



Program Standards and Guidelines

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PHILOSOPHY OF PHARMACY TECHNOLOGY PROGRAM

The Pharmacy Technology Program is dedicated to preparing men and women for a career as certified technical assistants of licensed pharmacists in providing health care and medication to patients in institutional (hospital) and retail settings.

PHILOSOPHY

In keeping with the mission statement of South Texas College, we, the faculty of the Pharmacy Technology program believe that:

Human Beings

Human beings are integrated beings with biological, psychological, and social components. Although human beings are individuals with unique characteristics, each has basic human needs that are affected by their internal and external environment. Included in this environment are their cultural backgrounds as well as their status on the wellness-illness continuum. Each individual has the right to self-determination, and inherent to that right is the responsibility for choices made.

Health

Health in its various stages, is a state to which all individuals are deserving. Health is influenced by intrinsic and extrinsic forces to which adjustments must constantly be made in order to maintain some degree of balance.

Pharmacy Technology Education

Pharmacy Technology education is a one-year program of learning activities through which the student develops the theoretical knowledge base, communication techniques, and pharmacy skills necessary to perform tasks to assist the licensed pharmacist in a safe, ethical and legal manner. The framework of this education involves the knowledge of drug classes, theories of disease processes and pharmacotherapy, pharmacy law, mathematics and application of principles and practices from the pharmaceutical sciences. Since the roles of pharmacy technicians

continue to expand beyond traditional skill related tasks, pharmacy technology education must prepare the learner to adapt to change.

Learning is a life-long process of change in which the individual acquires knowledge, skills and attitude by means of study, practice and experience. The teaching-learning process is a collaborative problem-solving relationship between the student and instructor that prepares the student to cope with change and assume responsibility for his/her own learning. Each student is a unique individual and has his/her own patterns of learning, which are affected by his/her innate capabilities, motivation, perceptions and previous experiences including his/her educational background. Learning is enhanced when learning activities are meaningful, rewarding and presented in a variety of settings. The teaching-learning process is augmented when the instructor presents the content in a logical sequence leading from dependence to independence. The instructor furnishes curricular structure, provides direction and acts as a role model and facilitator.

CURRICULUM OBJECTIVES

This course of study will provide the student with the opportunity to acquire knowledge and skills necessary to:

1. Demonstrate a comprehensive knowledge of pharmacy accounting principles and inventory control.
2. Serve customers of diverse cultural backgrounds with care and compassion in various situations.
3. Utilize technology optimally in multiple pharmacy settings to maximize work efficiency and improve patient care.
4. Manage information and communications in a confidential and organized manner.
5. Demonstrate mastery of drug selection of a preparation using appropriate techniques for various administration routes.
6. Demonstrate ability to follow all government regulations and pharmacy policies and procedures while performing pharmacy activities.
7. Applies critical thinking and problem solving skills to various pharmacy situations.
8. Applies ethical standards to daily situations and promotes a professional pharmacy image.

TEXAS STATE BOARD OF PHARMACY

PHARMACY TECHNICIAN TRAINEE REGISTRATION

Beginning February 1, 2007, all pharmacy technicians and pharmacy technician trainees are required to be registered with the Board of Pharmacy prior to being employed as or performing the corresponding duties in any pharmacy setting.

- An individual may only register once as a pharmacy technician trainee.
- Pharmacy technician trainee registration expires two years from the date of registration and may NOT be renewed.
- Applicants for pharmacy technician trainee registration shall:
 - Have a high school or equivalent diploma or be working towards a high school or equivalent diploma for no longer than two years;
 - Complete the Texas application for registration
 - Submitting all documentation necessary for the Board to review the criminal history record, including fingerprint information and paying required fees.

PHARMACY TECHNICIAN REGISTRATION

- Registered pharmacy technician trainees must complete all of the requirements for pharmacy technician registration, including acquiring certification by the Pharmacy Technician Certification Board, within the two year trainee registration period.
- Upon successful completion of this program individuals may apply to take the Pharmacy Technician Certification Examination (PTCE) to qualify as a Certified Pharmacy Technician (CPhT). Passing this examination is required to become a registered pharmacy technician in Texas.

