



## STUDENT CONSUMER INFORMATION

*Institutional or Financial Aid Information may be obtained by contacting:*

**Admissions Department**

(978) 862-9600 press “1” for Admissions  
admissions@saba.edu

**Financial Aid Department**

(978) 862-9600 press “3” for Financial Aid  
finaid@saba.edu

### A. PRIVACY OF STUDENT RECORDS – FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA)

In accordance with the Family Education Rights and Privacy Act of 1974, Saba University School of Medicine students have the right to review, inspect, and challenge the accuracy of information kept in the cumulative file by the institution. Records that may be released to the student for review include: grade and evaluation reports and transcripts that relate to student progress. Student progress notes that are held by individual faculty are not considered part of the student’s official file and cannot be released.

### B. COST OF ATTENDANCE

SUSOM Cost of Attendance 2018-2019											
Semester	Basic Science					Clinical Medicine					TOTAL
	1	2	3	4	5	6	7	8	9	10	
<b>Tuition</b>	\$16,975	\$16,975	\$16,975	\$16,975	\$16,975	\$19,600	\$19,600	\$19,600	\$19,600	\$19,600	\$182,875
<b>Fees</b>	841	370	491	370	870					500	3,442
<b>Books &amp; Supplies</b>	950	690	1486	526	400	1,000	1,000	1,000	1,000	1,000	9,052
<b>Room &amp; Board</b>	6,100	6,350	6,350	6,350	6,350	7,400	7,400	7,400	7,400	7,400	68,500
<b>Utilities</b>	900	900	900	900	900	800	800	800	800	800	8,500
<b>Phone/net</b>	880	880	880	880	880	880	880	880	880	880	8,800
<b>Malpractice Insurance</b>	-	-	-	-	-	295	295	295	295	295	1,475
<b>USMLE Exams</b>	-	-	-	-	840	-	-	2,165	-	-	3,005
<b>Transportation</b>	800	-	800	-	800	800	800	800	800	800	6,400
<b>Miscellaneous Expenses</b>	800	800	800	800	800	800	800	800	800	800	8,000
<b>Loan Fees*</b>	1,208	1,153	1,226	1,146	1,232	1,350	1,350	1,443	1,350	1,372	12,830
<b>Total</b>	<b>\$29,454</b>	<b>\$28,118</b>	<b>\$29,908</b>	<b>\$27,947</b>	<b>\$30,047</b>	<b>\$32,925</b>	<b>\$32,925</b>	<b>\$35,183</b>	<b>\$32,925</b>	<b>\$33,447</b>	<b>\$312,879</b>

\*Estimated loan fees based on Grad Plus origination fees. Actual amount may vary.

### C. REFUND / WITHDRAWAL POLICIES

Tuition Refund Policy: Tuition and fees shall be refunded in full, less an administrative fee of \$100, and the \$750 acceptance deposit, if notice of withdrawal is received prior to the first day of class. Tuition and fees shall also be refunded in full for the current enrollment period, less an administrative fee of \$100 and the acceptance deposit, under the following circumstances:

- Courses cancelled by the institution
- Involuntary call to active military duty
- Documented death of the student
- Exceptional circumstances, with approval of the President or designee of the institution

Application fees are nonrefundable. Refunds will be calculated by the Finance Office and will be refunded within (30) days of withdrawal.

The tuition will be refunded as follows:

- A refund of 100% of the tuition for which the student is obligated shall be issued if the student withdraws prior to the first day of class.
- A refund of 90% of the tuition for which the student is obligated shall be issued if the student's last date of attendance is prior to the expiration of 10% of the period of enrollment for which the student was charged or obligated.
- A refund of 50% of the tuition for which the student is obligated shall be issued if the student's last date of attendance is prior to the expiration of 25% of the period of enrollment for which the student was charged or obligated but more than 10%.
- A refund of 25% of the tuition for which the student is obligated shall be issued if the student's last date of attendance is prior to the expiration of 50% of the period of enrollment for which the student was charged or obligated but more than 25%.
- In case of withdrawal after 50% of the period of enrollment, the student is obligated for full tuition and fees.

All monies paid by an applicant will be refunded if cancellation occurs within three business days after signing the terms of enrollment and making initial payment. In

order to be eligible for a tuition refund, students must obtain a financial clearance letter from the Administrative Office at Saba University and a formal withdrawal form must be completed and authorized by the Dean.

