



Massachusetts School Catalog

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Introduction

Intelvio, LLC is a medical training institution dedicated to providing exceptional education and training for individuals aspiring to pursue a growing variety of rewarding careers in healthcare. Phlebotomy Training Specialists (hereinafter referred to as PTS) is one the names Intelvio, LLC goes under when offering one of its premier training programs, specializing in comprehensive phlebotomy education. PTS is committed to equipping students with the knowledge, skills, and hands-on experience necessary to excel in the field of phlebotomy. Through expert instruction, practical training, and a student-focused approach, PTS prepares graduates for successful careers in healthcare while maintaining the highest industry standards.

Brian Treu is the Chief Executive Officer (hereinafter referred to as CEO) and founder of PTS. Mr. Treu has been drawing blood for 23 years and has completed over 300,000 blood draws during his career in medicine which includes completing 255 clinical research trials in Phases I-IV in all facets of medicine, specializing in Phase I clinical trials. Mr. Treu loves pressure and has an uncanny way of dealing with stressful situations. He has traveled the world performing venipuncture on patients on all 7 continents.

Alexis Treu is the Chief Operations Officer (hereinafter referred to as COO) of PTS. Ms. Treu has broad experience as the Chief Operating Officer level, having served in this capacity since 2017. Her extensive understanding of career school operational functions, as well as that of diverse and complicated state licensure requirements enables her to ensure full program compliance across the country.

David Roberts is the Chief Financial Officer (hereinafter referred to as CFO). Mr. Roberts's responsibilities are to ensure the company is operating in Generally Accepted Accounting Principles (GAAP) manner. He coordinates and manages all finance functions within the company; and, manages operational and investor relationships to ensure the company is operating in a legal and ethical manner. Mr. Roberts has an extensive background in supporting companies through post-sale transactions ensuring smooth and efficient operations. He has been a CFO for 10 years. Before his CFO duties, he has held numerous senior-level positions in both financial planning and analysis (FP&A) roles and in back-office controllership roles. He has an undergraduate degree in finance and a Master's in Business Administration (Finance) from the University of Utah.

Eden PTS Holdco LLC is an investment vehicle formed by Eden Capital on January 10, 2023 to acquire a controlling ownership interest of Intelvio Holdings LLC, which transaction was completed on March 31, 2023. After the completion of the transaction, Eden PTS Holdco LLC directly owns 55% of Intelvio Holdings, LLC. Eden Capital was founded in 2015 and is a private equity firm based in New York City with approximately \$200 million in assets under management. Eden Capital has extensive experience owning and operating post-secondary education providers in the healthcare, professional and skilled trades.

School History

Phlebotomy Training Specialists offers Phlebotomy Training for students and is staffed with qualified instructors. Mr. Treu recognized a need in the phlebotomy industry for hands-on training, so he founded Phlebotomy Training Specialists and created a program to deliver a system that consists of both practical and didactic learning. Students can leave the program feeling confident in their ability to enter the workforce as a phlebotomist. Since Phlebotomy Training Specialists inaugural class in 1993 with its first school in Utah, the company has expanded exponentially having over 87,000 graduates nationwide. Today Phlebotomy Training Specialists is one of the largest stand-alone phlebotomy training schools with over 100 school locations.

Mission and Objectives

Our mission is to increase the quality of the patient experience in the laboratory setting by delivering & implementing standardized, and consistently updated, training methodologies to students before their entrance into the clinical setting through our network of training facilities, which use the latest training paradigms and state of the art equipment.

Our objective is to turn out high-quality, well-trained, competent phlebotomists who can use their skills to benefit patients and employers.

Our current program meets the stated purpose above through a rigorous academic curriculum involving hands-on training. Our program equips students with the knowledge, technical proficiency, and foundation needed to excel. By preparing our students to provide safe, accurate, and compassionate blood collection draws, the program fulfills our mission.

Administration

Brian Treu – CEO & Founder

Alexis Treu – COO

David Roberts – CFO

Shauna Vorkink – CLO

Monica Sanborn – VP of Licensing & Compliance

Heidi Samani- Director of Student Services

Faculty

Instructor – Danielle Bartkowiak

Contact Information

School Addresses - 196 Boston Ave, Suite 2500, Medford, MA 02155

Home Office – 2570 W. 600 No, Ste 400, Lindon, UT 84042

Phone: **701-404-9434**

Fax: **385-327-2084**

Email: info@phlebotomyusa.com

Website: www.phlebotomyusa.com

Programs Offered

PHLB100 Phlebotomy Training:

80 Hours Didactic & Lab + 40 Hour Clinical Externship = Total 120 Hours

Program Cost

<u>Tuition</u>	<u>Tuition Deposit</u>	<u>Work Book</u>	<u>E-Book</u>	<u>Supplies & Equipment</u>
\$1,135.00	(\$150.00) *This amount will be credited toward the total tuition fee.	\$45.00	\$35.00	\$250.00

Total for Phlebotomy Training Program = \$1465.00

Payment Policy

Tuition for class should be paid by logging onto the student account at students.phlebotomyusa.com. We accept all major credit cards. A \$150 tuition deposit fee should be paid at the time of registration and will be credited to the full tuition. After paying this tuition deposit fee, students can make payments in any increment until full payment is received.

Full tuition and fees are due by the halfway point of the program unless the student is approved for financing and has signed a retail installment contract (see Financing Option below).

If a student unable to pay full tuition and fees by these deadlines, the following options are available:

1. If a student wishes to remain in their originally scheduled cohort but is unable to meet the payment policy as written, they can request a payment extension. They will need to make a written request to info@phlebotomyusa.com. The Director will review all payment extensions. If an extension is approved, the student will remain in their scheduled program but will be required to pay in full before challenging the practical exam.
2. If a student does not contact the Director, the student will be required to reenroll in a new scheduled cohort, attending the remaining courses in that cohort to complete their program. They will be required to be paid in full before joining their new cohort. Extensions past this point will not be permitted. Students should call Student Services to reschedule. Please note that rescheduling will be based on class availability.

