

## Compliance Guide for Clinical & Field Students Licensed Professional Counselor

### Compliance Questions? – Contact OCPC anytime!



**Bambi Mroz, MA**  
*Clinical Placement Compliance Specialist*  
[ocpc.compliance@uconn.edu](mailto:ocpc.compliance@uconn.edu)  
Questions about ADB/Complo, requirements, documents, deadlines, etc.



**Jean McCarthy**  
*Director & Clinical/Field Placement Case Manager*  
[clinicalcasemanager@uconn.edu](mailto:clinicalcasemanager@uconn.edu)  
Questions about flags or potential flags on background checks and drug screens

### Introduction

Compliance requirements are designed to keep everyone safe in a clinical or field setting—patients or clients, visitors, providers, technicians, and student trainees. They can include things like immunizations and screenings, background checks, required trainings, forms and attestations, and more. Requirements may come from UConn policies, clinical site policies, and/or clinical affiliation agreements between UConn and clinical sites. These requirements can change during your time in the program, and they apply to every student in a clinical or field placement, regardless of discipline. Compliance ensures your personal health and safety, promotes public health, and allows you to proceed with your clinical or field placement on schedule. Fulfilling these requirements is your responsibility as are any associated costs.

**Reminder: You will not be able to begin your placement if compliance requirements are not met and you will be removed from your placement if compliance lapses.**

### First Steps

1. Review the information in this guide and the full Compliance Overview Training video playlist for your program at <http://ocpc.office.uconn.edu/LPC>.
2. Review all requirements and ask any questions you may have. Mark your calendar with deadlines and make a plan to fulfill all requirements by your program's deadlines.
3. Set up your ADB/Complo subscription (instructions below) and begin working on requirements.
4. Make any necessary healthcare provider appointments as soon as possible.

### Setting Up Your ADB/Complo Account



Complo by American DataBank is the online platform used by all UConn clinical and field placement programs for criminal background checks, drug screens, and compliance requirement tracking. It's your one-stop site to check compliance in all areas, complete some requirements, and receive reminders and expirations. You'll retain access to your documents even after graduation.

To get started, follow these steps:

1. Visit <http://adb.uconn.edu> and log in with your UConn NetID and password. Please do not register using other credentials as you will not be within the UConn environment. If you have any sign-in issues, please let OCPC know right away.
2. Click "Get Started" to begin setting up your ADB/Complo profile with your basic information.
3. Add any aliases that may appear on your documents to ease the review process.

After saving your profile details, you'll be taken to your ADB/Complo home screen where you can place your order, check your overall compliance status, access individual requirements, share your profile, view video tutorials, and much more!

## Purchasing Your Initial ADB/Complo Tracking Package

**WHEN:** *Winter/Spring prior to program start*

Once you've set up your ADB/Complo profile, you're ready to place your order! Follow these steps to ensure that you select the appropriate options for your program:

1. Click "Place Order," select "Licensed Professional Counselor" as your program.
2. Click "Load Packages."
3. Unless otherwise instructed, locate "University of Connecticut Tracking Package" under the Immunization Package(s) heading and select the desired length of your tracking package subscription. Note that you are required to maintain an active ADB/Complo subscription through the remainder of your program.
4. Complete remaining order and account set-up steps as required. Now you're ready to start working on your compliance requirements and uploading your documents (more on that below)!

## Purchasing Your Background Check & Drug Screen Bundle

**WHEN:** *May 1-15 before clinical start (wait for announcement email with instructions!)*

1. Do not order until instructed or you will have to purchase another package!
2. When instructed in July, you'll repeat the order process to order the "LPC Screening Bundle," which includes the basic background check (base price \$28.40, actual cost varies based on the states in which you have lived), FACIS Level 3 background check (\$7.00), and 12-panel drug screen (\$59.00).
3. If you have lived internationally for 90+ consecutive days in the past 7 years, you must also purchase an International Background Check as a separate item (base price \$20.00, actual cost varies based on the countries in which you lived).
4. For background check purposes, make sure the primary name on your ADB/Complo account exactly matches the name on your social security card. For drug screen orders, the name on your order should match your government-issued photo ID. You can find more specific details and tips about the background check and drug screen later in this guide.
5. If you have questions or concerns about a flag or potential flag on your background check or drug screen, please reach out immediately to [clinicalcasemanager@uconn.edu](mailto:clinicalcasemanager@uconn.edu).
6. You will repeat your background check and drug screen each year in the program, but please wait to order until instructed so you don't have to purchase a duplicate package!