### D. UNITED STATES DEPARTMENT OF EDUCATION RETURN TO TITLE IV (R2T4) REGULATIONS

The law specifies how Saba University School of Medicine ("SUSOM") must determine the amount of Title IV program assistance that students earn if they withdraw from school. See section on Withdrawals for specific information regarding Leaves of Absence (LOA) and the withdrawal process. The Office of Financial Aid is responsible for calculating R2T4 and the Business Office is responsible to actually transfer the funds. The Office of Financial Aid uses worksheets and software provided by the US Department of Education to calculate the R2T4 funds. All funds must be returned to the lender within 45 days of the last date of attendance. If you have questions about your Title IV program funds, students can call the Federal Student Aid Information Center at 1-800-4-FEDAID (1-800-433-3243). TTY users may call 1-800-730-8913. Information is also available on Student Aid on the Web at <https://studentaid.ed.gov/sa/>.

When a student withdraws during a payment period, the amount of Title IV program assistance that has been earned up to that point is determined by a specific formula. The date of withdrawal is earlier of the date the student notified the Registrar or Program Director of their intent to withdraw or the date the student submitted the withdrawal form. If the student received (or the school received on the student's behalf) less assistance than the amount that earned, the student may be able to receive those additional funds. If the student received more assistance than was earned, the excess funds must be returned by the school and/or the student.

The SUSOM attendance policy is described in the university catalog and the student handbooks. All Basic Science courses have a minimum 80% attendance requirement (for some courses the minimum requirement may be higher), and full attendance is required at clinical clerkships. Students who do not meet the attendance requirements are reported to the university's Registrar who notifies the student's Program Director of the lack of attendance.

The Program Director will consult with the student's faculty to verify the last date of attendance. Without an official Withdrawal Form, the university will use the last date of attendance to compute the R2T4 formula.

In the case where a student notifies the Program Director or a faculty member that he or she intends to withdraw, the student must be informed of the need to complete the Official Withdrawal Form, document the date the student notified them and share that information with the university Registrar. Should the student fail to file the Withdrawal Form or there is a lag between the notification and the filing of the form, the earlier date of notification will be used in calculating the R2T4 formula. In the event a student receives all failing grades for a semester, the Program Director will contact the faculty members to determine if the failing grades were earned or represent a lack of attendance. In the event it is determined that those grades were the result of lack of attendance, the Program Director and faculty will attempt to determine the last day of attendance and use that date in the R2T4 calculations. If the exact date cannot be determined, the university will assume a 50% attendance, and use that date as the last date of attendance. Students who do not attend even one class, are ineligible for Title IV funds and all of the loan proceeds will be returned to the lender.

The amount of assistance earned is determined on a pro rata basis. The payment period is the semester for which the loan was certified and the percent of attendance is calculated by dividing the number of days attended by the total number of days in the payment period. For example, if the student completes 30% of the payment period or period of enrollment, the student has earned 30% of the assistance they were originally scheduled to receive. Once the student has completed more than 60% of the payment period or period of enrollment, all the assistance that the student was scheduled to receive for that period is considered to have been earned. If the student did not receive all of the funds that were earned, he or she may be due a post-withdrawal disbursement. If the post-withdrawal disbursement includes loan funds, the student may choose to decline the loan funds so that additional debt is not incurred. The Office of Financial Aid will use the R2T4 worksheets as provided by the US Department of Education to determine how much of the loan may be retained and how much must be returned.

SUSOM may automatically use all or a portion of your post-withdrawal disbursement (including loan funds, if the student accepts them) for tuition, fees, and room and board

charges (as contracted with the school). For all other school charges, the school needs the student's permission to use the post-withdrawal disbursement. If the student does not give permission (which some schools ask for at the time of enrollment) the student will not be offered the funds. However, it may be in one's best interest to allow the school to keep the funds to reduce the debt at the school.

There are some Title IV funds that students were scheduled to receive that cannot be earned once a student withdraws because of other eligibility requirements. For example, if a first-time, first-year undergraduate student has not completed the first 30 days of the program before withdrawal, the student will not earn any FFEL loan funds that he or she would have received had the student remained enrolled past the 30th day. If the student receives (or the school receives on behalf of the student) excess Title IV program funds that must be returned, the school must return a portion of the excess equal to the lesser of:

1. The institutional charges multiplied by the unearned percentage of the funds, or
2. The entire amount of excess funds.