REGISTRATION ELIGIBILITY

According to Chapter 568 of the Texas Pharmacy Act, the Texas State Board of Pharmacy may determine not to issue a pharmacy technician trainee or pharmacy technician registration or renew a pharmacy technician registration and may suspend or revoke any pharmacy technician or trainee registration if the applicant or registrant has any of the following:

1. violated any rules pertaining to Pharmacy Technician Registration
2. engaged in gross immorality, as that term is defined by the rules of the board
3. engaged in any fraud, deceit, or misrepresentation, as those terms are defined by the rules of the board, in seeking a registration to act as a pharmacy technician
4. been convicted of a misdemeanor involving moral turpitude (ie. spousal abuse, child abuse, extortion, contributing to delinquency of a minor, sexual assault, etc.)
5. been convicted of a felony
6. a drug or alcohol dependency
7. violated:
 - Chapter 481 or 483, Health and Safety Code, or rules relating to those chapters
 - Sections 485.031-485.035, Health and Safety Code; or
 - A rule adopted under Section 485.011, Health and Safety Code

8. Violated the pharmacy or drug laws or rules of this state, another state, or the United States
9. Had a registration as a pharmacy technician issued by another state revoked, surrendered or suspended for conduct substantially equivalent to conduct described by Subdivisions 1-6.”

For further information, please contact the Texas State Board of Pharmacy. Any issues which may affect potential registration must be resolved directly with the Texas State Board of Pharmacy. The Pharmacy Technology program is NOT involved in the registration process for pharmacy technician trainee nor for pharmacy technician.

PHARMACY TECHNICIAN CERTIFICATION BOARD (PTCB)

The PTCB administers the Pharmacy Technician Certification Examination, and successful completion of this exam is required for registration as a pharmacy technician in Texas. Conviction of a felony involving a violation of state or federal drug laws causes an individual to be ineligible to take this exam. Any questions involving a drug related felony or other criminal background issues should be addressed with the PTCB by the student. The South Texas College Pharmacy Technology program is NOT involved in this process.

PROGRAM STANDARDS

This Pharmacy Technology Program Handbook contains summary information only and is not a publication of the official rules, regulations, or policies related to the subject matter. All official rules, regulations, and policies of South Texas College are published in the Rules and Regulations of the Board of Trustees of the South Texas College.

All documents submitted become property of the College on receipt. It is to be understood that any misrepresentation of the facts will make the applicant ineligible for admission. Likewise, if it is later determined that there was a misrepresentation of the facts, the student will be dismissed from the program.

Students are expected to meet all standards issued by the Texas State Board of Pharmacy, South Texas College, the Nursing and Allied Health Division, and the Pharmacy Technology Program.

PHARMACY TECHNOLOGY PROGRAM ATTENDANCE STANDARD:

The student is expected to attend all classes, field trips, school programs, and clinical rotations as assigned and to accept responsibility for his/her own transportation and expense including liability insurance.

ATTENDANCE GUIDELINES:

Absence

- *Any arrival (to class, lab or practicum) 30 minutes past the scheduled class or practicum time will be counted as an absence for that course.*
- *The student is responsible for all material and assignments missed while absent. Though the student is absent, the student still must turn in assignments on time or make arrangements with the course instructor to turn in assignments at a later date with possible point deduction as determined by the course instructor.*
- *Missed labs must be made up within two weeks of the absence. The student is responsible for contacting the course instructor to make arrangements for the make-up lab. If the lab is not made up within two weeks of the absence, then a grade of zero will be given for that lab period.*
- *Students must call/email all of the appropriate course instructor(s) prior to the beginning of class(s) on each absent day.*
- *A student who cannot report for practicum must call the appropriate site and the practicum instructor before practicum arrival time on each absent day. **Failure to call may result in dismissal from practicum.***
- *In case of an absence without a prior notification to the course instructor, **NO MAKE UP EXAMINATIONS WILL BE GIVEN.** If the absence is due to a bona fide medical emergency with a doctor's excuse or if a prior call to the course instructor is made, then a make-up examination may or may not be given at the discretion of the course instructor.*
- *A doctor's clearance is required for all illnesses or health conditions that put the student or faculty, classmates, and patients at risk.*

Classroom Attendance

The student is expected to attend the entire class period. If the student needs to leave early due to an appointment or emergency, then the student must notify the instructor before class or as soon as the student is aware of the emergency.