## What happens next?

Once you place your **Tracking Package order**, you can begin working on your compliance requirements and submitting your documents for review. **Remember that you are responsible for collecting and uploading all required documentation so that it can be verified by ADB/Complo staff** (e.g., forms, immunization records, lab reports, insurance card, CPR certification, and more). You will not be allowed to participate in clinical rotations if you are not compliant in all categories. Please plan ahead and be proactive in seeking healthcare provider appointments and documentation to meet your compliance requirements.

**For Background Check orders**, you don't need to do anything more once you've placed your order and supplied all required information. ADB/Complo will complete your background check within a few days and port the results into your compliance profile. **For Drug Screen orders**, you will need to complete your screening within the two-week window at the location you selected. Once you've completed the screening at the testing site, you don't need to do anything more as ADB/Complo will automatically receive the result and port it into your compliance profile. For both background checks and drug screens, be sure to check your UConn email frequently because you will be notified of any flags, and it is your responsibility to reach out to [clinicalcasemanager@uconn.edu](mailto:clinicalcasemanager@uconn.edu) as quickly as possible to begin the resolution process. More information about the background check and drug screen can be found later in this guide.

## Compliance Requirements Checklist & Due Dates

See later pages of this guide for important details about each requirement.

*\*denotes requirements that expire and will need to be kept current during your program*

### Due by May 1

- ☐ Immunization Requirements
  - ☐ Measles, Mumps & Rubella (MMR) – positive quantitative IgG titers
  - ☐ Varicella – positive quantitative IgG titer
  - ☐ Hepatitis B – positive quantitative HbsAb titer
  - ☐ Tetanus\* – current Tdap vaccination within 10 years
  - ☐ COVID-19 Vaccine
- ☐ Tuberculosis\* – QuantiFERON blood test or two-step Mantoux PPD skin test
- ☐ Other Requirements
  - ☐ Physical Exam\* – use UConn form available at <http://ocpc.office.uconn.edu/Physical>
  - ☐ CPR Certification\* – American Heart Association Basic Life Support (BLS) Certification required
  - ☐ Student Consent & Attestation – complete within ADB/Complio
  - ☐ Health Insurance Card
  - ☐ HIPAA Training\*
  - ☐ OSHA Training\*

### Due May 1-15 – please wait for instructions before ordering

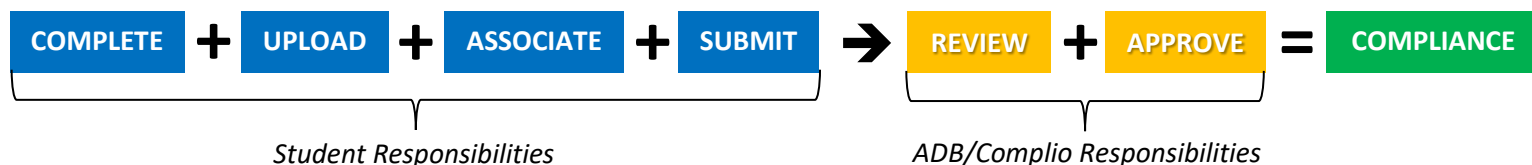
- ☐ Basic Criminal Background Check\*
- ☐ FACIS 3 Background Check\*
- ☐ 12-panel Drug Screen\*

### Due by October 1 (if placement continues)

- ☐ Seasonal Influenza Vaccine\*

## Pathway to Compliance

Remember: It isn't enough to complete the above requirements...you must also upload appropriate documentation into ADB/Complio and associate the document(s) to the correct requirement so they can be reviewed!



## Key Symbols You'll See in ADB/Complio



### Not Compliant

This could mean that you haven't yet submitted anything for the category, that you have additional steps before you can achieve compliance for this category, and/or that one or more submitted documents were rejected.



### Under Review

One or more documents you've submitted are in the ADB/Complio review queue.



### Compliant

Congratulations! Be sure to pay attention to any expiration dates so you can keep your compliance status.