The school must return this amount even if it didn't keep this amount of the Title IV program funds. If the school is not required to return all of the excess funds, the student must return the remaining amount. Any loan funds that must be returned, the student repay in accordance with the terms of the promissory note. That is, scheduled payments are made to the holder of the loan over a period of time. Students who have received a refund of their loan proceeds before withdrawing may be required to return part or all of those funds to the lender.

Title IV funds will be returned in the following order:

1. Unsubsidized Federal Stafford loans
2. Subsidized Federal Stafford loans\*
3. Federal PLUS loans

The requirements for Title IV program funds when students withdraw are separate from any refund policy that the school may have. Therefore, the student may still owe funds to the school to cover unpaid institutional charges. The school may also charge for any Title IV program funds that the school was required to return. Student may receive a copy of the refund Policy from the Business Office.

If you have questions about your Title IV program funds, you can call the Federal Student Aid Information Center at

1-800-4-FEDAID (1-800-433-3243). TTY users may call 1-800-730-8913. Information is also available on Student Aid on the Web at <https://studentaid.ed.gov/sa/>.

## E. LEAVES OF ABSENCE (LOA) AND WITHDRAWALS

Definitions:

### Approved Leaves of Absence (LOA)

An LOA is a temporary interruption in a student's program of study. LOA refers to the specific time period during a program when a student is not in attendance and will return to complete the program. Students returning from a LOA are not required to re-apply for admission but must re-register for their courses.

### Unapproved Leaves of Absence

A school may grant a student an LOA that does not meet the conditions to be an approved LOA for Title IV purposes (for example, for academic reasons). However, any LOA that does not meet all of the conditions for an approved LOA is considered a withdrawal for Title IV purposes

### Official Withdrawal

A "withdrawal" refers to a student's intent to completely terminate studies at an institution with no expectation of return. Students who subsequently decide to return to their studies must re-apply for admission through the university's Office of Admissions.

### Unofficial Withdrawal

An unofficial withdrawal is one where the school has not received notice from the student that the student has ceased or will cease attending the school

Note: Students who withdraw from courses or the program receive a grade of "W" on their transcript. The grade is considered the same as an "F" grade in calculating the quantitative aspect of the Satisfactory Academic Progress standards and may affect the student's future eligibility for Financial Aid.

### LOA and Withdrawal Request Forms

The form required by SUSOM to request a LOA or a Withdrawal is available on the campus website and from the Registrar.

### Approved LOA's

An LOA must meet certain conditions to be counted as a *temporary* interruption in a student's education instead of being counted as a withdrawal requiring a school to perform a Return calculation. If an LOA does not meet

the conditions in the student is considered to have ceased attendance and to have withdrawn from the school, and the school is required to perform a Return calculation.

In order for an LOA to qualify as an *approved LOA*:

1. All requests for LOA's be submitted in writing to the Program Director and include the reason for the student's request. The form must be signed and dated by the student and specify the date the student wants the LOA to begin and end.
2. Students must apply in advance for an LOA unless unforeseen circumstances prevent the student from doing so.
3. The situation described for the reason for the LOA must be generally non-academic in nature and must be one that leads to a reasonable expectation that the student will return from the LOA within the allowed time frame.
4. The LOA together with any additional leaves of absence must not exceed a total of 180 days in any 12-month period including days in which school is not in session.

All requests for LOA's will be reviewed by the Program Director, the university Registrar and the Director of Financial Aid. The student will be notified in writing by the Program Director of the university's decision.

During the LOA, the institution will not assess the student any additional institutional charges, the student's financial need will not increase, and therefore, the student will not be eligible for any additional disbursements of Federal Student Aid.

If the student is a Stafford Loan recipient, the school will explain to the student, prior to granting the LOA, the effects that the student's failure to return from an LOA may have on the student's loan repayment terms, including the expiration of the student's grace period.

A student granted an LOA that meets the criteria stated above is not considered to have withdrawn, and no Return calculation is required. Upon the student's return from the leave, he or she continues to earn the Federal Student Aid previously awarded for the period.

### Completion of coursework upon return

In as much as approved leaves of absence are viewed as temporary interruptions in a student's attendance, **and since the academic programs at SUSOM are considered term-based programs, where the payment period is the term, a student returning from an LOA must do so at a**

**time when he or she can complete the term in order to complete the payment period and be eligible to receive a second or subsequent disbursement.** Therefore, for students enrolled in credit-hour term programs, in order for an LOA to be an LOA, the school must allow a student returning from an LOA to complete the coursework that he or she began prior to the LOA.