RE-ADMISSION

Please refer to the Nursing and Allied Health Division Student Handbook. Due to Texas State Board of Pharmacy regulations, the Pharmacy Technology Program has the following additional standard:

- Students who apply for re-admission to the Pharmacy Technology program must do so with the next application period after their withdrawal/dismissal from the program.
- Students who wait to reapply until a later application period will not be eligible for admittance to the program because Texas Board of Pharmacy regulations mandate pharmacy technician trainee registration expires two years after initial registration and is NOT renewable.

DISMISSAL

In addition to the Nursing and Allied Health Standards, students may be dismissed from the Pharmacy Technology program according to the following criteria:

1. Failure to comply with contract for program continuance or to comply with unsafe practice remediation act.
2. Failure to call the practicum instructor and the appropriate site before practicum arrival time on each absent day.
3. Failure to call the appropriate course instructor(s) prior to the beginning of class(s) on each absent day.
4. Failure to meet program attendance standards.
5. Failure to notify program chair of a change in criminal record or drug/alcohol dependency at any time during the Pharmacy Technology program course of study.
6. The Texas State Board of Pharmacy revokes or suspends pharmacy technician trainee registration at any time during the Pharmacy Technology program course of study.

GRADING and EVALUATION

Grading Scale

Theory/Lab: Based on numeric computations as determined by the current computer grade calculation program as follows:

A	=	90% - 100%
B	=	80% - 89%
C	=	75% - 79%
D	=	70% - 74%
F	=	69% or less
<i>PHRA 1309:</i> A	=	100%
F	=	< 100%
<i>Practicum:</i>		Pass (P) or Fail (F)

Grades below the minimum competency requirement of 75% WILL NOT BE ROUNDED (ie. a grade of 74.9999 is a “D”. Refer to the course instructor’s syllabus whether the instructor will round grades ABOVE 75%. This applies to all grades issued for all course requirements during the semester as well as the final course grade.

Examinations/Quizzes

Students must start examinations/quizzes on the announced date and time. Students who arrive to class AFTER the instructor has begun to pass out the examination/quiz will NOT be allowed to take the exam/quiz. Make ups WILL NOT BE GIVEN for examinations/quizzes missed due to tardiness. This includes both regular semester and final examinations.

Students must ask the course instructor for permission to leave and return during an examination/quiz. Whether or not permission to leave is granted is at the discretion of the course instructor. Students who leave during an examination/quiz without permission from the course instructor will not be allowed to continue the examination/quiz upon their return.

Final Examinations

The final examination in a course is an evaluation of total course content competency. Students are expected to master the course content during the semester and demonstrate competency in course material theory and application. The faculty believes that students who apply themselves to master the course material consistently through the semester have the knowledge base and skills necessary to demonstrate satisfactory competency on the final examination. For this reason, the following standards apply to final examinations in the Pharmacy Technology program:

- A student must be passing a course with a grade of 75 or better in order to take the final exam in each course.
- If a student is ineligible to sit for the final exam in the course, then the course average at the end of the semester will be reported as the course grade.

The following applies to PHRA 1206, 1309, 1313, 1345, 1349 and 1404:

- All course requirements (quizzes, exams, homework, class activities/projects) will only determine course grade PRIOR TO the final exam. These requirements will not have any impact on the course grade once the final examination has been taken.
- Once the final examination has been taken, the final examination grade **IS** the final course grade.

Some courses do not have final examinations (PHRA 1301, PHRA 1340, PHRA 1541), and therefore the course grade is determined by meeting the course criteria as outlined in the course syllabus.

GUIDELINES FOR PROFESSIONAL APPEARANCE

Our patients and practicum sites have the right to expect a professional appearance from all pharmacy technician students. The Professional Appearance Standard must be met for practicum as well as class, lab and final examinations.