### Gathering Documents

As you complete requirements, you'll need to make sure you're gathering the appropriate documents for submission to ADB/Complo. You might obtain these documents from your healthcare provider, a patient portal, your Student Health & Wellness portal, or other sources. Please be aware that not all standard reports will contain all required information for compliance so make sure to double check before you submit your documents to ADB/Complo. Be proactive and advocate for yourself throughout this process—remember that you are ultimately responsible for your own compliance!

### What's required on your documents?

In general, all submitted documents must include your full name (must match at least one name in your ADB/Complo profile), the date the service was performed, and the provider name/details. For titers, your lab report should include the quantitative result and interpretive reference ranges. Additionally, make sure your documents are clear and legible. You can scan to JPG or PDF, download/print to PDF, or even take photos with your smartphone. Just be sure to make your documents as professional as possible—sometimes we have to provide your actual documents to a site, so don't submit something you'd be embarrassed to use professionally! We recommend that you name your files so that you'll know which document goes with which requirement (e.g., "MeaslesTiter.jpg" vs. a default "IMG8675309.jpg").

### Uploading Documents & Associating with Requirements

When you've gathered some documents and you're ready to submit them to ADB/Complo, simply follow these steps:

1. Log into your account at <http://adb.uconn.edu>
2. Use your ADB/Complo home screen to find the category you want to work on and click "Enter Requirement"
3. If you're completing a form within ADB/Complo, follow the prompts to review and sign electronically
4. Otherwise, select the individual component requirement from the dropdown (e.g., Measles Titer)
5. Enter pertinent details (date, titer result, expiration, etc.) as applicable
6. Upload file or select from previously uploaded files
7. Click "Submit"
8. Repeat for each requirement in the category or for other categories as desired

Remember that you can attach multiple documents to the same requirement and/or attach the same document to multiple requirements. Once submitted, your documents will go into the ADB/Complo review queue, which typically takes 2-3 business days. Watch your UConn email during this time as you will receive a notification if your submission was rejected. The ADB/Complo admin will include comments with the reason for the rejection so you can address the issues. If you have any questions, please reach out to OCPC for assistance.

### General Notes on Immunization Requirements

For some immunization requirements (MMR, Varicella, and Hepatitis B), documentation of prior vaccination is not sufficient for compliance. Instead, you must demonstrate immunity through a positive titer, a blood test that checks for the antibodies produced by the vaccines. Titer results may be positive (indicating immunity), negative (indicating a lack of immunity), or equivocal (indicating a lack of immunity). Any negative or equivocal results will require boosters and repeat titers, so please plan ahead for possible wait times between steps.

For immunizations that require titers, your healthcare provider will order the labwork for you and then you will go to the designated lab site to have your blood drawn. After the sample has been processed, you should obtain a copy of the lab report showing the quantitative result and reference range and upload that lab report to ADB/Complo under the appropriate category/requirement.

If one of your primary titers is negative or equivocal and you require boosters, you will have **temporary compliance** while you complete the additional next steps required for compliance. Please be sure to stay on schedule for boosters and repeat titers and submit all steps to ADB/Complo as you go so that you can remain compliant while you wait.

If you complete all recommended boosters and your repeat titer is negative or equivocal, you will be considered a "Non-Responder" for that immunization, meaning that your body will not convert the vaccine to measurable immunity. In this case, your provider will complete a Non-Responder Form, which you will submit to ADB/Complo.

## Immunization Requirement Details

The following explanations will aid you in fulfilling immunization requirements. Please reach out to OCPC with questions.

**Measles, Mumps & Rubella (MMR)** – Documentation of prior vaccination is not sufficient for compliance. Instead, you must demonstrate immunity to Measles, Mumps, and Rubella via positive titers. Follow these steps:

1. Have your healthcare provider perform IgG titers for Measles, Mumps, and Rubella. Obtain and upload lab report(s) to ADB/Compilio. Note that you must enter data for Measles, Mumps, and Rubella titers separately, even if all information is contained in a single document.
2. If all three titers are positive, you'll be compliant!
3. If one or more of your titers are negative or equivocal, you should immediately have an MMR booster and then 6-8 weeks later a repeat titer. Your provider may recommend two boosters 28 days apart prior to your repeat titer. Submit documentation of each step as you go to receive/retain temporary compliance.
4. If your repeat titer is negative or equivocal, you'll be considered a "Non-Responder," and your provider will complete a non-responder form, which you will submit to ADB/Compilio.

