Orlando College of Osteopathic Medicine

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Policy Title: Student Social Media and Use of Institutional Identifiers Policy

Policy & Procedure Statement:

Social media and digital communication platforms are an integral part of modern communication and professional networking. The KPGU/OCOM Office of Communications & Marketing oversees all **Official University/OCOM Accounts** across social media platforms, including, but not limited to, Facebook, Twitter/X, Instagram, Threads, TikTok, LinkedIn, YouTube, Vimeo, Snapchat, Reddit, Discord, GroupMe, and WhatsApp.

This policy establishes clear, objective expectations for students' online conduct when connected to their role as future healthcare professionals and for their use of the University's and College's names, logos, apparel, and identifying marks:

- To provide clear guidelines outlining how student-doctors and KPGU students can celebrate their academic journey and engage online in an ethical, professional manner while preventing online misconduct from harming patients, peers, KPGU, OCOM, or our clinical, hospital, and community partners.
- To distinguish clearly between Official University/OCOM Accounts, Recognized Student Organization (RSO) accounts, and students' independently operated personal accounts and peer study groups.

- To ensure KPGU/OCOM student-doctors act legally, ethically, and responsibly in protecting the privacy and confidentiality of patients, standardized patients, anatomical donors, fellow students, faculty, staff, and families in accordance with the Health Insurance Portability and Accountability Act (HIPAA), the Family Educational Rights and Privacy Act (FERPA, Policy D046), and the Florida Information Protection Act (FIPA).
- To help student-doctors protect their own Good Professional Standing (OCOM Policy D002), COMLEX-USA eligibility (OCOM Policy D038), clinical rotation placements, residency match prospects, and future medical licensure.
- To support institutional alignment with applicable standards and rules of the Higher Learning Commission (HLC), the American Osteopathic Association Commission on Osteopathic College Accreditation (COCA), the Florida Commission for Independent Education (CIE, Chapter 1005, Florida Statutes; Chapter 6E, Florida Administrative Code), and applicable federal and state laws.

Scope of Policy / Persons Covered by Policy (Professional Standards & Nexus Threshold):

This policy applies to all students of KPGU and OCOM in every academic program and modality (on-campus, clinical rotation, online, and hybrid), from matriculation through graduation or separation, including students on Leave of Absence (Policies D060 and D062), Academic or Conduct Probation, Academic Suspension, or Modified Course of Study.

Threshold for Application to Personal Online Activity: While this policy applies across public and private digital platforms (including posts, photos, videos, audio, stories, and group chats), KPGU/OCOM does not regulate purely private, lawful personal expression outside school hours that has no bearing on the institution or the medical profession. Enforcement under this policy is limited to online activity that: (1) displays or utilizes Institutional Identifiers or Clinical Site Identifiers in a manner prohibited by Sections 2 through 4; (2) discloses Protected Information (HIPAA PHI, FERPA student records, anatomical donor data, or secure exam materials) under Section 5; (3) targets, harasses, threatens, or mistreats members of the KPGU/OCOM or Affiliated Partner community; or (4) violates clearly defined medical ethics, patient safety, or legal standards set forth in Section 6 that directly implicate a student-doctor's fitness to practice medicine under OCOM Policy D002 and OCOM Policy D084.

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DEFINITIONS:

- **Social Media / Online Activity –** Includes all websites, applications, and digital platforms through which users create, share, or interact with user-generated content, including Facebook, Instagram, TikTok, Twitter/X, Threads, Snapchat, YouTube, Vimeo, LinkedIn, Reddit, Discord, GroupMe, WhatsApp, Pinterest, podcasts, blogs, forums, and review sites.
- **Institutional Identifiers –** The names "Drs. Kiran and Pallavi Patel Global University," "KPGU," "Orlando College of Osteopathic Medicine," "OCOM," official logos, seals, trademarks, and slogans (Policy D065); University/College Apparel; student ID badges and lanyards; recognizable restricted campus simulation suites, OMM labs, and anatomy labs; and account names or bios that explicitly reference KPGU or OCOM.
- **University / College Apparel –** Any clothing, clinical attire, or accessory bearing an Institutional Identifier, including University-issued or program-required white coats, scrubs, lab coats, polos, patches, and pins, as well as branded merchandise (shirts, hoodies, hats, bags, lunchboxes, and similar items governed by Policy D074).
- **Affiliated Partner –** Any hospital, health system, clinic, physician office, agency, or organization with which KPGU/OCOM places students for clinical rotations, clerkships, early clinical experiences (Policy D077), preceptorships, externships, or community service.
- **Clinical Site Identifiers –** The name, logo, signage, ID badges, uniforms, electronic health record (EHR) screens, patient-care areas, or other identifying features of an Affiliated Partner.
- **Protected Information –** Protected Health Information (PHI/ePHI) under HIPAA (45 C.F.R. Parts 160 and 164) and Fla. Stat. § 456.057; student education records under FERPA (20 U.S.C. § 1232g; Policy D046); personally identifiable information under FIPA (Fla. Stat. § 501.171); anatomical donor records and imagery; proprietary lecture and secure exam/OSCE/COMAT/COMLEX-USA materials (Policies D002, D075, D076); and confidential institutional records (Policy B005).
- **Official University / OCOM Account –** A social media account, page, or channel created, owned, and authorized by the KPGU/OCOM Office of Communications & Marketing to represent the University or College officially.
- **Professionalism –** Conduct aligned with OCOM Policy D002 (Professionalism Policy & Procedures), the Eight Tenets of Professionalism, the OCOM Student Honor Code, OCOM

Policy D084 (Student Progress & Professionalism Policy), and the American Osteopathic Association (AOA) Code of Ethics.

POLICY:

As an educational institution, KPGU and OCOM encourage students to take pride in their academic accomplishments and engage constructively in professional and peer communities online. When utilizing social media in a manner connected to KPGU/OCOM, clinical training, or the medical profession, student-doctors are expected to uphold the ethical and legal standards of osteopathic medicine.

1. Official KPGU/OCOM Accounts, Student Organization Pages, and Independent Student Accounts

1. **a. Contact for Brand and Account Questions:** Questions regarding Official University/OCOM Accounts or brand guidelines may be directed to the Director of Communications & Marketing at rfreeman@ocom.org or the Associate Dean for Student Services.
2. **b. Distinction Between Official Accounts, RSO Pages, and Independent Student Accounts:**
    1. **Official University/OCOM Accounts:** KPGU/OCOM officially owns only those accounts created by or on behalf of the University, the College, or an official academic/administrative department. KPGU/OCOM does not claim ownership of students' personal social media profiles simply because a student identifies themselves as an OCOM student-doctor.
    2. **Recognized Student Organization (RSO) Accounts (Policy D066):** Official social media pages for registered student clubs and organizations must be registered with the Associate Dean for Student Services and the Office of Communications & Marketing, supervised by the organization's faculty advisor, and clearly titled to reflect their status as a student organization (e.g., *"OCOM [Club Name] – Student Organization"*).
    3. **Informal Class Study and Discussion Groups:** Students are permitted to create and participate in independent, student-run peer study groups and class communication channels (e.g., on Discord, GroupMe, WhatsApp, or Slack) without

transferring ownership to the University, provided such groups do not use official University seals/logos to impersonate an official administrative channel and clearly state in their group description that they are unofficial and student-run.

3. **c. Prohibition on Impersonating Official Institutional Channels:** No student or group may create a public-facing social media page or handle that uses official KPGU/OCOM seals or trademarks (Policy D065) in a manner that misleads the public into believing the account is an Official University/OCOM Account.
4. **d. Review of Unauthorized Impersonating Accounts:** If an unauthorized public account is created that impersonates an Official University/OCOM Account or misuses official University trademarks without approval under Policy D065 or Policy D066, the Office of Communications & Marketing and the Associate Dean for Student Services may require the account name or branding to be amended to remove institutional confusion, or require an unauthorized impersonating page to be discontinued.
5. **e. Official Academic and Administrative Communication Channels:** Social media platforms and student group chats (such as Discord, GroupMe, Instagram, or Facebook) are NOT official channels for academic or administrative notifications. Official email (@ocom.org / @kpgu.org) and the official Learning Management System (Leo / Elentra, Policy D078) are the sole official lines of academic and administrative communication between faculty, staff, and students.
6. **f. Internal University-Managed Groups:** Access to official KPGU/OCOM-managed internal groups is limited to enrolled students, faculty, administrative staff, and official alumni.