#### **Students who return earlier than anticipated**

The school may permit a student to return to class before the expiration of the student's LOA in order to review material previously covered. However, until the student has resumed the academic program at the point where he or she began the LOA, the student is considered to still be on the approved LOA. **The days the student spends in class before the course reaches the point at which the student began his or her LOA must be counted in the 180 days maximum for an approved leave of absence.** A student repeating coursework while on LOA must reach the point at which he or she interrupted training within the 180 days of the start of the student's LOA.

#### **Student who fail to return from LOA's**

If a student does not return to the school at the expiration of an approved LOA (or a student takes an unapproved LOA), the student's withdrawal date is the date the student began the LOA.

#### **Explanation of consequences of withdrawal to loan recipients**

A student who is granted an approved LOA is considered to remain in an in-school status for Title IV loan repayment purposes. If a student on an approved LOA fails to return, the school must report to the loan holder the student's change in enrollment status as of the withdrawal date. One possible consequence of not returning from an LOA is that a student's grace period for a Title IV program loan might be exhausted. Therefore, in order for a LOA to be an approved LOA, prior to granting a leave of absence, a school must inform a student who is a Title IV loan recipient of the possible consequences a withdrawal may have on the student's loan repayment terms, including the exhaustion of the student's grace period.

#### **Unapproved LOA's**

A school may grant a student an LOA that does not meet the conditions to be an approved LOA for Title IV purposes (for example, for academic reasons). However, any LOA that does not meet all of the conditions for an approved LOA is considered a withdrawal for Title IV purposes. The student's withdrawal date is the date the student begins the LOA. An unapproved LOA may be treated as an official

withdrawal since the school would have previously granted an LOA. Therefore, the school would know immediately that the student had ceased attendance for Title IV purposes, and must use the specified withdrawal date in the Return calculation.

## **F. SATISFACTORY ACADEMIC PROGRESS REGULATIONS**

The U.S. Department of Education requires institutions of higher education to establish minimum standards of satisfactory academic progress for students receiving Federal aid. Satisfactory Academic Progress (SAP) means the student is proceeding in a positive manner toward fulfilling degree requirements. SAP includes two standards; qualitative and quantitative. Students must meet both standards to continue receiving financial aid.

#### **Qualitative**

In order to maintain eligibility for financial aid with the qualitative standard, a student must maintain the academic standing necessary to remain at Saba University School of Medicine ("SUSOM"). The Financial Aid Office will conduct a review at the end of each semester (i.e., payment period) to determine the students successful progress toward obtaining a degree by comparing cumulative grade average to hours earned. A student must maintain satisfactory academic performance as outlined below to remain enrolled in the program or to continue receiving aid. A student must also maintain an overall grade point average of at least 2.0 (as determined taking into account grades for Repeated Courses in a manner as defined in the Repeating Courses section below) to continue in the program beyond the basic science portion of the program. Additionally, in order to meet the university's requirement for graduation, a student must meet all graduation requirements specified in the catalog.

Students may be dismissed by the university at the end of any semester if they have not made sufficient academic progress to warrant continuance of study. Students who fail to maintain sufficient academic progress will be dismissed from the program. Termination of students will follow policies and procedures adopted by the university.

#### **Quantitative**

To assess students' academic progress, the medical school program is divided into increments of Academic Years. An Academic Year is comprised of two semesters. Therefore, the SUSOM curriculum encompasses one and one half Academic Years in a calendar year. The SUSOM curriculum is comprised of five Academic Years (ten semesters) – 2.5

Academic Years (five semesters) of basic science and 2.5 Academic Years (five semesters) of clinical medicine. The maximum time frame for completing the entire program of study (including both the basic science and clinical medicine portions of the program) is 7 Academic Years, or 14 semesters.

1. Basic science students may take up to 3.5 Academic Years (7 semesters of enrollment) to complete the basic science portion of the medical school curriculum. During the basic science portion of the program, the following outlines the university's satisfactory academic progress requirements:

- By the end of the 1st semester of enrollment, a student must have successfully completed a minimum of 10% of the total number of credit hours required to complete the basic science portion of the curriculum.
- By the end of the 2nd semester of enrollment, a student must have successfully completed a minimum of 16% of the total number of credit hours required to complete the basic science portion of the curriculum.
- By the end of the 3rd semester of enrollment, a student must have successfully completed a minimum of 39% of the total number of credit hours required to complete the basic science portion of the curriculum.
- By the end of the 4th semester of enrollment, a student must have successfully completed a minimum of 60% of the total number of credit hours required to complete the basic science portion of the curriculum.
- By the end of the 5th semester of enrollment, a student must have successfully completed a minimum of 75% of the total number of credit hours required to complete the basic science portion of the curriculum.
- By the end of the 6th semester of enrollment, a student must have successfully completed a minimum of 90% of the total number of credit hours required to complete the basic science portion of the curriculum.
- By the end of the 7th semester of enrollment, a student must have successfully completed 100% of the total number of credit hours required to complete the basic science portion of the curriculum.