Student Loans

Phlebotomy Training Specialists do not qualify for Federal Student Aid and do not provide student loans.

Estimate of Additional Expenses to Be Incurred by Student

Externship: Students will likely have to purchase medical scrubs for their clinical externship.

In the events a student misses all or part of their scheduled externship for ANY reason, they will be responsible for paying a rescheduling fee that may range from \$100-\$300, depending on the externship site, before they can reschedule in a new externship

National Exam: If a student decides to take the national phlebotomy certification exam through the National Healthcareer Association (NHA), Phlebotomy Training Specialists will collect a \$130 fee to cover a student's initial attempt.

Class Schedule

Evening: 6 pm to 10 pm – Monday to Friday (20 courses)

Day: 9 am to 1:00 pm – Monday to Friday (20 courses)

Weekend: 8 am to 4:30 pm – Saturdays (10 courses)

2025 Class Calendar

Month / Schedule	Class Dates
May Day	12, 13, 14, 15, 16, 19, 20, 21, 22, 27, 28, 29, 30, Jun 2, 3, 4, 5, 6, 9, 10
May Eve	12, 13, 14, 15, 16, 19, 20, 21, 22, 27, 28, 29, 30, Jun 2, 3, 4, 5, 6, 9, 10
June Day	16, 17, 18, 20, 23, 24, 25, 26, 27, 30, Jul 1, 2, 7, 8, 9, 10, 11, 14, 15, 16
June Eve	16, 17, 18, 20, 23, 24, 25, 26, 27, 30, Jul 1, 2, 7, 8, 9, 10, 11, 14, 15, 16
July / Aug / Sept Weekend	12, 19, 26, Aug 9, 16, 23, Sept 6, 13, 20, 27
July Day	21, 22, 23, 24, 25, 28, 29, 30, 31, Aug 1, 4, 5, 6, 7, 8, 11, 12, 13, 14, 15
July Eve	21, 22, 23, 24, 25, 28, 29, 30, 31, Aug 1, 4, 5, 6, 7, 8, 11, 12, 13, 14, 15
Aug Day	20, 21, 22, 25, 26, 27, 28, Sep 2, 3, 4, 5, 8, 9, 10, 11, 12, 15, 16, 17, 18
Aug Eve	20, 21, 22, 25, 26, 27, 28, Sep 2, 3, 4, 5, 8, 9, 10, 11, 12, 15, 16, 17, 18
Sept Day	24, 25, 26, 29, 30, Oct 1, 2, 3, 6, 7, 8, 9, 10, 14, 15, 16, 17, 20, 21, 22
Sept Eve	24, 25, 26, 29, 30, Oct 1, 2, 3, 6, 7, 8, 9, 10, 14, 15, 16, 17, 20, 21, 22
Oct / Nov / Dec Weekend	Oct 11, 18, 25, Nov 1, 8, 15, 22, Dec 6, 13, 20
Oct Day	27, 28, 29, 30, Nov 3, 4, 5, 6, 7, 10, 12, 13, 14, 17, 18, 19, 20, 21, 24, 25
Oct Eve	27, 28, 29, 30, Nov 3, 4, 5, 6, 7, 10, 12, 13, 14, 17, 18, 19, 20, 21, 24, 25
Dec Day (Accelerated)	1, 2, 3, 4, 5, 8, 9, 10, 11, 12

Holidays

Classes are not held on the following holidays:

- New Year's Eve
- Labor Day
- New Year's Day
- Thanksgiving Day & the Friday following
- Memorial Day
- Christmas Eve / Day
- Independence Day

Inclement Weather/Weather Emergencies

When an unexpected closure occurs due to extraordinary conditions, including inclement weather, students will be notified as soon as possible by phone call and text message.

Entrance Requirements

Phlebotomy Training Specialists do not discriminate based on race, sexual orientation, gender identity, religion, ethnic origin, or disability.

We require student to be beyond the age of compulsory high school attendance; over the age of 18. We also require our students, at minimum, to possess proof of a high School diploma or its equivalent. Some employers may also require similar proof for employment and it will be the student's responsibility to comply with employer requirements.

Equivalents to a school diploma may include a home-schooled diploma approved by the state's Department of Education, GED <http://www.gedtestingservice.com/ged-testing-service>, HiSet <http://hiset.ets.org>, and TASC <http://www.tactest/>.

If the proof of education was issued outside of the United States, students must have their documents evaluated for equivalency by a recognized provider such as naces.org, scholaro.com, or wes.org.

Students, upon enrollment, will attest to their fluency in English, including the ability to communicate, write, and read fluently. This is essential for effective communication in the healthcare environment.

Please note, due to the close proximity students will have with patients during the externship portion of the program, we require students at the time of registration to provide proof of Tdap, Hepatitis B, MMR, Varicella, and Meningococcal vaccination. Students may obtain proof of immunization from the Massachusetts Immunization Information System (MIIS) at <https://www.mass.gov/massachusetts-immunization-information-system-miis> or from the office of the physician who performed their most recent physical examination.

Admission Application and Enrollment Agreement Deadline

Prospective students must submit their application for admission by the application deadline, which is five (5) days before the class starts. The application for admission can be accessed on our website at www.PhlebotomyUSA.com. The application will be processed within five business days of submission, and the student will be notified by email. Once the application for admission has been approved, students will begin class registration and fill out their enrollment agreement. Please note, late registration will not be accepted after the day prior to the first day of class.

Postponement of Start Date

Postponement of a starting date requires a written agreement signed by the student and PTS. The agreement must set forth:

- a. Reason for postponement request.

- b. A deadline for the new start date.