2. Permitted Uses of Institutional Apparel, White Coats, Tagging, and Institutional Identification

KPGU/OCOM is proud of its student-doctors and encourages students to celebrate their medical education and institutional pride. Students are expressly **PERMITTED** to wear University/College Apparel and reference their KPGU/OCOM affiliation in the following ways, provided the content complies with Sections 4, 5, and 6 of this policy:

- **a. Ordinary Personal, Academic, and Milestone Photographs in OCOM Apparel:** Students are permitted to post personal photographs and videos wearing University/College Apparel—including OCOM white coats, branded scrubs, polo shirts,

hoodies, t-shirts, hats, and student ID badges—when celebrating academic milestones (such as the White Coat Ceremony under Policy D067, Commencement and Hooding under Policy D058, pinning ceremonies, research symposiums, and community service events) as well as in ordinary, respectful personal, family, or peer photographs on campus or in daily life;

- **b. Biographical Identification, Tagging, and Campus Location Tags:** Students are permitted to state their enrollment and degree candidacy (e.g., *"Osteopathic Medical Student [OMS-I/II/III/IV], Orlando College of Osteopathic Medicine"*) on résumés, CVs, ERAS applications, LinkedIn, and personal social media bios, and are permitted to tag official KPGU/OCOM accounts, use school hashtags, and use campus geolocation tags in lawful, professional, and ordinary personal posts; and
- **c. Sharing and Commenting on Public Institutional News:** Students are permitted to share or repost official news published by KPGU/OCOM and to express their personal opinions, commentary, or good-faith perspectives regarding publicly available institutional information, provided they do not alter official announcements to fabricate a false institutional statement or engage in unlawful defamation or harassment.

3. Prohibited Misuse of Institutional Identifiers and University/College Apparel

While ordinary pride and milestone posts are welcomed under Section 2, a student's display of OCOM white coats, apparel, or Institutional Identifiers carries a responsibility not to associate the College or the osteopathic medical profession with dangerous, unethical, or unlawful conduct. Students may **NOT** wear, display, or include Institutional Identifiers or University/College Apparel (including OCOM white coats, scrubs, badges, or branded items such as lunchboxes/bags) in any online post, video, or profile that:

- **a.** Depicts, brandishes, or promotes firearms, tactical weaponry, explosives, or threats of violence, or pairs clinical attire/identifiers with rhetoric suggesting harm, mockery, or disrespect toward psychiatric or clinical patients;
- **b.** Violates clinical rotation, laboratory, or HIPAA/FERPA confidentiality rules under Sections 4 or 5, or violates any prohibited unprofessional behavior standard under Section 6 (such as illegal substance/marijuana use, intoxication, obscenity/vulgarity, discrimination, harassment, or hazing);
- **c.** Uses official KPGU or OCOM logos, seals, or trademarks (Policy D065) to impersonate

an official University account in a username/handle or to promote unauthorized commercial endorsements, monetized influencer campaigns, crowdfunding, or political endorsements without written approval (Policy D074); or

- **d.** Falsely states or implies that the student is speaking officially on behalf of KPGU, OCOM, or an Affiliated Partner.

Targeted Remediation of Violating Posts: If a specific post or video violates this Section, the student must promptly remove the violating post or remove the Institutional Identifiers from that post (and, if an entire account is predominantly dedicated to prohibited commercial, obscene, or violent content under Section 6, remove KPGU/OCOM identifiers from the account bio). However, the presence of an isolated disputed post on a personal account does not retroactively render unrelated, ordinary milestone photos on the same account a policy violation.