**Varicella** – Documentation of prior vaccination or history of disease is not sufficient for compliance. Instead, you must demonstrate immunity to Varicella via a positive titer. Follow these steps:

1. Have your healthcare provider perform a titer for Varicella. Obtain and upload lab report to ADB/Compilio.
2. If your titer is positive, you'll be compliant!
3. If your titer is negative or equivocal, you should immediately have a Varicella booster and then 6-8 weeks later a repeat titer. Your provider may recommend two boosters 28 days apart prior to your repeat titer. Submit documentation of each step as you go to receive/retain temporary compliance.
4. If your repeat titer is also negative or equivocal, you'll be considered a "Non-Responder," and your provider will complete a non-responder form, which you will submit to ADB/Compilio.

**Hepatitis B** – Documentation of prior vaccination is not sufficient for compliance. Instead, you must demonstrate immunity to Hepatitis B via a positive HbsAb (Surface Antibody) titer. Follow these steps:

1. Determine whether you have previously completed the Hepatitis B series.
2. **If you have not completed the series**, immediately begin either the three-shot or two-shot series, whichever is recommended by your provider. Submit documentation of each step as you go to receive/retain temporary compliance. Once you've completed the series, wait one month and have your provider perform an HbsAb titer. Obtain and upload lab report to ADB/Compilio. If titer is positive, you'll be compliant. If not, skip to step 4 below.
3. **If you have completed the series**, have your provider perform an HbsAb titer. Obtain and upload lab report to ADB/Compilio. If titer is positive, you'll be compliant.
4. If your titer is negative or equivocal, you should immediately start a repeat three-shot or two-shot Hepatitis B series, whichever is recommended by your provider. Submit documentation of each step as you go so that you will receive/retain temporary compliance. Three-shot series: Dose 1, wait 1 month, Dose 2, wait 5 months, Dose 3, wait 1 month, repeat titer. Two-shot series: Dose 1, wait 1 month, Dose 2, wait 1 month, repeat titer.
5. If your repeat titer is also negative or equivocal, you'll be considered a "Non-Responder," and your provider will need to complete a non-responder form, which you will submit to ADB/Compilio.

**Tdap** – Your program requires documentation of a current Tetanus/Diphtheria/Pertussis (Tdap) vaccination. If your Tdap expires during your program, you will have to get a booster to retain compliance. No titer is required for Tdap.

**Seasonal Influenza Vaccine** – You are required to have an annual flu shot between August 1 and October 1. Obtain appropriate documentation including the date of vaccination, manufacturer, product name, lot number, and provider.

**COVID-19 Vaccine** – You must submit documentation of your primary COVID-19 vaccine dose(s)—two doses of Pfizer or Moderna or a single dose of Johnson & Johnson—and one booster dose. Note that current CDC guidelines define "full vaccination" as the primary series plus the bivalent booster (dated after 9/2/2022). Some agencies require adherence to CDC guidelines, and agency requirements are subject to change at any time. You will not be able to begin or continue a placement if you do not meet agency requirements. If approved by UConn for a medical or religious exemption, submit exemption approval to ADB/Compilio. Note that declining the COVID-19 vaccine may limit the availability of clinical/field site placements.



## Annual Tuberculosis Screening Requirement Details

Each year, your program requires that you fulfill compliance for the Tuberculosis category to demonstrate that you are free from active TB infection. You have two options for fulfilling this requirement:

1. **QuantIFERON or T-Spot Blood Test (Preferred)** – Single provider visit for bloodwork that will check for TB infection. Obtain and submit lab report to ADB/Complo.
2. **Two-Step Mantoux PPD Skin Test** – Two separate PPD skin tests performed 7-21 days apart. This option requires a total of four provider visits. You must submit both plant and read data for each PPD test. The process is as follows:
  - Visit 1 = Provider plants PPD #1 (wait 48-72 hours)
  - Visit 2 = Provider reads PPD #1
  - Wait 7-21 days from the implant date of first test
  - Visit #3 = Provider plants PPD #2 (wait 48-72 hours)
  - Visit #4 = Provider reads PPD #2

**Positive TB test or history of TB?** – Submit annual chest x-ray and Annual TB Screening Questionnaire (<http://ocpc.office.uconn.edu/TB>), including provider attestation that any recommended treatment is complete.