Once the new course date has been selected, the student will need to complete a new enrollment agreement upon return. If the program is not commenced or the student fails to attend by the new start date the student will be entitled to a full refund of all fees. All refunds will be processed within 45 days of the new start date deadline, determined in accordance with Massachusetts Refund Law.

Attendance Requirements

Attendance is important for all students, regardless of their current level of knowledge. The entire training program consists of 20 four-hour courses. Due to the program's length, a lack of attendance can affect a student's ability to pass. In order to complete the class and receive a certificate of completion, students must attend at least seventeen (17) out of twenty (20) courses. If students miss more than three (3) courses throughout the program, they will be required to make up the courses they missed in an alternate schedule. If students miss four (4) *consecutive* courses, they will be deemed too far behind the class, and will be automatically removed from the class and required to enroll for another schedule.

Please note that courses PHLB100-1, PHLB100-2, and PHLB100-17 are required to complete the program.

There is a fifteen (15) minute grace period at the start of each class, after which the student will be considered tardy and that time will have to be made up in thirty (30) minute increments. Time will be quantified at the educational facility electronically. If a student misses a portion of class after commencement, they can make it up in an alternate schedule, assuming they comply with completion deadlines. Make up time is available by contacting Student Services at [\(701\) 404-9434](tel:7014049434).

All Externships are 40 hours; they may ONLY be completed in one full 40-hour week, Monday through Friday. Evening, part-time, and weekend externships are NOT available. If the student misses all or part of their scheduled externship for ANY reason, they will be responsible for paying a rescheduling fee that may range from \$100-\$300, depending on the externship site, to be rescheduled in a new externship.

Make-up Time

Students are strongly advised not to miss class unless necessary. If a student misses a portion of the program after the initial 8 hours, the student can make it up at any of the other scheduled programs that are teaching the same course during days, evenings, or weekends. Make-up time is available by contacting student services at 701-404- 9434 or by emailing info@phlebotomyusa.com. It is the student's responsibility to schedule and attend any make-up time. If the missed course cannot be made up during the scheduled month, the student can schedule a make-up time during the next month the course is being taught. There is no fee for make-up classes.

Please call Student Services at 701-404-9434 to reschedule.

Leave of Absence

Due to the short period of time required to complete the program, Phlebotomy Training Specialists will not grant students a Leave of Absence. In the case of a prolonged illness or accident, death in the family, or other special circumstances that make attendance impossible or impractical, the student will be required to withdraw from the program. PTS will process an appropriate refund in accordance with the Massachusetts Refund Law.

Completion Timeline Policy

Completion Timeline for 80-hour In-Class Portion

Students will have 120 days to complete the 80-hour in class portion of the program from the original course start date (decided at the time of registration). Students who do not complete the Didactic Portion within the timeframe will be subject to the terms of Re-enrollment.

Completion Timeline for Externship

Following the completion of the Didactic portion of class, the student will need to login to their account and pick their externship date and location. Students must complete their externship within 90 days from their didactic completion date. If the Externship is not completed within 90 days, students will be required to pay a rescheduling fee of from \$100-\$300; as long as their completion deadline has not expired.

Completion Timeline for Exam - Optional

Upon the completion of the Didactic portion of the program, should they choose to do so, students have 30 days to create an account with the NHA to register for the exam. Students who fail to do so within 30 days will forfeit the \$130 exam fee and must pay the NHA directly. The exam must be completed within 90 days after account creation. No extensions for this policy will be given. Should students choose to forego the NHA exam, they may opt out of it in their student portal and will not be charged the \$130 exam fee.

Completion for Full Program

Students have 9 months to complete the program in its entirety. Students who fail to complete the 80-hour In-Class portion OR the 40-hour Clinical Externship within designated timelines (stated herein) will be required to re-enroll and pay new fees as outlined.

Re-Enrollment Policy

If students fail to meet any of the deadlines described above, they will be required to re-enroll as new students. No payments made or attendance completed will carry over this new enrollment. Students may re-enroll and make payments via the student portal or by contacting Student Services at (701) 404-9434.

Extension Policy

Students may request an extension for their didactic coursework for extenuating circumstances by contacting Student Services at info@phlebotomyusa.com. All requests must be sent in writing. Requests for extensions must be submitted before the Completion Deadline. Extensions will be granted for certain situations such as severe medical issues, the death of relatives, natural disasters, and cases of assault.

Automatic Extensions will be granted for a) PTS rescheduling program dates past the expiration date of this agreement and b) PTS rescheduling program dates past the expiration of the extension period.

All balances must be paid in full before extensions will be granted. Extensions are not to exceed more than 30 days of the original didactic deadline. No more than one extension will be granted per student.

Grading Policy

The phlebotomy training program does not grade using a standard letter scale. The 80 hours of Didactic training is comprised of 20 four-hour courses: 13 Didactic and 7 Practical Lab. Each course is graded as a “pass” or “fail”. To successfully complete the coursework, students must pass at least 70% of the courses and the final practical exam.

Didactic Courses (13 total days): To ensure students learn the necessary theories, principles, terminology, and anatomy to complete the program, the following are the assessment criteria for a “pass” to be issued:

- Class participation
- Instructor Q&As
- Formative group quizzes at the end of each textbook chapter

Practical Lab Courses (7 days): To ensure students develop the practical skills, techniques, and venipuncture proficiency to complete the program, the following are the assessment criteria for a “pass” to be issued:

- Venipuncture, Butterfly, and Capillary Evaluations
- Class participation
- Final practical examination

Final Practical Exam: Students must complete a final practical evaluation during the last hands-on day of the program. The test will include knowledge of tubes, additives, order of draw, and the ability to complete each step in the correct order and without correction. Students will also have to complete 4 successful draws (2 arms and 2 hands) on their own and in front of the instructor.

Students who fail the final practical exam must contact student services to schedule a minimum of two days to complete additional blood draw practice before they can schedule their final practical exam retake.