4. Clinical Rotations, Clerkships, Preceptorships, and Campus Laboratories

Because Affiliated Partners entrust student-doctors with vulnerable patients and control access to their clinical facilities under Master Affiliation Agreements (COCA Element 11.1), online activity connected to clinical sites and campus laboratories is held to strict patient-privacy and facility rules:

- **a. Prohibition on Unauthorized Clinical and Lab Recording:** Students may not take, record, post, or transmit photographs, video, or audio inside any Affiliated Partner's patient-care areas, or inside any OCOM Anatomy Lab (cadaveric donor facilities), Osteopathic Manipulative Medicine (OMM) Lab, Clinical Skills/Simulation Center, or OSCE room (Policies D002, D075, and D084; Fla. Stat. § 934.03), unless expressly authorized in writing by the clinical site and OCOM for an official educational purpose;
- **b. Use of Clinical Site Identifiers and Permitted Professional Exceptions:** Students may not post photos displaying restricted Clinical Site Identifiers (such as hospital ID badges, EHR computer screens, patient-care corridors, or clinical site logos) in unauthorized personal social media content. **Permitted Exceptions:** Students ARE permitted to list the factual name of an Affiliated Partner/hospital rotation on their curriculum vitae (CV), ERAS residency application, or professional networking profile (such as LinkedIn), and may share pre-approved milestone or recognition photographs taken in non-clinical public areas when expressly permitted by the Affiliated Partner's policy;

- **c. Absolute Protection of Patient and Standardized Patient Privacy:** Students may never post, describe, or comment online about specific patients, standardized patients, clients, or their families—even if the student believes the narrative is "de-identified" or "anonymous"—without valid written HIPAA and institutional authorization;
- **d. Clinical Site Geolocation in Patient Areas:** Students should not use real-time geolocation check-ins from restricted patient-care units where doing so violates the Affiliated Partner's security or patient-privacy rules; and
- **e. Patient Social Media Boundaries and Pre-Existing Relationship Exception:** Students may not initiate, accept, or maintain personal social media connections or private messages with current or former patients or standardized patients encountered through their clinical training. **Exception for Pre-Existing Relationships:** This prohibition does not apply to pre-existing familial, spousal, or established personal/community relationships that existed prior to and independent of the student's clinical training, provided the student strictly observes HIPAA confidentiality and any required clinical recusal rules.

Students must also comply with each Affiliated Partner's own social media and confidentiality policies. Where a clinical site's policy is more restrictive than this policy, the clinical site's policy governs while the student is assigned to that site.

5. Confidentiality, Privacy (HIPAA / FERPA / FIPA), Two-Party Recording Consent, and Intellectual Property

- **a. HIPAA and Medical Record Privacy:** Students may never post or transmit Protected Information. Under HIPAA (45 C.F.R. Parts 160 and 164) and Fla. Stat. § 456.057, clinical descriptions or images are strictly prohibited whenever details (such as a condition, demographic, date, hospital site, or unique clinical circumstance) could reasonably allow any person to identify the patient or facility.
- **b. FERPA and Peer Privacy:** Under FERPA (Policy D046), students' home addresses, telephone numbers, grades, class rankings, disability accommodations (Policy D055), and SPPC proceedings (Policy D084) must never be disclosed online.
- **c. Florida Two-Party Recording Consent:** In compliance with OCOM Policy D075 and Florida's two-party recording consent statute (Fla. Stat. § 934.03), students may not record or post audio or video of private conversations, advising meetings, SPPC hearings, small-group sessions, or clinical encounters without the prior consent of all recorded

parties.

- **d. Academic Copyright and Secure Examinations:** Students must honor copyright and intellectual property laws (17 U.S.C. § 101 et seq.) and may not upload or distribute faculty lecture recordings, slides, or lab videos, nor share, solicit, or reconstruct internal exam, quiz, OSCE, COMAT, or NBOME COMLEX-USA assessment items (Policies D002, D075, and D076).

