from the Program.

**Criteria for Passing:**

1. Grading system:

<table>
<thead>
<tr>
<th>Grade</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>90-100%</td>
</tr>
<tr>
<td>B</td>
<td>80-89%</td>
</tr>
<tr>
<td>C</td>
<td>70-79%</td>
</tr>
</tbody>
</table>

   Below 70% is considered failing.
a. The grade for this course will be based on both the classroom performance and clinical practicum performance. Each component will be worth 50% of the course grade.

The classroom grade will consist of the scores from 6 quizzes, lab exercises, and a final exam and practical exam.

Classroom Grade = 50% of total grade

<table>
<thead>
<tr>
<th>Component</th>
<th>Weight</th>
</tr>
</thead>
<tbody>
<tr>
<td>6 Quizzes</td>
<td>30%</td>
</tr>
<tr>
<td>Lab Exercises/Evaluation</td>
<td>15%</td>
</tr>
<tr>
<td>Final Exam</td>
<td>30%</td>
</tr>
<tr>
<td>Final Practical</td>
<td>25%</td>
</tr>
</tbody>
</table>

The clinical practicum grade will consist of the scores from the clinical supervisor/instructor’s evaluation and assigned projects.

Clinical Practicum Grade = 50% of total grade

<table>
<thead>
<tr>
<th>Component</th>
<th>Weight</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clinical Instructor’s Evaluation</td>
<td>70%</td>
</tr>
<tr>
<td>Project</td>
<td>30%</td>
</tr>
</tbody>
</table>

b. The student must achieve 70% or better in the classroom component in order to participate in the clinical practicum. Failure to achieve a 70% or better will result in dismissal from the program.

c. The student must achieve 70% or better in both the classroom and clinical components to successfully complete the program.

d. Program officials will approve the student as having satisfactorily completed all requirements of the program and eligible to take certifying examinations for Phlebotomy Technicians. The student will be awarded a certificate from the program upon completion. Issuing of the Program Certificate is NOT contingent upon a student passing external certification or licensure examinations.

Students have the right to file a grievance or appeal a dismissal decision. Refer to Appeal/Grievance Procedure.

XIII. STUDENT ACADEMIC AND NONACADEMIC APPEAL/GRIEVANCE PROCESS
Recognizing that differences of opinion occur throughout working relationships, the student academic and nonacademic appeal/grievance procedure is the mechanism through which differences are resolved. An appeal/grievance is defined as any complaint or feeling of unfair treatment among students or between students and faculty. The purposes of this procedure are to contribute toward developing mutual respect, to foster equitable communication, and to achieve reconciliation between the parties involved. It is to provide a systematic means of settlement.
**Process**

Step 1: The student discusses the situation with the individual(s) involved and the Program Director (Department Chair). This discussion/conference must be scheduled within ten (10) business days of the occurrence. It is encouraged that communication be open and direct; attempting to achieve a mutually agreeable resolution to the situation.

Step 2: If satisfactory resolution is not achieved with Step 1, the student must submit the complaint in writing no later than ten (10) business days to the Department Chair of Student and Administrative Services who informs the Executive Dean/Chief Academic Officer of the nature of the appeal. (If the grievance involves the Department Chair of Student and Administrative Services, the written grievance/appeal goes directly to the Executive Dean/Chief Academic Officer). The Executive Dean/Chief Academic Officer appoints a chairperson for a grievance committee, the committee members, and makes all parties aware of the grievance within five (5) business days of the receipt of the grievance. The committee is comprised of faculty and staff who are not involved in the appeal and who do not have a direct report relationship with anyone else on the committee. The total number of committee members, including the chairperson, will be an odd number. All grievance documents must be shared with the committee members and the involved parties.

The Chairperson schedules a conference with the involved parties and the committee within five business days of the naming of the Chairperson and committee. The purpose of the conference is to discuss the grievance/appeal, obtain information from the parties involved, and to attempt to achieve a mutually satisfactory resolution. Each party involved may elect to be accompanied by a representative from the College and/or Medical Center to assist in presentation of information. The Dept. Chair of Student and Administrative Services can serve as student advocate and will be present during the committee proceedings if requested by the student, but will have no voting privileges. The Chair of the Committee will have no voting authority except in cases of an impasse. The Committee will have up to five (5) business days to render its decision and communicate to the parties involved and the Dept. Chair of Student and Administrative Services. Decisions will be communicated to all involved parties in written form on College Letterhead and delivered to the student as a certified letter. The chairperson may send a copy of the letter via email.

Step 3: If satisfactory resolution is not achieved by either party in Step 2, the dissatisfied party must make a written appeal to the Executive Dean/Chief Academic Officer within five (5) business days of the delivered written committee decision. After review of all information and discussion with involved individuals, the Executive Dean/Chief Academic Officer shall render a written decision within five (5) business days of the receipt of the appeal.