PROGRAM DRESS (FEMALES AND MALES)

- Navy scrubs
- Tennis/athletic shoes with closed heel and toe, clean and in good condition (no ripped stitching, nylon; no loose rubber soles); color is optional.
- In cool/cold weather a long sleeve tee or turtleneck shirt may be worn UNDER scrub top. (Must be a solid color, no patterns, pictures, letters or logos).
- White socks
- STC Clinical Name Badge on left side of scrub top. (Not on sleeve or bottom hem of scrub top).
- South Texas College Pharmacy Technology patch on left sleeve of scrub top.
- Lab/practicum accessories such as watch with second hand, calculator, practicum paperwork, etc. are mandatory.
- Personal articles of clothing may NOT be worn over uniform (ie. sweatshirts, jackets, etc.), and no visible accessories other than those indicated under “Jewelry” are allowed while participating in any program activity.
- No personal head coverings (ie. baseball caps, hats, scarves, etc.) will be allowed while participating in program activities. This includes class, lab, practicum, and any on-campus or off-campus field trips, conferences, etc.
- The above standards do NOT apply to the disposable gowns, jumpers, bouffant caps, gloves and shoe covers you will be required to wear during sterile lab activities.

HAIR

- Hair must be clean, well groomed, above the collar and away from the face to be in compliance with Infection Control standards.
- Hair barrettes should be of color compatible to the hair color. Ribbons, scarves, colored barrettes and alligator clips are not acceptable. All hair will be retrained in pony tails (men/women), and bangs will be worn above the eye brows.
- Male students must keep beards and mustaches clean and neatly trimmed, or be clean-shaven.

TATTOOS

- If tattoos are visible while wearing the scrub uniform, they must be covered while participating in program activities at practicum sites.

FINGERNAILS

- Nails may be freshly polished, if desired, and are not to exceed the tips of the fingers in length.
- Artificial fingernails and nail jewelry are not allowed in the sterile/non-sterile pharmacy lab or practicum settings.

HYGIENE

- Good oral hygiene and clean bodies, free of odor are essential.
- Cosmetics, colognes and perfumes should be applied *discretely*.

JEWELRY

The student will be required to physically enter a sterile environment meeting USP Chapter 797 Clean Room standards which are enforceable by state pharmacy law. Though the student may be required to gown up prior to entry, jewelry may rip through sterile gowns, latex gloves or may fall off in the sterile environment causing contamination of the site. For this reason:

- No body jewelry (including but not limited to stud earrings, watches, wedding bands, eyebrow/nose piercings) will be allowed in the sterile clean room lab.

For the security of your personal jewelry items, if you are scheduled to enter the sterile clean room lab on a particular class or practicum day, please leave your jewelry items at home. STC will not be responsible for any lost or stolen personal items.

PREGNANT PHARMACY TECHNOLOGY STUDENTS:

- Pregnant students who are attending practicum may be inadvertently exposed to materials which may be hazardous for the mother and the unborn child (i.e. chemotherapy, hormones and other materials), and this fosters the need for disclosure of pregnancy by the student to the practicum instructor and to the practicum preceptor. The student is responsible for disclosing this information to the program chair, practicum instructor and the preceptor. Neither the instructor nor the preceptor may relay this information to the other person.
- Pregnant students must be able to meet all program objectives including attendance. Reasonable accommodations in assignment will be made as long as they are consistent with course objectives.
- A physician's clearance stating that the student can participate fully both in the practicum and classroom setting is required both at the onset of the pregnancy and again upon returning to class after delivery.
- Any absence related to the pregnancy will require a physician's clearance to return to class.

MEDICATION SIMULATIONS

This applies to programs in which medication simulations are performed. The products used for medication simulation are for instructional purposes only. Many of these products are placebos labeled “Not for Human Consumption” or “For Instructional Purposes Only” and include oral, topical, injectable, inhaled, and ear/eye products. IV bags are only for practicing IV admixture and administration techniques on mannequins. Under no circumstances should students administer any of the above on another human/animal or themselves.

It is important for the students to learn the correctly spelled names for medications, so when candy substitutes are used to simulation medication, it will be designated by a small brightly colored sticker containing the name of the candy placed on the package. In special lab projects which include the consumption of oral medications by the students as part of the assignment, the standard candy substitutions will be as follows:

- Regular tablets = candy coated chocolates (colors to vary)
- Mini sized tablets = mini sized candy coated chocolate (colors to vary)
- Liquid medications = lemonade (flavor ranging from sour to sweet by absence or addition of sugar)

It is the responsibility of the student to disclose to the instructor the inability to consume the candy or lemonade substitutions due to allergy, health, religious or other reasons.

The candy and lemonade stored and used in program labs are to be treated with the same respect as medications. They are not to be consumed by students indiscriminately like food and beverage. If a student does consume any of these products in any amount outside of a lab assignment simulating medication consumption, the instructor will report the incident on a Conference Report form and formally reprimand the student.