If a student's performance falls below the cumulative pass rate of 70%, the institution will initiate a conversation with the student to discuss their challenges and explain the student's options for remediation.

Grading System

PHLB100-01	Introduction to Phlebotomy	Pass / Fail
PHLB100-02	Venipuncture Steps	Pass / Fail
PHLB100-03	Lab Skills Development – First Blood Draws	Pass / Fail
PHLB100-04	The Healthcare Setting	Pass / Fail
PHLB100-05	Capillary Punctures	Pass / Fail
PHLB100-06	Lab Skills Development – Butterfly Needles	Pass / Fail
PHLB100-07	Safety	Pass / Fail
PHLB100-08	Medical Terminology	Pass / Fail
PHLB100-09	Lab Skills Development – Centrifuge, Dermal Sticks, Hands-On Practice	Pass / Fail
PHLB100-10	Body Systems	Pass / Fail
PHLB100-11	Lab Skills Development – Order of the Draw Practice	Pass / Fail
PHLB100-12	The Blood	Pass / Fail
PHLB100-13	Lab Skills Development – Hands on Practice/Activities	Pass / Fail
PHLB100-14	Special Collections	Pass / Fail
PHLB100-15	Friends & Family	Pass / Fail
PHLB100-16	Specimen Collections	Pass / Fail
PHLB100-17	Practical Exam	Pass / Fail
PHLB100-18	Other Specimens	Pass / Fail
PHLB100-19	Career Development	Pass / Fail
PHLB100-20	GCP & Shipping	Pass / Fail

Graduation and Certificate of Completion Requirements

Certificates of Completion will ONLY be awarded to students who have accomplished the following:

- Passing of the Didactic Courses
- Passing of the Practical Courses
- Passing Scores in Final Practical Exam.
- Performed and logged a successful minimum thirty (30) live venipunctures and ten (10) live capillary sticks
- Completed Student File / Paperwork
- No outstanding payment obligations
- Completed the 40-hour Clinical Externship

We do not mail original copies of the Certificate of Completion. If the student would like one sent to them, they can have one printed and mailed directly from our Corporate Offices for a fee of \$20.00. Please log on to the student portal to request and pay for the printed and mailed Certificate. If the student notices any mistakes on their Certificate, please email documents@phlebotomyusa.com.

Career Advisory Services

Phlebotomy Training Specialists **do not** provide any formal placement into employment opportunities. **Placement in a job is not guaranteed or promised to persons who complete the program.** To that end, we do not leave the students on their own to find employment.

We do the following for students:

Market Sectors – We provide each student with a list of local economic sectors that consistently employ phlebotomy technicians. This list of local sectors may include Plasma Centers, Blood Banks, Platelet Donation, Dialysis, Physicians' Offices, Medical Clinics, Laboratories, Hospitals, and Paramedical Examinations, to name a few. We do not provide student referrals to prospective employers, and we do not have direct contact with employers regarding current job openings.

Resume Writing – All students are encouraged to send their resumes to our on-staff employment specialist(s) at careers@intelvio.com. The specialist(s) can assist the students with fine-tuning their resume(s) through suggestion(s), possible rewrites, and overall resume etiquette.

Student Performance, Remediation, and Academic Dismissal Policy

Student Performance

The Phlebotomy Training program is a fast-paced, often stressful, learning environment that demands a high level of dedication and proficiency. Students are expected to meet all program requirements, including classroom attendance, participation, and the ability to demonstrate proficiency in blood draws.

If a student's performance falls below the expected standards, the institution will initiate a conversation with the student to discuss their challenges and provide guidance on improving their performance.

Remediation

Remedial training is provided if it is found that a student is not progressing. Students are allowed to attend additional weekend/evening/day courses free of charge for additional training. They may continue attending month after month if they feel they need additional training. Students must achieve a cumulative passing rate of 70% of the courses to move out of remediation and stay on track for graduation.

Dismissal

If, after reasonable efforts to support the student's success, the student continues to fail to meet the program's requirements and remediation required, the institution may be required to dismiss the student from the Phlebotomy Program. Dismissal will be a last resort and will only occur after due consideration of the student's circumstances.

Records

Student records including student academic, financial, and certificates are maintained digitally indefinitely and can be accessed at PTS; transcripts are kept permanently. Students have a right to access their records anytime. A student can access records by logging on to their student portal, students.phlebotomyusa.com.

Only the student, PTS administration, and the Commonwealth of Massachusetts' Division of Private Occupational Licensure have access to review student records.

If a student would like a copy of their transcripts, please email a written request to info@phlebotomyusa.com. There is no fee for a copy of their transcript.

Dress Code

Classroom

Students are expected to arrive well-groomed and dressed appropriately for class. Students should avoid wearing Low-cut tops, crop tops, sheer clothing, miniskirts, or excessively tight attire to class. While scrubs are not required, they are recommended. Casual attire is acceptable, but closed-toed shoes are mandatory—sandals and open-toed shoes are not permitted. Students may wear acrylic nails in class, but be mindful that they are a conservative in design and length, as they may tear your gloves.

Externship

Students participating in a clinical externship will be required to wear medical scrubs. Any specification to color or brand will be at the externship site's discretion. The student must remove potentially offensive jewelry, have clean short fingernails, cover any visible tattoos, and smell clean and free of body odor.

Mental State

Students at the time they sign their enrollment agreements acknowledges they must show up to class lucid, mentally and physically rested and prepared. If the instructor feels a student is not prepared, they will be questioned and, if necessary, dismissed from that session with the instruction to be prepared for the next session.

Students who are under the influence of alcohol, illicit drugs, prescription drugs, medical marijuana, recreational marijuana, or any other mind or body-altering substances cannot participate in class per the Conduct & Dismissal Policy.

Cleanliness and Sanitation Protocols

Maintaining strict cleanliness and sanitation protocols within the practice space is essential to ensuring patient safety, preventing infections, and upholding professional standards.