2. Clinical Students may take up to 3.5 Academic Years (7 semesters) to complete the clinical medicine portion of the medical school curriculum. During the clinical medicine portion of the program, the following outlines the university's satisfactory academic progress requirements:

Satisfactory academic progress is checked at the end of each term of clinical enrollment (i.e., payment period).

To meet the university's requirements for satisfactory progress, students must have completed a minimum of:

- 12 weeks of clinical medicine rotations by the end of the first semester of clinical enrollment;
- 24 weeks of clinical medicine rotations by the end of the second semester of clinical enrollment;
- 36 weeks of clinical medicine rotations by the end of the third semester of clinical enrollment;
- 49 weeks of clinical medicine rotations by the end of the fourth semester of clinical enrollment;
- 61 weeks of clinical medicine rotations by the end of the fifth semester of clinical enrollment;
- 73 weeks of clinical medicine rotations by the end of the sixth semester of clinical enrollment;
- 80 weeks of clinical medicine rotations by the end of the seventh semester of clinical enrollment.

If the student does not meet the satisfactory academic progress requirements at the end of a semester, the student will be placed on financial aid warning for the next semester. The student is still considered to be making satisfactory academic progress while on warning and is eligible for Title IV aid.

If at the end of the warning period, the student does not achieve satisfactory academic progress requirements, the student may be placed on financial aid probation and remain eligible for Title IV aid if – a) the student appeals the determination; and b) the school determines that the student should be able to meet the satisfactory academic progress standards by the end of the subsequent payment period or the school develops an academic plan for the student that, if followed, will ensure that the student is able to meet the satisfactory academic progress standards by a specific point in time. Students placed on financial aid probation will not be eligible to receive Title IV aid for the subsequent payment period unless the student makes satisfactory academic progress or the school determines that the student met the requirements specified in the academic plan specified by the school for the student.

If at the end of the warning period, the student does not achieve satisfactory academic progress requirements, and the student is not placed on financial aid probation, all Title IV aid will be terminated. The student may also be terminated from the school. If the student is not terminated they may continue in school as a self pay student.

SUSOM evaluates Satisfactory Academic Progress at the end of each semester (i.e., payment period). Withdrawals and incompletes are not included in the overall grade average. Students must complete all required courses by the end of the degree. Students who achieve a passing grade may not repeat a course. Students who fail a required course must repeat the course and obtain a passing grade before completion of their degree. There are no noncredit remedial courses. Scheduled awards for the next academic year for students who are not making Satisfactory Academic Progress will be canceled.

Financial aid will be disbursed each semester. Students who withdraw after that will have their eligibility to retain part of their financial aid calculated on the percentage of the semester attended. Students who attend more than 60% of the term may retain all of their aid. See the section on Return to Title IV (R2T4) below.

#### **Transfer Students**

Transfer students' transcripts will be evaluated by the Program Director. Those courses which are applicable to the degree requirement will be accepted and will be used to measure the quantitative SAP requirement. Only those grades earned at SUSOM will be used to compute the qualitative requirement.

#### **Change of Program or Degree**

Not applicable.

#### **Concurrent Degrees**

Not applicable.

#### **Additional Degrees**

Not applicable.

#### **Notification**

Students will be notified of any Satisfactory Academic Progress evaluation that impacts the student's eligibility for Title IV, HEA program funds.

#### **Appeal Process**

A student may appeal a determination of unsatisfactory progress by submitting a written appeal to the school Director explaining why they did not meet satisfactory academic progress and what has changed that will allow them to meet satisfactory academic progress if their appeal is approved to continue in school. The decision of the Director shall be final. Special consideration will be made only for mitigating circumstances, i.e., illness, injury, death in the family. If the appeal is approved a student will be allowed to reenter or continue in school under a probation

period and will be considered to be in satisfactory academic progress and eligible for Title IV funding.

#### **Incompletes**

Students receiving an (I) incomplete grade have one marking period to submit the required work to their instructor and receive a final grade. Failure to do so will result in a grade change to a (F).