COMMUNICATION DEVICES

The faculty is aware of the outside responsibilities of the student which may require constant communication access. Students may have cell phones on VIBRATE during class and lab time. Students are expected to behave professionally and answer the phone outside lab and class when they believe the call may be to inform them of an emergency (accident, sick child, etc.). Students should NOT leave the class every few minutes to answer every phone call received. Please save texting for breaks and after class/lab.

During quizzes and examinations, all communication devices and personal belongings must be left along the front wall of the class room. If a student needs to go to the restroom during an examination, with instructor permission, no communication devices may be taken with them.

SOUTH TEXAS COLLEGE PHARMACY TECHNOLOGY PROGRAM

PRACTICUM PERFORMANCE EVALUATION

Evaluation is an ongoing process. The student will receive an evaluation at the end of each semester to reflect the level of clinical competency. Evaluations serve as a tool to measure student progress.

GUIDELINES

- Students will NOT be allowed to remain enrolled in PHRA 1268 CAPSTONE: Practicum if the following are not met PRIOR to the first day of class:
 - Pharmacy technician trainee registration verified on-line by program chair
 - Complete clearance to attend practicum by the Clinical Affairs Specialist
- Only one individual may act as Practicum Preceptor for a given student rotation. That individual, RPh. or PhTR, is the only person who may verify practicum hours and perform midterm and final evaluations.
- Preceptors will evaluate each student under their supervision twice during the practicum rotation, at midterm and at the end of the rotation. Each rotation has specific requirements and objectives that must be met in order to receive a passing evaluation. Students will be evaluated on a PASS/FAIL basis. All required practicum course hours must be completed and students must obtain a satisfactory "S" or not applicable "N/A" on each objective of the final practicum evaluation to receive a PASS grade. Students must receive a **PASS** to progress in the program.
- Students are encouraged to make an appointment with the instructor at any time he/she feels it is necessary to communicate areas of need to instructor.
- A practicum conference will be held with the practicum instructor at the conclusion of each rotation to review accomplishment of objectives.

SAFE PRACTICUM PRACTICE STANDARD

PURPOSE OF PROFESSIONAL PRACTICUM EXPERIENCES

The purpose of Pharmacy Technology professional practicum experiences is to provide an opportunity for the Pharmacy Technology student to demonstrate competence in the cognitive (knowledge & judgment), psychomotor, and affective skills necessary to practice in the profession of Pharmacy Technology. The practicum learning environment is one in which the student is expected to progress in level of competence.

STANDARD

From entry into the practicum setting, through completion, the student is expected to practice in a safe and responsible manner regarding him/herself, the patient/client and the environment. The Pharmacy Technology student professional, participating as a member of the health care team, is responsible for contributing to the continuity of care, and maintenance of client safety and welfare throughout the practicum experience.

- Prior to entering the practicum experience, the student will have demonstrated in the classroom and laboratory, the necessary knowledge and skill being required in the current clinical/practicum setting.
- Prior to entering the practicum experience, the student will have submitted evidence of: negative TB test, current immunizations, CPR certification, negative drug test, negative criminal background check & professional liability and medical insurance and Texas State Board of Pharmacy registration as a pharmacy technician trainee.
- The student will not enter the practicum or classroom setting when he/she has an impairment or illness that is or may be harmful or infectious to others.
- While in the practicum setting the Pharmacy Technology student will:
 - ◆ Meet the Professional Standards of Practice set forth by the American Society of Health System Pharmacists and the Texas Board of Pharmacy in performing all academic and practicum work in the Pharmacy Technology program.
 - ◆ Meet the standards for students as set forth by South Texas College, the Nursing and Allied Health Division Student Handbook and the Pharmacy Technology Program Handbook.
 - ◆ Meet the learning objectives for practicum as set forth by the American Society of Health System Pharmacists.
 - ◆ Arrive at the practicum site on time, sign in on time, report off to the person responsible for the student's supervision any time the student leaves the practicum site, sign out on time when leaving the practicum site.
 - ◆ Provide only care which the student has been deemed competent to perform, utilizing the level of supervision appropriate to the circumstance outlined in the practicum guidelines.
 - ◆ All hours for practicum courses must be performed at the practicum site to which the student is assigned by the practicum instructor. These hours must be verified on the practicum documentation forms by the practicum preceptor's signature.
 - ◆ Students may not be assigned to pharmacy practicum sites at which they are also employed.