General Cleanliness and Sanitation Procol

Students must wear closed-toe shoes, scrubs, and appropriate personal protective equipment (PPE). Proper hand hygiene is mandatory before and after each procedure, and food or drinks are not allowed in the lab area.

Equipment and Workstation Protocol

Workstations must be properly set up with only necessary supplies, ensuring all materials remain sterile. Used needles and lancets must be disposed of immediately in designated sharps containers. Any spills or contamination must be reported and cleaned immediately. Gloves must be worn during procedures and changed afterward, and all blood draws must be conducted using a chux pad for cleanliness.

Safety Policy

To ensure a safe and professional learning environment, students must adhere to the following regulations when performing blood draws in the clinical area of the classroom.

General Safety Rules

All blood draws must be performed under instructor supervision using only approved techniques. Self-drawing or unauthorized procedures are strictly prohibited.

Conduct During Blood Draws

Students are expected to remain professional, focused, and communicative. They must obtain verbal consent before performing a blood draw and follow best practices for venipuncture. If unsuccessful after two attempts, they must stop and seek instructor assistance. Any adverse reactions, such as dizziness or fainting, must be reported immediately.

Friends & Family Days

Visitors participating in blood draws must sign a liability waiver and follow all safety protocols. Procedures involving guests must be conducted under direct instructor supervision, ensuring compliance with hygiene and post-draw care guidelines.

Incident Reporting

All needlestick injuries, exposure incidents, or equipment malfunctions must be reported immediately. Students must sign all required safety agreements before participating in clinical activities. Failure to comply with safety regulations may result in verbal or written warnings, suspension from clinical activities, or disciplinary action for severe violations. Unsafe behavior, such as improper needle disposal or unsupervised procedures, will result in immediate consequences.

By following these regulations, students contribute to a safe and effective learning environment while developing essential skills for professional practice.

Conduct & Dismissal Policy

Phlebotomy Training Specialists reserve the right to enact disciplinary procedures (outlined below). If a student is dismissed from the training program, the Massachusetts Refund Law will be in effect based on the student's last date of attendance. The last session of attendance may be the date of dismissal. Students are expected to maintain professional conduct within the classroom. The following is a list of enumerating behaviors that are unacceptable in the classroom setting. These examples of impermissible behavior described below are not intended to be an all-inclusive list. Phlebotomy Training Specialists Director has full discretion, and any violation of the policies or conduct considered inappropriate or unsatisfactory may be subject to disciplinary action, up to and including dismissal from the program.

1. **Language / Interpersonal Conduct**
 - a. Fighting (verbal, physical, electronic) with or assaulting another individual
 - b. Threatening or intimidating any other individual by any method (verbal, written, electronic, etc.)
 - c. Engaging in any form of harassment (sexual, emotional, etc.)
 - d. Using vulgar language, explicit terms, or profanities
 - e. Discussing sensitive topics such as religion, sexual orientation, gender, racial issues, political affiliation, etc.
2. **Conduct**
 - a. Use of cell phone for non-emergencies while in class, lab, and/or externship
 - b. Continually speaking out of turn or disrupting the flow of class with off-topic discussions
 - c. Arriving late to class or leaving early more than twice without prior notification per the attendance requirements.
3. **Safety**
 - a. Failing to abide by lab safety rules and policies
 - b. Refusing to follow the instructor's directions or being insubordinate
 - c. Failure to adhere to corrections or guidance given by the instructor
 - d. Continued disregard for cleanliness and sanitation protocols
4. **Mental/Physical State**
 - a. Showing up to class in improper attire, wearing inappropriate shoes, or generally unkempt.
 - b. Attending class while under the influence of alcohol, illicit drugs, or any other mind/body-altering substance. (This includes prescription and recreational drugs).
5. **Student Eligibility, Accommodations, & Performance**
 - a. Failure to meet the performance requirements
 - b. Inability to benefit as reviewed by instructional staff, regional, and national directors who've helped develop and update the program's curriculum.
6. **Automatic Dismissal**
 - a. Possessing firearms or any other weapons in the classroom
 - b. Illegal Activity of any kind
 - c. Using, selling, dispensing, or possessing alcohol, illegal drugs, or narcotics on-premises. Recreational drugs are also not permitted on-premises.
 - d. Falsifying Documentation or signatures
 - e. Theft of classroom supplies, faculty or student personal items
 - f. Being absent for any part of the first 8 hours of the program

Dismissal Procedures:

Upon infraction of one of the above prohibitions, a Phlebotomy Training Specialists staff member will issue the student a verbal and written warning to the student. This is to be considered a corrective plan of action. If the prohibited action and/or behavior continues, Phlebotomy Training Specialists will dismiss the infracting student(s) from the program. Any student who has violated the prohibitions outlined in section 6, the “Automatic Dismissal” section, will be subject to automatic dismissal with no exception(s).

All dismissal procedures will be determined by at least three Phlebotomy Training Specialists management team members, including a consultation with the issuing staff member. Any student who wishes to appeal Phlebotomy Training Specialists’ final decision shall do so in writing. Any dismissed student may attain reentry into the program(s) by contacting PTS’ Student Services Director, Heidi Samani, and meeting with her individually to discuss our expected classroom etiquette with her on an individual basis.

Warnings & Suspension

Students will be given written warnings when it comes to their conduct in class. If they are disruptive, harass, or discriminate against another student or instructor, they will be written up by their instructor.

Three times being written up will result in suspension from the program. If the student chooses to entirely withdraw from the program AFTER their initial suspension, the student’s tuition will be refunded based on their last day of attendance and will follow the Massachusetts Refund Law contained herein.

When suspended from a program, a student may not re-enter the class in which they were enrolled until the start of the next month. They can, however, attend any other course schedule, such as the evening or weekend schedules, if they were in the day schedule. If they wish to re-enter at the same course schedule as they were originally enrolled, they must wait until the start of the next cohort, according to the course calendar.