6. Specific Prohibited Unprofessional Online Behaviors and Objective Catch-All Standard

Consistent with OCOM Policy D002 and OCOM Policy D084, the following specific online behaviors violate the ethical and professional standards required of student-doctors:

- **a. Breaches of Patient Privacy and Respect for Anatomical Donors:** Posting or transmitting any patient's name, image, audio, medical record, or clinical encounter narrative; accessing patient charts without clinical authorization ("curiosity snooping"); or photographing, disrespecting, or making derogatory remarks about anatomical donors, cadaveric specimens, or standardized patients (Policy D002);
- **b. Obscene or Non-Consensual Sexually Explicit Content:** Posting obscene or pornographic content on any account associated with KPGU/OCOM, accessing pornography on KPGU/OCOM campuses or equipment, or engaging in non-consensual distribution of sexually explicit or AI-manipulated intimate imagery ("revenge porn" / deepfakes, Fla. Stat. § 784.049);
- **c. Threats of Violence, Illegal Weapons Misuse, and Prohibited Substances:** Communicating credible threats of physical violence, terrorism, vandalism, or harm toward patients, peers, or the campus community (Policy D019); brandishing or depicting firearms or weapons in connection with clinical attire, institutional identifiers, or patient-care rhetoric; depicting or promoting unlawful drug use, prescription medication misuse, or the use of marijuana/cannabis in any form (which remains a prohibited controlled substance under federal law and is prohibited for all OCOM students under Policies D002 and D084 regardless of state legalization); or depicting substance impairment affecting academic or clinical duties;
- **d. Unlawful Harassment, Discrimination, Cyberstalking, and Title IX Misconduct:** Harassing, threatening, cyberstalking (Fla. Stat. § 784.048), intimidating, or discriminating against any person on the basis of race, ethnicity, color, sex, pregnancy, sexual orientation,

gender, gender identity, national origin, age, disability, religion, or veteran status (Policy D001); or engaging in Title IX sexual harassment (Policy D056);

- **e. Hazing and Coercion:** Organizing, encouraging, or depicting any online or physical hazing of students in violation of Florida's Chad Meredith Act (Fla. Stat. § 1006.63) and OCOM Policy D019 (Section 5.3);
- **f. Credential Misrepresentation and Unlicensed Practice of Medicine:** Misrepresenting academic credentials, degree status, or licensure online (for example, holding oneself out as a licensed "Doctor," "DO," or "Physician" prior to graduation and licensure rather than "Student-Doctor" or "OMS-I/II/III/IV"); or offering individualized medical diagnosis or treatment advice online without a license (Fla. Stat. Ch. 459);
- **g. Academic Dishonesty and Assessment Compromise:** Cheating, plagiarizing, falsifying clinical logs, inputting confidential patient or exam data into unauthorized public generative AI tools (Policy D090), or sharing/reconstructing secure exam, OSCE, COMAT, or COMLEX-USA items;
- **h. Non-Consensual Recording and Doxxing:** Capturing or posting audio, video, or images of lectures, small-group sessions, advising meetings, SPPC hearings, or clinical encounters without prior written consent (Policy D075; Fla. Stat. § 934.03), or doxxing/publishing private home addresses or phone numbers of students, faculty, or staff;
- **i. Impersonation and Malicious Defamation:** Impersonating or falsely claiming to speak officially for KPGU, OCOM, an Affiliated Partner, or any University official, faculty member, or student; or publishing maliciously false and defamatory statements of fact (made with knowing falsity or reckless disregard for the truth) regarding KPGU, OCOM, its employees, students, or Affiliated Partners;
- **j. Unauthorized Commercial Endorsements Using Institutional Identity:** Using KPGU/OCOM logos, seals, or clinical attire to promote commercial products, medical supplements, crowdfunding, or monetized accounts without prior written authorization (Policies D065 and D074; FTC Endorsement Guides, 16 C.F.R. Part 255);
- **k. Boundary Violations and Retaliation:** Pursuing prohibited romantic or sexual relationships online with supervising faculty, staff, preceptors, or patients (Policies D002 and D098); or retaliating against any individual who reports a suspected policy, Honor Code, or safety concern in good faith (Policy D027); and
- **l. Objective Standard for Other Severe Unenumerated Professionalism Breaches:**