- ◆ Pharmacy technician hours resulting from gainful employment will not count towards practicum hours.
- ◆ Students who represent themselves as couples, married or not married, will be assigned to separate practicum sites as requested by the Program's clinical affiliates.
- ◆ The student should have received theoretical knowledge, and practice of procedures prior to performing that procedure in the practicum setting.
- ◆ Each practicum site has a Policy and Procedure Manual that is readily accessible for reference. The student is responsible for performing procedures as outlined in the Manual.
- ◆ Skill Checklists will be given to each student in conjunction with practicum rotations. The student is responsible for using the Skills Checklist as directed.
- ◆ Students are directly responsible both to the practicum site preceptor and the practicum instructor. Students must seek their supervision or advice as the situation indicates.
- ◆ Students must meet the STC Pharmacy Technology Professional Appearance Standard at all times when visiting the practicum site. Under no circumstances will the students wear any badge, jacket, shirt or other uniform containing a practicum site's name or logo.
- ◆ Students will not mix, compound, prepare, label or distribute any medication except under direct supervision of a practicum preceptor. Students will NOT perform any activity that is strictly the legal and professional responsibility of the pharmacist.
- ◆ All activities performed by a student must be under the direct supervision of a practicum preceptor.
- ◆ Students WILL NOT leave practicum site premises during practicum hours without the preceptor's permission. Students WILL NOT make deliveries to patient's homes or work sites, other pharmacies or institutions.
- ◆ Students may be asked to answer telephones at the practicum site and will follow the telephone protocols set forth by the practicum preceptor.
- ◆ Students will not take verbal orders/prescriptions of any kind. These calls should immediately be transferred to the pharmacist.
- ◆ The student will not document on any permanent pharmacy records.
- ◆ Students will not witness permits or any legal document related to the practicum site or patient care.
- ◆ Students may not make or receive personal phone calls at the practicum site. However, on their breaks or at lunch they may use public phones to make calls. In emergencies, family members need to call the STC Pharmacy Technology Department so the practicum instructor may be contacted about the emergency and inform the student.
- ◆ **No pagers or cell phones allowed**, in practicum settings.
- ◆ All practicum student STC paper work must be properly documented and signed both by the student and the practicum site preceptor. Any falsification of data on practicum forms will result in an immediate conference with the practicum instructor and Program Chair. Falsification of information on practicum forms may result in immediate failure of the practicum course and

dismissal from the program. All clinical issues will be reviewed by the NAH Clinical Affairs Committee.

- ◆ Students are reminded that any and all information about any patient's condition is confidential and should not be discussed with anyone neither working in the practicum site nor employed by the STC Pharmacy Technology Program.
- ◆ Medical records should only be read by those directly providing care to a patient or client. The records of other patients/clients, friends, family members, relatives, coworkers, etc. should not be read. Under no circumstances should clinical records be photo copied or photographed.
- ◆ Under no circumstances should student take photographs in the classroom or laboratory or on the practicum site premises.
- ◆ Gum chewing not only looks unprofessional, but also interferes with clear communication and can be extremely offensive to others. Gum chewing will NOT be allowed while in uniform or scrub attire on practicum/school premises.
- ◆ Family visitors or friends are not allowed at the practicum site. The practicum preceptor may ask student's visitors to leave the premises.

PROFESSIONAL APPEARANCE STANDARD

Our patients and practicum sites have the right to expect a clean, pressed uniform in good repair. The uniform must be worn for practicum as well as class. While in uniform the student must comply with all aspects of the guidelines for professional appearance such as hair jewelry, etc. During practicum, the student must follow the Pharmacy Technology Program Professional Appearance Standard (as per Pharmacy Technology Student Handbook) at all times while participating in program activities and attending the practicum site.

FAILURE TO MEET THE STANDARDS

The failure of the Pharmacy Technology student to meet any part of the above standards will cause action to be taken by the practicum instructor, Program Chair and Division of Nursing and Allied Health Dean. The minimal action to be taken will be a written report and reprimand. The maximum action may be immediate failure and removal from the practicum course. The action taken will be dependent on the nature of the incident and potential or real threat to client safety and well being or risk for the clinical affiliate agency.