#### **Repeating Courses**

A failed grade may be repeated and replace the current grade. All credits attempted are considered when calculating maximum time frame. A student's enrollment status may include repeating any coursework previously taken in the program but may not include more than one repetition of a previously passed course or any repetition of a previously passed course due to the student's failing other coursework.

#### **Remedial and Non Remedial**

Remedial and Non-Credit remedial courses do not apply and have no effect on satisfactory progress.

#### **Elective Courses**

Elective Basic Science courses do not apply and have no effect on satisfactory progress.

#### **Withdrawals**

A "W" is issued for a dropped class and does not affect the CGPA but the credits are counted as credits attempted and will affect the maximum timeframe.

#### **To Re-Establish Satisfactory Progress for Federal Funds**

If a student wants to return to school but has been terminated for unsatisfactory progress and is still within maximum time frame, the student would have to reestablish eligibility for Title IV funding by completing one semester meeting the satisfactory academic progress requirements.

### **G.. TRANSFER OF CREDIT POLICIES**

<https://www.saba.edu/admissions/admission-requirements>

### **H. ACCREDITATION, APPROVAL AND LICENSURE OF INSTITUTION AND PROGRAM**

<https://www.saba.edu/about-us/key-accreditations>

### **I. HONOR CODE**

Students are required to sign an honor code contract prior to matriculation, stating that he/she will maintain a high

degree of personal honor and integrity during their medical training. The Student Honor Code is printed in the Student Handbook.

## J. STUDENT ACTIVITIES

<https://www.saba.edu/student-life/life-on-campus>

## K. RESIDENCY PLACEMENT SERVICES

The Clinical Medicine program staff at Saba University School of Medicine takes special pride in mentoring students for residency positions in the United States and other countries.

Students become eligible for the National Resident Matching Program in the United States by passing Step 1, Step 2CK and Step 2CS of the USMLE. Each student is given individual attention and guidance throughout their application process. Personal statements are reviewed and a comprehensive Medical Student Performance Evaluation (MSPE), formerly known as the Dean's Letter, is written for residency training directors. A partial list of Saba University graduates' residency appointments is located in the university catalog.

## L. MILITARY LEAVE

If a student receives an involuntary call to active military duty, tuition and fees shall be refunded in full for the current enrollment period, less an administrative fee of \$100 and the acceptance deposit.

## M. STUDENT FINANCIAL ASSISTANCE

i. Assistance Available from Federal State, Local and Institutional Programs

<https://www.saba.edu/admissions/financial-aid/financial-aid-us>

ii. Federal Student Financial Aid Penalties for Drug Law Violations

The Higher Education Act of 1965 as amended (HEA) suspends aid eligibility for students who have been convicted under federal or state law of the sale or possession of drugs, if the offense occurred during a period of enrollment for which the student was receiving federal student aid (grants, loans, and/or work-study). If you have a conviction(s) for these offenses, call the Federal Student Aid Information Center at 1-800-4-FED-AID (1-800-433-3243) or go to the FAFSA web site (<https://fafsa.ed.gov/>), click on "Before Beginning A FAFSA" in the left column, then click

on "Student Aid Eligibility Worksheet" to find out how this law applies to you.

If you have lost federal student aid eligibility due to a drug conviction, you can regain eligibility if you pass two unannounced drug tests conducted by a drug rehabilitation program that complies with criteria established by the U.S. Department of Education.

iii. Financial Aid Code of Conduct

The Higher Education Opportunity Act (HEOA) requires educational institutions to develop and comply with a code of conduct that prohibits conflicts of interest for financial aid personnel [HEOA §487 (a)(25)]. Any Saba University School of Medicine ("SUSOM") officer, employee, or agent who has responsibilities with respect to student educational loans must comply with this code of conduct.

- Neither SUSOM as an institution nor any individual officer, employee or agent shall enter into any revenue-sharing arrangements with any lender. A revenue-sharing arrangement means an arrangement between SUSOM and a lender under which the lender provides or issues loans to students attending SUSOM or to the families of such students; and SUSOM recommends the lender or the loan products of the lender and in exchange, the lender pays a fee or provides other material benefits, including revenue or profit sharing, to SUSOM or its agent.
- No officer or employee of SUSOM who has responsibilities with respect to education loans, or agent who has responsibilities with respect to education loans, or any of their family members, shall solicit or accept anything of value (of more than a de minimis amount) in exchange for any advantage sought by the lender in making educational loans available to enrolled or prospective students of SUSOM.
- An SUSOM officer or employee who is employed in the financial aid office or who otherwise has responsibilities with respect to education loans, or an agent who has responsibilities with respect to education loans, shall not accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.
- SUSOM shall not: a. for any first-time borrower, assign, through award packaging or other methods, the borrower's



loan to a particular lender; or b. refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.