Re-entry / Readmission

Upon infraction of one of the above expectations, a Phlebotomy Training Specialists staff member will issue a verbal and written warning to the student. This is to be considered a corrective plan of action. Students get three warnings, and on the fourth incident, they are suspended from the program, as stated previously. Students who want to gain re-entry into the program after suspension will have to submit a request to the PTS corporate offices. PTS Corporate offices will take 48 hours to determine eligibility. This may result in a call to the student to discuss the issues at hand. A suspended student may only gain re-entry into the program once. If the impermissible behavior continues, Phlebotomy Training Specialists will dismiss students from the program. Students who have violated policies outlined in the “Automatic Dismissal” section will be subject to automatic dismissal.

Student Rights

Phlebotomy Training Specialists affords its students the following rights:

- Access to instructors and management for any assistance
- Fair and impartial treatment
- Providing Privacy to Student Records

Student Probation

Phlebotomy Training Specialists do not place students on probation.

Facilities and Equipment

Our school is located at 196 Boston Ave, Suite 2500, Medford, MA 02155

Students will receive hands-on training on modern medical equipment and informative lectures. Large whiteboards, televisions, diagrams, and videos will be provided to enhance classroom activities and didactic learning. The classroom is well-lit, air-conditioned, heated, ventilated, and appropriate for an educational site. Parking is sufficient and conveniently located nearby. Phlebotomy Training Specialists do not provide housing or transportation.

The facility and equipment used fully comply with all federal, state, and local ordinances and regulations, including the requirements for fire and building safety.

Student Guidance and Counseling

Students seeking counseling, career advice, or academic support can contact Student Services Director Heidi Samani at h.samani@phlebotomyusa.com. If Ms. Samani is unavailable, students can speak with a Student Services representative Monday through Saturday during business hours. They can either email them at info@phlebotomyusa.com or call toll-free at 701-404-9434. For curriculum assistance, students can schedule an appointment with the student resource instructor, Ms. Ericha Dick, at ericha@phlebotomyusa.com

Learning Resource Information

Phlebotomy Training Specialists uses a training system in which they provide students with all the resources they need to complete the program and attain the knowledge to prepare for and pass the national exam, should the decide to take it. This is similar, if not identical, to how most Phlebotomy programs operate.

Our system, coupled with our practiced exams and quizzes, has proven to be sufficient for students to succeed in their Phlebotomy Training.

To further enhance our students' success, we have compiled a learning resource library that students can refer to using information directly from the source. This library is available to all current and/or graduated students to keep current as the source material is updated.

The learning resource library is available from the student account and can be accessed anytime, anywhere. Better yet, it does not require multiple people to handle the learning resource like a hard copy book library, which requires decontamination between readers.

With the resources available in electronic format, the same resource is available to all students, and no one is left waiting for a return or waiting until the next classroom visits to access it.

Externship Completion

Students who have completed the program's Didactic & Lab Skills portion will be ready to move to the externship portion of the program. A background check will be completed on all students before being placed in an externship location. Students will not receive compensation for clinical or externship experience.

Students are required to complete a 40-hour externship. Externships are offered Monday through Friday, 8:00 a.m. to 5:00 p.m. or 9:00 a.m. to 6:00 p.m., and are scheduled for ONE consecutive workweek. Evening and weekend externships are unavailable, so students must make arrangements to take vacation time or a leave of absence from their jobs when their externship is scheduled to begin. All school policies remain in effect while students are in the field for externships. These hours are tracked on a timesheet approved by the site supervisor.

Externship Patients' Care and Rights Policy

Students participating in a clinical externship are subject to the policies and guidelines established by the externship facility, including those related to patient care and rights. Any violation of these policies may result in disciplinary action, including termination of the student's externship.

National Exam Information - Optional

Upon successful completion of the program—which includes performing a minimum of thirty (30) live venipunctures, ten (10) live capillary sticks, fulfilling payment obligations, and submitting all required documentation, including a blood draw log, and completion of the 40-hour clinical externship—PTS students are eligible to sit for certification national examination from the National Healthcareer Association (NHA).

Students who opt to take the NHA National Exam will receive instructions via email on how to proceed with the exam, including guidance on creating an NHA account. The NHA provides a comprehensive test plan on its website at <https://certportal-store.nhanow.com/category/cpt2/>.

Upon successful completion, this examination results in a National Certification, which needs to be renewed every two years. Renewal information can be found at <https://www.nhanow.com/stay-certified>.

Student for Life Policy

All students, after they complete the Phlebotomy Training program in its entirety may revisit any course they've previously completed, free of charge, to keep their skills sharp. Graduates wanting to revisit course must first contact Student Services for scheduling.

Previous Credits

Phlebotomy Training Specialists does not grant credit to students for other programs taken in the field of Phlebotomy, Nursing Assistant Training, or any other field. This program is a stand-alone program, and no reduced tuition, nor will reduced hours of participation be given.

Transfer of Credits

Phlebotomy Training Specialists does not guarantee the transferability of its credits to any other institution unless there is a written agreement with another institution.

The transferability of credit and credentials earned is at the sole discretion of the receiving school. Acceptance of the certificate students earn in Phlebotomy is also at the complete discretion of the institution to which they may transfer. If the certificate is not accepted at the institution to which students may transfer, they may be required to repeat some or all of their coursework at that institution. For this reason, students should make certain that the program with Phlebotomy Training Specialists will meet their educational goals.

Student Grievance Procedure

Should a student have a complaint with Phlebotomy Training Specialists, the following steps will be taken. Students will not be subject to unfair actions due to filing a complaint.