Other unenumerated online conduct within the Scope of this policy that objectively and substantially violates specific provisions of OCOM Policy D002 (Professionalism Policy & Procedures), the OCOM Student Honor Code, the AOA Code of Ethics, or OCOM Policy D084 by: (1) posing an articulable threat to patient, peer, or campus safety; (2) breaching a legal, regulatory, or confidentiality duty; or (3) causing material disruption to the educational or clinical learning environment. Where prohibited misconduct is accompanied by the display of KPGU/OCOM Institutional Identifiers or Clinical Site Identifiers, that display may be considered as an aggravating factor by the SPPC under Policy D084.

7. Speaking on Behalf of KPGU/OCOM and Media Inquiries

Only authorized University personnel may speak officially on behalf of KPGU or OCOM. Students may not state or imply that their personal views represent the official position of KPGU or OCOM. Media inquiries regarding official University positions must be referred to the Office of Communications & Marketing at rfreeman@ocom.org (Policy D009).

8. Clinical Placement Consequences and Individualized Review

- **a. External Review of Online Presence:** Affiliated Partners, residency program directors, licensing boards (including the NBOME and Florida Board of Osteopathic Medicine), and military scholarship authorities routinely evaluate applicants' public online conduct.
- **b. Authority of Affiliated Partners:** Under Master Affiliation Agreements, an Affiliated Partner reserves the independent right to decline, suspend, or terminate a student's clinical rotation placement at its facility based on the student's online conduct.
- **c. Individualized Review for Alternative Clinical Placements:** If an Affiliated Partner declines or removes a student from a clinical placement due to a social media or professionalism concern, the Associate Dean for Clinical Education and the Associate Dean for Student Services (in coordination with the SPPC under Policy D084) will conduct an **individualized review** of the circumstances, the severity of the conduct, and the student's remediation progress. Where clinically and professionally appropriate, OCOM will make reasonable efforts to arrange an alternative clinical placement; however, students are advised that availability at partner sites is not guaranteed and that severe, un-remediable, or repeated removals by Affiliated Partners may delay academic progression or result in referral to the SPPC for potential suspension or dismissal.

- **d. Impact of Conduct Probation on Good Professional Standing:** Under OCOM Policies D002, D038, and D084, students placed on Conduct/Disciplinary Probation are not in Good Professional Standing during the probationary term, which affects eligibility to sit for COMLEX-USA examinations, hold student organization office, receive institutional travel funding, or serve as a Teaching Assistant, and is reportable on the Medical Student Performance Evaluation (MSPE) in accordance with Policy D084.

9. Privacy Safeguards, Content Removal Directives, and Review Mechanism

- **a. Student Privacy Safeguards:** KPGU/OCOM does not routinely monitor students' private personal online accounts and **will never demand or compel a student to disclose personal social media passwords, login credentials, or private account access**. The University investigates potential violations only when credible information is lawfully brought to its attention.
- **b. Objective Criteria and Review Process for Content Removal:**
    1. **Immediate / 24-Hour Removal for Objective High-Harm Violations:** When online content constitutes an objectively verifiable, urgent violation—such as an unauthorized disclosure of HIPAA PHI or FERPA records, a non-consensual recording (Fla. Stat. § 934.03), a credible threat of violence, unauthorized use of official University seals, or a mandatory takedown request by an Affiliated Partner—the Associate Dean for Student Services (or the Associate Dean for Pre-Clinical/Clinical Education) may direct the student in writing to remove the violating content immediately or within twenty-four (24) hours.
    2. **Review Process for Disputed Determinations:** Where an alleged violation involves a non-emergency or disputed judgment regarding professionalism, the student shall receive written notice of the specific policy provision at issue and an opportunity to be heard by the Associate Dean for Student Services (and/or the SPPC under Policy D084) before a final disciplinary sanction or permanent removal order is imposed.