- SUSOM shall not request or accept from any lender any offer or funds or be used for private education loans, including funds for an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with: a. a specified number of private educational loans (non-Title IV loans) or loans made, insured, or guaranteed under Title IV; b. a specified loan volume of such loans; or c. a preferred lender arrangement for such loans.
- SUSOM shall not request or accept from any lender any assistance with call center staffing or financial aid office staffing.
- Any employee who is employed in the financial aid office, or who otherwise has responsibilities with respect to education loans or other student financial aid, and who serves on an advisory board, commission, or group established by a lender, guarantor, or group of lenders or guarantors, shall be prohibited from receiving anything of value from the lender, guarantor, or group of lenders or guarantors, except that the employee may be reimbursed for reasonable expenses incurred in serving on such advisory board, commission, or group.

## N. HEALTH AND SAFETY

### i. Drug and Alcohol Abuse Policy

The use, possession or distribution of illegal drugs carries serious penalties. Abuse of alcohol resulting in impaired performance or legal difficulties will be dealt with stringently. Saba University School of Medicine recognizes health care professionals are at risk for substance abuse and will attempt to assist any student with substance abuse problems in a rehabilitative manner. The services of a psychiatrist and psychologist are available for such cases.

### ii. Vaccination Policy

Diseases you are exposed to in the Hospital or Office (dangerous places if you're not careful)

(A) Needle sticks and Blood and Body Fluid Exposures

- 1) Hepatitis B
- 2) Hepatitis C
- 3) HIV

(B) Aerosol and Droplet Exposures

- 1) TB

- 2) Measles
- 3) Chickenpox
- 4) Meningococcus
- 5) Pertussis
- 6) Influenza
- 7) Rubella

(C) Fecal Transmission

- 1) Salmonella
- 2) Shigella
- 3) Cryptosporidiosis
- 4) Enterovirus
- 5) Adenovirus
- 6) Hepatitis A

(D) Direct Inoculation

- 1) Herpes Simplex
- 2) S. Aureus
- 3) Group A Streptococcus
- 4) EKC (Pink Eye)
- 5) Syphilis
- 6) Scabies

Diseases You Can Transmit to Patients or Other Healthcare Personnel-Don't be a Vector

(A) Respiratory Route

- 1) TB
- 2) Influenza
- 3) Measles
- 4) Chickenpox
- 5) Rubella

(B) Direct Contact

- 1) Herpes Simplex
- 2) EKC
- 3) Enteric Infections
- 4) Gram-Negative Bacilli
- 5) S. Aureus
- 6) Drug Resistant Bacteria
- 7) Hepatitis B
- 8) Grp A Strep, Clostridia

Precautions

#### 1. Wash Your Hands for at least 15 seconds, more is better!

a. Hands washed without using a scrub agent will not significantly reduce the numbers of resident organisms (e.g. S. epi, Corynebacteria, P. acnes,) but is effective in removing transient flora such as gram-negative bacilli and S. Aureus.

b. Always wash hands between different patients as well as between "clean and dirty" sites on the same patient.

c. Always wash hands, and then glove (put on gloves) before inserting or manipulating an intravascular device or any other device, which will enter a sterile body site. Wear a mask too.

## 2. Observe Isolation Procedures

a. Isolation procedures are based on a large body of scientific work. They come from the CDC, and are based on recommendations from people who are smarter than most of us. They are rational.

b. Each isolation category specifies whether gloves, gowns, masks, or goggles are necessary when in close contact with the patient or even entering the room.

c. Isolation is intended for appropriate patients whether they are alive or dead. Specimens derived from patients. All specimens taken from isolated patients must be designated as isolation specimens and placed in the appropriate protective bags. The lab must be aware that a specimen is from an isolation patient as body fluids can be hazardous when spilled, splattered or aerosolized in the lab.

d. There is a copy of the infection control manual and the isolation category cards at every nursing station refer to them or contact the Hospital's Epidemiology Department when you have questions.