1. The student shall first attempt to address the grievance informally with the instructor or applicable staff member and try to resolve it. If unsuccessful, proceed to the written grievance procedure.
2. Students may state their grievance in writing and send it to the Student Services Director. Please submit the written request within **60 days** of the occurrence to the Student Services Director, Heidi Samani, at h.samani@phlebotomyusa.com or by phone at 801-669-2056; she will assist the student in resolving their concerns. Following 230 CMR 15.07(2) Ms. Samani (representing PTS) shall respond to written student complaints in writing within ten days from when the complaint was submitted to PTS. She will also try contacting the student via email or phone to schedule a meeting. In the meeting, Ms. Samani will discuss the complaint, allow the student to be heard, and discuss an amicable resolution to the complaint. Written notification of the resolution will be sent via email to the student within 10 days after the student meeting.
3. In her absence, you can contact info@phlebotomyusa.com or **701-404-9434**. A representative will pass on the complaint to Ms. Samani. She will contact the student within 10 days of receiving the complaint via email or phone to schedule a meeting. In the meeting, they will discuss the complaint, allow the student to be heard, and discuss an amicable resolution to the complaint. She will consult with PTS's COO, and written notification via email of the resolution will be sent to the student within 10 days of the meeting.

Students may contact the Commonwealth's Division of Private Occupational Licensure's Office of Private Occupational School Education, at any time via email at occupational.schools@mass.gov or by phone at 617-701-8719.

Withdrawal from Program

Phlebotomy Training Specialists asks all requests from students to withdraw from their program be submitted in writing to payments@phlebotomyusa.com.

Upon a student's withdrawal from a program, Phlebotomy Training Specialists shall:

- a. treat the withdrawal as a termination of the enrollment agreement, effective immediately;
- b. complete a refund calculation for the student, including all fees and payments; and
- c. provide the calculation and any refunds within 45 days of the effective date of the termination

A student will be determined to be withdrawn from the institution if the student has not attended three consecutive classes without any prior authorization. In response, Phlebotomy Training Specialists shall:

- a. for purposes of any payments due from the student or refund due to the student, treat the student's nonattendance as a termination of the enrollment contract, effective no later than the last date of attendance or last participation in an instructional activity;
- b. determine the effective date of the termination within 30 days after the end of the period of enrollment or the program, whichever is earliest
- c. complete a refund calculation for the student, including all fees and payments in a form acceptable to the division; and
- d. provide the calculation and any refund to the student within 45 days from the date PTS determines the effective date of termination.

Refund Law (As per M.G.L. Chapter 255, Section 13K):		Dates
1.	You may terminate this agreement at any time.	N/A
2.	If you terminate this agreement within five days you will receive a refund of all monies paid, provided that you have not commenced the program. Refund Amount \$1465.00	5th day after date both parties have signed the contract
3.	If you subsequently terminate this agreement prior to the commencement of the program, you will receive a refund of all monies paid, less the actual reasonable administrative costs described in paragraph 7. Refund Amount \$1415.00	Program start date
4.	If you terminate this agreement during the first quarter of the program, you will receive a refund of at least seventy-five percent of the tuition, less the actual reasonable administrative costs described in paragraph 7. Refund Amount \$801.25	Completion of 30 hours of content
5.	If you terminate this agreement during the second quarter of the program, you will receive a refund of at least fifty per cent of the tuition, less the actual reasonable administrative costs described in paragraph 7. Refund Amount \$517.50	Completion of 60 hours of content

6.	If you terminate this agreement during the third quarter of the program, you will receive a refund of at least twenty-five percent of the tuition, less the actual reasonable administrative costs described in paragraph 7. Refund Amount \$233.75	<i>Completion of 90 hours of content</i>
7.	If you terminate this agreement after the initial five day period, you will be responsible for actual reasonable administrative costs incurred by the school to enroll you and to process your application, which administrative costs shall not exceed fifty dollars or five percent of the contract price, whichever is less. A list of such administrative costs is attached hereto and made a part of this agreement.	<i>5th day after date both parties have signed</i>
8.	If you wish to terminate this agreement, you must inform the school in writing of your termination, which will become effective on the day, such writing is mailed.	<i>N/A</i>
9.	The school is not obligated to provide any refund if you terminate this agreement during the fourth quarter of the program.	<i>Completion of over 90 hours of content</i>

Administrative Costs Equal: \$ 50.00

The calculations above are based on full tuition being paid. If a student is not paid in full, the amount refunded will be proportional to tuition paid and classes attended. Refunds will only be issued to the original card used in the transaction. If the card is no longer active, we can send a check, which will require a 3% processing fee and can only be issued to the original cardholder.

Students have the right to cancel their enrollment before the completion of five school days or five percent of this Program, or course, whichever occurs first, and to receive a full refund of all monies paid, less actual reasonable administrative costs up to \$50 and actual reasonable costs of non-reusable supplies or equipment.

Supplies and Equipment: \$150 – Part of the fee is used to maintain classroom stock of standard supplies for venipuncture such as needles, collection tubes, needle holders, aliquot tubes, pipettes, and microscope slides and will also be used to maintain classroom stock of basic medical supplies necessary for safe blood collection such as gauze, medical tape, alcohol pads, and nitrile gloves. This fee is refundable on a pro rata basis according to the practical lab courses.

Workbook: \$45 – Once workbooks are issued and received by students, no refund will be issued.

E-book: \$35 – Once students access the e-book, no refund will be issued. Access to the e-book is valid for twelve months.

A student will be determined to be withdrawn from the institution if the student has not attended three consecutive courses. The student will receive a refund based on their last day of attendance. The refund will be issued after 45 days based on the last day of attendance. A student choosing to withdraw from the program must provide written notice to Phlebotomy Training Specialists by emailing payments@phlebotomyusa.com.

Student Eligibility, Accommodations, and Performance Policy

Phlebotomy Training Specialists is committed to providing equal educational opportunities to all students, including those with disabilities, in compliance with the Americans with Disabilities Act (ADA). This policy outlines our commitment to inclusivity while maintaining the necessary standards for students participating in the Phlebotomy Program. PTS does not discriminate on the basis of disability and is committed to providing reasonable accommodations to qualified students with disabilities to ensure equal access to educational programs and activities.