10. Disciplinary Authority, SPPC Due Process (Policy D084), and Standards for Dismissal

- **a. Clear Separation of Roles (No Disciplinary Authority in Marketing): The Office of Communications & Marketing has NO authority to make student disciplinary determinations or impose sanctions on students.** If Communications & Marketing

personnel observe or receive a report of a potential student violation of this policy, they must refer the matter to the Associate Dean for Student Services. All student disciplinary reviews, referrals, hearings, and sanctions are governed exclusively through the Office of Student Services, the Office of Pre-Clinical or Clinical Education, the Student Progress and Professionalism Committee (SPPC), and the Dean under OCOM Policy D084 (Student Progress & Professionalism Policy) and OCOM Policy D002 (Professionalism Policy & Procedures). Allegations of Title IX sexual harassment are governed by Policy D056.

- **b. Full Student Due Process and Graduated Sanctions under Policy D084:** In accordance with OCOM Policy D084, every student referred to the SPPC is guaranteed written notice of the hearing and alleged infraction, a mandatory pre-meeting consultation with the Associate Dean for Student Services, the right to submit written statements and present orally to the committee, an impartial evaluation by the SPPC (which serves as an independent recommending body evaluating Minor, Moderate, Major, and Critical Infractions), a written initial decision by the appropriate Associate Dean (Pre-Clinical Education, Clinical Education, or Student Services), and the right to submit a written appeal to the Dean/Chief Academic Officer within five (5) business days. Depending on the severity determination, sanctions may include a warning/reprimand, Conduct Admonition, remediation/reflection plan, loss of a clinical placement, Conduct/Academic Probation, Suspension, or Dismissal.
- **c. Defined Standards and Due Process for Immediate Suspension or Dismissal:** While minor or moderate infractions are addressed through educational remediation, admonition, or probation, severe violations (Critical Infractions) may result in interim protective suspension (under Policy D019/D082) and referral to the SPPC for dismissal, even on a first offense. Conduct sufficiently severe to warrant potential dismissal on a first offense is limited to egregious violations, including: willful or reckless disclosure of HIPAA Protected Health Information (PHI) or patient/anatomical donor imagery; non-consensual recording in clinical sites, OSCEs, or anatomy labs; credible online threats of physical violence, cyberstalking, hazing, non-consensual sexually explicit imagery, or severe harassment/discrimination; compromising secure licensing/COMLEX/OSCE exam items; felony misconduct; or severe misconduct causing an Affiliated Partner to terminate a clinical affiliation agreement. **No dismissal is ever summary or automatic:** any recommendation for dismissal requires a full SPPC hearing, an initial decision by the

appropriate Associate Dean, and full appellate rights to the Dean under Policy D084.

11. Regulatory and Accreditation Alignment and Protected Student Activity

This policy is designed to align with and support KPGU and OCOM's institutional obligations under the following accreditation standards and statutory frameworks:

- **a. Higher Learning Commission (HLC) Alignment:** Supports alignment with HLC Criteria for Accreditation (CRRT.B.10.010, Criterion 2: Integrity — Ethical and Responsible Conduct) and HLC Assumed Practices (CRRT.C.10.010) by establishing transparent student conduct expectations and fair due process procedures.
- **b. Commission on Osteopathic College Accreditation (COCA) Alignment:** Supports alignment with AOA COCA Continuing Accreditation Standards, including Element 1.4 (Non-Discrimination), Element 1.5 (AOA Code of Ethics), Element 5.1 (Professionalism and Learning Environment), Element 9.2 (Academic and Professionalism Standards / SPPC Due Process under Policy D084), Element 9.3 (Student Grievances under Policy D081), Element 9.4 (FERPA Student Records under Policy D046), and Element 11.1 (Clinical Education Affiliation Agreements).
- **c. Florida Commission for Independent Education (CIE) Alignment:** Supports alignment with KPGU's licensure by the Florida Commission for Independent Education (License No. 10184), Chapter 1005, Florida Statutes (§§ 1005.04 and 1005.31), and Chapter 6E, Florida Administrative Code (Rules 6E-1.0032 and 6E-2.004(6)).
- **d. Federal and State Statutory References:** Supports institutional compliance obligations under HIPAA/HITECH (45 C.F.R. Parts 160, 162, and 164), FERPA (20 U.S.C. § 1232g; 34 C.F.R. Part 99), Title IX of the Education Amendments of 1972 (20 U.S.C. § 1681; 34 C.F.R. Part 106), Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act and the Americans with Disabilities Act (ADA), the Federal Copyright Act (17 U.S.C. § 101 et seq.), FTC Endorsement Guides (16 C.F.R. Part 255), and Florida Statutes §§ 456.057 (medical record confidentiality), Ch. 459 (Osteopathic Medicine), 501.171 (FIPA), 760.01 (Florida Civil Rights Act), 784.048 (Cyberstalking), 784.049 (Sexual Cyberharassment), 934.03 (Two-Party Recording Consent), and 1006.63 (Anti-Hazing).
- **e. Protected Student Activity Savings Clause:** Nothing in this policy prohibits speech or activity protected by applicable law; restricts students from reporting suspected misconduct, student mistreatment, safety concerns, Title IX violations (Policy D056),