## 3. If you are sick, do not be a vector.

a. Consult a physician. If you go home, tell the hospital immediately and e-mail to SUSOM. Follow the SUSOM procedures.

b. Wear a mask if you've have a respiratory illness, go home if you think you have influenza

c. Wash your hands a lot.

d. If you have a contagious disease or have been exposed to one, the Hospital needs to know. Report it to your supervisor for the particular rotation and tell SUSOM.

## 4. Be Careful with Needles.

a. Do not attempt to recap them.

b. Dispose of them (used or un-used) only in the red plastic containers.

c. Know where the container is located BEFORE using needles.

d. Do not use needle cutters, and do not try to bend or break them yourself.

e. Be careful when you are cleaning up after any bedside

procedure, e.g. lumbar punctures/spinal taps, thoracentesis, bone marrow aspiration. Do not leave needles under drapes if the nurses are going to clean up for you.

f. During blood culturing, there is no need to change needles between the patient and the blood culture bottles.

g. Occasionally while in the hospital or clinic, a student is accidentally stuck with a needle potentially contaminated by infectious material. Should this occur you should thoroughly clean the wound immediately and stimulate bleeding. As soon as possible you should inform your supervisor for the particular rotation. *An incident report should be filed at the nursing station and a note made in the patient's chart. Every hospital has a Needle-Stick Policy, ask the nurse in charge for it, and follow it immediately and completely.* If you make a decision to not follow the Hospital/clinical site procedures completely, you must sign a waiver at the clinical site, AND tell SUSOM immediately (within 48 hours) so it can be recorded. Failure to notify SUSOM immediately is grounds for dismissal from the school.

## 5. Generic Blood and Body Fluid Precautions

a. Follow Universal Precautions for Body Fluid Exposure at all times.

b. Use disposable, non-sterile gloves whenever you handle blood, urine, sputum, or any other bodily fluid from any patient, or you change dressings or manipulate an IV or a catheter.

## 6. Hepatitis B Vaccine

a. Safe and Efficacious

b. Both Engerix and Recombivax are derived from yeast via gene cloning and are absolutely free of infection risk.

c. HBIG (serum derived) is required if exposed without prior vaccine.

d. Vaccine is required at this point too.

e. Single needle stick exposure to HBeAG+ person will result in 40% chance of clinical Hepatitis B or seroconversion.

f. Sequelae of Chronic Carrier state.

Chronic Hepatitis

Cirrhosis

Delta Virus Superinfection

Hepatoma

Vasculitis

Limiting your ability to practice your specialty of choice

**7. HIV/AIDS**

- a. Incidence and prevalence in the population continues to be of serious concern.
- b. HIV transmission has been documented due to occupational exposure, but is unusual. The risk from a needle stick is about 1:300.
- c. In prospective studies of 1000 unbroken mucous membrane or skin exposures, there has been no documented transmission.
- d. No HIV transmission occurs with casual contact, nor with fairly intimate but not sexual or parenteral exposure. Recommended isolation procedures are no doubt adequate, but be careful.
- e. If you're pregnant, or think you are, no special precautions are needed outside of standard isolation procedures. In general, this would be a situation where generic blood and body fluid precautions should be followed.

**8. Vaccination/Prevention**

- a. In addition to Hepatitis B vaccine, you should receive the appropriate yearly influenza vaccine.
- b. Measles, Mumps, Chicken Pox, and Rubella serologies are required and a booster is indicated with repeat serology if you are not immune.
- c. Your TB infection record must be assessed and recorded every year.
- d. If your TST/PPD (TB Skin Test) is negative, we now mandate a Two Step TST/PPD. If your TB skin test is positive, irrespective whether you received BCG or not, we consider it a 'positive' and require a physical exam confirming your good health, and a recent Chest X Ray (CXR).

**RESPIRATORY MASK USE AND FITTING**

Occasionally, especially when an influenza epidemic is threatening, a hospital asks that a student be certified in mask fitting which means that the student knows what size mask he/she needs and has learned how to don the mask. However, since international medical schools use multiple hospitals for the clinical training of their students, and these hospitals do not all use the same type of mask it is impossible for SUSOM to certify its students. Please read the following for your own education. If you are asked about certification, ask your hospital to assist you in acquiring the certification, and please let SUSOM Clinical Office know.

**O. VOTER REGISTRATION**

Information on voter registration in the United States can be found through the United States Election Assistance Commission ([http://www.eac.gov/voter\\_resources/contact\\_your\\_state.aspx](http://www.eac.gov/voter_resources/contact_your_state.aspx)).