Step 4: If satisfactory resolution in not achieved by either party in Step 3, the dissatisfied party must make a written appeal to the Chancellor of the College within five (5) business days of the delivered written Executive Dean/Chief Academic Officer decision. After review of all information and discussion with the involved individuals, the Chancellor shall render a written decision within ten (10) business days of the receipt of the appeal, which shall be final.
**Student Complaint Log**

St. Luke’s College is required to maintain a log of formal complaints by students. A complaint is considered formal if it is made in writing and submitted to one of the following members of the administrative team: Chancellor, Department Chair of Educational Program, or the Department Chair of Student and Administrative Services.

Administration will maintain a file (either in an electronic or paper format) with the following information regarding the student complaint:

- Date the complaint was first formally submitted in writing to Administration
- A summary of the nature of the complaint
- Steps taken by the College to resolve the complaint
- The final decision made including referral to outside agencies
- Other external actions initiated by the student to resolve the complaint, if known.

Information about complaints will be shared with accreditors, but individual identities will be withheld. Letters or documents from individual complainants shall not be shown to creditors without the express permission of the complainant.

**XIV. DISCIPLINARY ACTION**

Reasons for disciplinary actions up to and including dismissal are as follows:

1. Scholastic failure
2. Technical incompetence
3. Theft, immoral conduct, fighting, willful destruction of property on hospital grounds
4. Being under the influence of alcohol, drugs, or chemicals
5. Inconsiderate treatment of patients or discussion of confidential information with unauthorized persons
6. Cheating on school examinations or dishonesty in the performance or Reporting of test procedures
7. Excessive unexcused absenteeism and/or tardiness
8. Any other act classified as criminal

**XV. GRADUATE COMPETENCIES**

Description of Career Entry Competencies of the Phlebotomist:
St. Luke’s College Phlebotomy Certificate Program provides students with an educational environment in which the following competencies will be attained upon completion:

1. Recognize components of the health care delivery system, and understand the integral role specimen collection has in this system.
2. Demonstrate proficient knowledge and techniques in the ordering, collecting, transporting, handling, and processing of blood and various body fluid specimens.
3. Demonstrate basic understanding of the anatomy and physiology of body systems and knowledge of medical terminology.
4. Associate the major areas of the clinical laboratory with the laboratory tests ordered to evaluate patients’ pathologic conditions.
5. Identify and select collection equipment, supplies, and various types of additives used.
6. Recognize factors that can interfere in specimen collection procedures and clinical analysis and appropriate actions needed to resolve problems.
7. Demonstrate knowledge of infection control and safety procedures.
8. Demonstrate understanding of quality control in phlebotomy.
9. Recognize the importance of the responsibilities of other laboratory and health care personnel.
10. Demonstrate stress management, communication skills with patients, co-workers, other health care personnel, and the public, and the legal implications of the work environment.
11. Demonstrate a desire for continuing education and professional development.
12. Apply basic principles in learning new techniques and procedures.
13. Apply ethical principles to all aspects of work performance.

XVI. STUDENT FILES
Students or graduates are welcome to review their own personal file upon request to Program Officials. No information will be released from student files to any third party, employer, or other; unless a written consent form authorizing release of information is signed by the student or graduate.
ST. LUKE’S COLLEGE
PHLEBOTOMY CLINICAL PRACTICUM

I. Course Description
The clinical experience is designed to provide the student with entry-level competencies in routine blood collecting techniques. The practicum will consist of 112 clock hours.

II. Entry Requirements
Students must have successfully completed the didactic portion of the St. Luke’s College phlebotomy course and be able to communicate in written and spoken English. Students are responsible for their own transportation to clinical assignments.

III. Course Objectives
At the conclusion of the clinical practicum, students will

1. Demonstrate proficiency in collecting blood specimens from a variety of patients using standard operating procedures.
2. Demonstrate the ability to receive and process blood and non-blood specimens for laboratory testing.
3. Adopt the required characteristics of an employee in a patient care environment.

IV. Course Requirements
1. Complete 112 hours of clinical experience. Perform a minimum of 100 successful, unaided venipunctures and 15 dermal punctures.
2. Clinical rotations are scheduled Monday through Friday, 7:00 a.m. to 3:30 p.m., but other time frames may be scheduled depending on availability at clinical sites. All clinical times missed must be made up at the convenience of the clinical laboratory site. The student’s clinical experience will be scheduled for one of two three-week sessions. Placement in a session will depend on student preference and availability at time of acceptance.
3. Complete a study project by the end of the last week of the clinical assignment.
4. Adhere to program policies for acceptable performance while in a clinical assignment.