student grievances (Policy D081), or accreditation complaints (Policy D037) through University, accreditor (HLC, COCA, CIE), or government channels; or prevents students from engaging in peaceful assembly (Policy D093) or expressing good-faith personal opinions regarding their educational experiences, provided Protected Information is not disclosed.

12. Respective Roles and Governance Responsibilities

- **Students –** Comply with this policy and applicable Affiliated Partner policies; protect patient and peer privacy; and remove specific violating content when directed pursuant to Section 9.
- **Faculty, Preceptors, and Clinical Coordinators –** Review clinical and laboratory confidentiality expectations with students and refer suspected student violations to the Associate Dean for Student Services.
- **Office of Communications & Marketing (rfreeman@ocom.org) –** Create, own, and manage Official University/OCOM Accounts; review requests to use official University trademarks/seals under Policy D065; moderate official University pages using the objective criteria below; and refer any suspected student conduct violations to the Associate Dean for Student Services (Communications & Marketing does not adjudicate student discipline).
- **Associate Dean for Student Services (and Pre-Clinical / Clinical Associate Deans) –** Receive and review reports of potential student violations; issue content removal directives under Section 9; refer professionalism infractions to the SPPC; and serve as the designated initial decision authority on SPPC recommendations under Policy D084.
- **Student Progress and Professionalism Committee (SPPC) –** Conduct impartial, closed professionalism hearings and recommend corrective actions or sanctions in accordance with OCOM Policy D084.
- **Dean & Chief Academic Officer –** Serve as the final appellate authority for student appeals of SPPC/Associate Dean determinations within five (5) business days under OCOM Policy D084.

Conclusion and Objective Moderation Standards for Official Pages

Drs. Kiran and Pallavi Patel Global University and the Orlando College of Osteopathic Medicine encourage positive interaction among users on Official University/OCOM Accounts but are not

responsible for content published on unaffiliated personal accounts or unofficial student channels. Views expressed by guest posters do not reflect those of KPGU or OCOM.

- **Objective Comment Moderation Criteria on Official Pages:** To maintain a lawful and safe forum on Official University/OCOM Accounts, authorized Communications & Marketing personnel reserve the right to remove comments or posts on official institutional pages only when they violate objective moderation standards—specifically posts that: (a) disclose HIPAA Protected Health Information or FERPA-protected student records; (b) contain unlawful hate speech, racial/discriminatory slurs, threats of violence, harassment, or obscenity/pornography; (c) advocate illegal activity or violate copyright/intellectual property laws; (d) contain commercial spam, malware links, or unauthorized commercial solicitations; or (e) constitute defamatory falsehoods or targeted personal attacks on identifiable individuals. Comments will not be removed merely because they express a critical or unfavorable opinion regarding institutional policies.

Personnel from KPGU/OCOM thank you for your compliance and assistance in fostering a safe, professional, and vibrant medical school community.

This policy shall be posted at ocom.org/policies.