Accommodations

Phlebotomy Training Specialists is committed to providing reasonable accommodations to students with disabilities to facilitate their participation in the Phlebotomy Training Program. Accommodations will be determined on a case-by-case basis in consultation with the student and the institution's Student Services.

Chaperones

Chaperones or personal assistants are not allowed in the classroom to assist students during the program. All students are expected to participate independently and demonstrate proficiency.

Assessment and Reasonable Modification

Students' abilities to successfully participate in the Phlebotomy Training Program will be assessed based on their performance in the classroom and, if applicable, the clinical settings. This includes their ability to perform blood draws safely and effectively. PTS may consider reasonable modifications to accommodate students with disabilities, provided that such modifications do not fundamentally alter the essential requirements of the Phlebotomy Program or compromise patient safety.

2025 PHLB100 PHLEBOTOMY TRAINING SYLLABUS

A. PROGRAM DESCRIPTION:

The Phlebotomy Training program is designed to train individuals to properly collect and process blood and other clinical specimens for laboratory testing and to interact with healthcare personnel, clients, and the general public. The presentation includes equipment, additives, basic anatomy, and safe and effective venipuncture techniques. Emphasis will be placed on collection techniques, specimen processing, workflow practices, referrals, and utilizing laboratory information systems.

Our average faculty-to-student ratio is 1:16. Our maximum class capacity is 20, so during those times, the ratio is 1:20.

B. METHOD OF INSTRUCTION:

The student is trained through the courses during program, obtaining that knowledge through books and hands-on training each course.

The book knowledge obtained is then applied in the hands-on training portion of the program. The theory is taught first, and the actual application of the theory follows shortly thereafter.

After students complete the initial 80 hours of the program, they will complete a 40-hour clinical externship where they will gain hands-on experience in a real-world setting while learning from experienced professionals.

C. EXPECTATIONS/COMPETENCIES/OBJECTIVES:

Upon completion of the Phlebotomy Training program, students will have an opportunity to learn how to:

- a. Demonstrate knowledge, entry-level skills, and tasks associated with blood collecting and other specimen collection processes.
- b. Assist the health care team in the accurate, safe, and reliable collection and transportation of specimens for clinical laboratory analyses.
- c. Apply knowledge to basic and special laboratory procedures.
- d. Demonstrate proper infection control techniques used in specimen collection.
- e. Select appropriate equipment, methods, and reagents for the collection of laboratory specimens.
- f. Prepare patients and equipment for the collection of laboratory specimens.
- g. Apply ethical, legal, and regulatory issues to the collection of laboratory specimens.
- h. Evaluate quality control procedures and possible sources of error or inconsistencies in specimen collection.
- i. Work cooperatively with staff members, patients, and community resource people.
- j. Apply knowledge to create and maintain a safe working environment.
- k. Respect patient confidentiality and maintain professional conduct in a culturally diverse environment.

Course Breakdown

<u>Course Number</u>	<u>Course Title</u>	<u>Lecture Hours</u>	<u>Lab Hours</u>	<u>Total Hours</u>
PHLB100-01	Introduction to Phlebotomy	4	0	4
PHLB100-02	Venipuncture Steps	4	0	4
PHLB100-03	Lab Skills Development – First Blood Draws	0	4	4
PHLB100-04	The Healthcare Setting	4	0	4
PHLB100-05	Capillary Punctures	4	0	4
PHLB100-06	Lab Skills Development – Butterfly Needles	0	4	4
PHLB100-07	Safety	4	0	4
PHLB100-08	Medical Terminology	4	0	4
PHLB100-09	Lab Skills Development – Centrifuge, Dermal Sticks, Hands-On Practice	0	4	4

PHLB100-10	Body Systems	4	0	4
PHLB100-11	Lab Skills Development – Order of the Draw Practice	0	4	4
PHLB100-12	The Blood	4	0	4
PHLB100-13	Lab Skills Development – Hands on Practice/Activities	0	4	4
PHLB100-14	Special Collections	4	0	4
PHLB100-15	Friends & Family	0	4	4
PHLB100-16	Specimen Collections	4	0	4
PHLB100-17	Practical Exam	0	4	4
PHLB100-18	Other Specimens	4	0	4
PHLB100-19	Career Development	4	0	4
PHLB100-20	GCP & Shipping	4	0	4
Total Hours		52	28	80

Procedures List:

Proper Handwashing Technique; Gowning, Masking, and Gloving; Removal of Isolation Gown, Mask, and Gloves; Disposing of Contaminated Items; Gloving Technique; The Basics of Patient Identification; Use of a Tourniquet; Performing a Venipuncture; Skin Puncture Using a Retractable Device; Heel stick Procedure; Dorsal Hand Vein Procedure; Surgicutt Bleeding Time Test; Syringe Blood Culture Collection; Safety Butterfly Assemble Blood Culture collection; Obtaining a Blood Specimen for Glucose Testing; Collecting a 24-Hour Urine Specimen; Proper Specimen Handling.

Textbook

Phlebotomy Textbook
Phlebotomy Essentials, Eighth Edition by Ruth E. McCall 2024
ISBN: 978-1284263480

Holder in Due Course Statement

Any holder of this consumer credit contract is subject to all claims and defenses which the debtor could assert against the seller of goods or services obtained pursuant hereto or with the proceeds, hereof Recovery hereunder by the debtor shall not exceed amounts paid by the debtor. (FTC Rule effective 5-14-76).

Accreditation Status

Intelvio, LLC, d/b/a Phlebotomy Training Specialists, does not hold regional, national, or programmatic accreditation from a U.S. Department of Education-approved accreditor and does not participate in federal or state student aid programs.

PTS students are eligible to sit for certification examinations from the relevant phlebotomy training oversight organizations (National Healthcareer Association (NHA)).