V. Grades
Clinical Evaluation 70%
Project 30%

VI. Attendance
Attendance at all scheduled clinical assignments is mandatory. Five percent of the grade will be deducted for each unexcused late arrival after the first unexcused late arrival. In the case of an emergency, the clinical facility and the program director must be notified. Unavoidable absences must be made up at the convenience of the laboratory within the specified time frame. **Students with more than one unexcused absence from the clinical practicum will be dismissed from the program.**
ST. LUKE’S COLLEGE
PHLEBOTOMY CLINICAL PRACTICUM
OBJECTIVES

Upon completion of the clinical assignment, the student will

1. Demonstrate correct patient identification procedures.
2. Interpret routine laboratory test orders by selecting the correct type and number of collection tubes and equipment needed for blood collection by venipuncture, dermal, and arterial puncture.
3. Given a request for a non-routine lab test, choose the correct specimen collection procedure before collecting the specimen.
4. Label all specimens according to laboratory policy.
5. Effectively communicate with patients with confidence and compassion.
6. Perform a minimum of 100 successful venipunctures using vacutainers and syringes while following standard operating procedure and demonstrating correct technique.
7. Make no more than two attempts to obtain a specimen.
8. Perform a minimum of 15 successful dermal punctures while demonstrating correct technique and following standard operating procedures; obtain the necessary amount of specimen.
9. Comply with all hospital and laboratory safety regulations and practices.
10. Demonstrate safety collection techniques according to laboratory policy.
11. Follow HIPPA standards to maintain patient confidentiality.
12. Comply with all hospital and laboratory infection control and isolation policies and procedures, and perform proper infection control techniques.
13. Follow OSHA Standard Precautions when in contact with blood and other body fluids; identify and label biohazardous materials.
14. Use practices as described in the OSHA Hazard Communication Standard.
15. Provide patients with proper instructions and containers for the collection and preservation of various specimens, such as blood, sputum, and throat cultures.
16. Follow necessary criteria for the collection and handling of specimens and test results that will be used as legal evidence.
17. Perform Quality Control procedures when required and report results to the instructor, recognizing unacceptable results.
18. Follow laboratory policy in reporting failure to obtain specimens after two attempts.
19. Expedite the collection of STAT and timed specimens.
20. Recognize unacceptable specimens and collection conditions and take appropriate action.
21. Work cooperatively with laboratory staff.
22. Demonstrate the initiative and self-confidence to perform laboratory procedures approved by the laboratory supervisor.
23. Organize work to achieve maximum efficiency.
24. Recognize specimens that need to be collected and volunteer to collect them.
25. Display professional integrity by recognizing discrepancies in test requests and specimens, taking corrective measures, and/or reporting them to the supervisor.
26. Exhibit professional behaviors and appearance.
27. Incorporate techniques in the performance of phlebotomy procedures based on the physical age and developmental stage of the patient.
28. Accept constructive criticism, continuously strive to improve performance, and use free time constructively.
29. Receive and collect blood and other specimens in the laboratory computer system; perform other computer functions necessary to accomplish job functions.

**CLINICAL PRACTICUM POLICIES**

1. It is **strongly recommended** that students have individual health insurance. St. Luke’s provides medical malpractice insurance.
2. Evidence of good health including checks for TB, MMR, tetanus, chicken pox, and Hepatitis B series (or signed waiver) must be on file with St. Luke’s College Student Health.
3. Students must have passed a criminal background check to be eligible to participate in the clinical component of the program.
4. Attendance at all scheduled clinical assignments is mandatory. Students must arrive at the scheduled time, be properly dressed, and be ready to work. Five percent of the grade will be deducted for each unexcused late arrival after the first unexcused late arrival. In the case of an emergency, the clinical facility and the program director must be notified. Unavoidable absences must be made up at the convenience of the laboratory within the specified time frame. **Students with more than one unexcused absence from the clinical practicum will be expelled.**
5. Students are required to adhere to the dress code stated in the program policies. Students must exhibit good personal hygiene and professional appearance.
6. Clinical personnel are volunteering their time to instruct students. Clinical staff providing instruction and supervision must be treated with respect at all times.
7. If a conflict arises between the student and clinical staff, the program director and clinical coordinator should be notified as soon as possible. The student should feel free to discuss any problems with the clinical assignment during weekly visits of the program director.
8. Students must follow standard safety precautions and safety policies of the clinical facility.
9. In the event of an accident involving a student, the clinical supervisor must be notified immediately and the program director must be notified by the end of the clinical day.
10. If a student requires emergency care during the clinical assignment, the clinical facility will provide that care. Charges associated with that care will be the responsibility of the student or the student’s health care insurance.
11. Students may be dismissed from a clinical assignment for any of the following reasons:
   i. Acting in a manner that endangers the safety of patients or staff
   ii. Failure to properly identify patients
   iii. Incorrectly labeling or identifying specimens
   iv. Furnishing false information to the College or clinical facility
   v. Illegal, inappropriate and/or excessive use of alcoholic beverages or any illegal drug
   vi. Failure to adhere to clinical facility policies
   vii. Unethical use of supplies, equipment, or patient information