## Other Requirements Details

**Physical Exam** – Your program requires an annual physical exam, completed by your healthcare provider using the UConn Physical Exam form (<http://ocpc.office.uconn.edu/Physical>). Note that all fields are required except where labeled optional. Color vision screening and Clearance for N95 Fit Testing are both required. Please make sure that your provider completes all sections and do not submit an incomplete form.

**CPR Certification** – Your program requires that you obtain and maintain American Heart Association BLS (Basic Life Support) certification or a national EMT license. The AHA BLS course will include infant, child, adult, and one- and two-person CPR with use/management of automated external defibrillator (AED). Submit your certification card to ADB/Complo. Should your certification expire during your program, you must recertify to retain compliance.

**Health Insurance Card** – For compliance, you are required to maintain health insurance coverage throughout your program. Submit scans/photos of both the front and back of your insurance card. Should your insurance coverage change after initial submission, please submit updated information ASAP.

**Student Consent & Attestation** – Your program requires completion of the **Student Consent & Attestation**, which allows your program and OCPC to review your records and submit required information to your clinical or field placement site and reviews important information related to your placement. Complete this form directly within ADB/Complo by clicking “Enter Requirements” next to the category and following the prompts to review and electronically sign the form.

**HIPAA& OSHA Trainings** – You are required to complete annual HIPAA and OSHA Trainings through HuskyCT. To access the trainings, please [log into HuskyCT](#) and follow these steps:

1. On your Institution Page, scroll down to the box labeled “Self-Enroll Courses & Organizations for Students.”
2. Locate “Office of Clinical Placement Coordination (OCPC)” and click the organization name to enter
3. Click the green “Enroll” button on the left and follow any prompts to complete enrollment
4. Click HIPAA Training content module and watch the video training, checking “Reviewed” once complete; advance to the next screen and complete the HIPAA quiz with a score of 90% or higher
5. Click OSHA Training content module and watch the video training, clicking “Reviewed” once complete; advance to the next screen and complete the OSHA quiz with a score of 90% or higher
6. Click “My Certificates of Completion” in the left menu to access your certificates, which you will need to download or screenshot and submit to Complo using the corresponding HIPAA Training and OSHA Training requirements in ADB/Complo.

### Annual Background Check & Drug Screen Requirements – Order only when instructed

#### Criminal Background Check & FACIS 3

When instructed on May 1, purchase “LPC Screening Bundle” in ADB/Compilio, which includes both required background check items. Background checks include SSN trace, national sex offender search, OIG/GSA searches, state and/or county criminal search in all states of residence for the past seven years, and FACIS Level 3 screening. If you’ve lived internationally for 90+ consecutive days in the past seven years, you’ll also purchase an international criminal background check. Once complete, results will automatically port into compliance profile with no additional action needed.

##### Key Tips:

- Ensure that your primary name in ADB/Compilio matches **exactly** the name on your social security card (middle name/initial, suffix, hyphenation, etc). Double check that you’ve entered your social security number correctly. If there is a mismatch, you’ll have to order and pay for a new background check at your own expense.
- Watch UConn email for results (usually within a week) and reach out to [clinicalcasemanager@uconn.edu](mailto:clinicalcasemanager@uconn.edu) ASAP to resolve any flags. It’s your responsibility to follow-up right away and take any required next steps.

#### Drug Screen

When instructed on May 1, purchase “LPC Screening Bundle” in ADB/Compilio, which includes the required 12-panel urine drug screen. Then go to selected lab (Quest or Labcorp) to provide urine sample. Once complete, drug screen results will automatically port into your compliance profile with no additional action needed.

##### Key Tips:

- Reach out to testing site to confirm hours, times drug screens are administered, appointment policies, etc.
- Your drug screen order will expire after 14 days. If it expires, you must order a new drug screen at your own expense. There’s no possibility of adjusting the expiration date, so plan ahead.
- Flags – A “flag” on a drug screen alerts you to a problem that requires your immediate attention. It could result from the presence of a tested substance, an issue in the sample, etc. See how to avoid flags below.
  - If you have a concern about a potential flag, please reach out to [clinicalcasemanager@uconn.edu](mailto:clinicalcasemanager@uconn.edu) before you place your order. The Clinical Case Manager will provide confidential guidance about how to proceed. This **does not** mean that any potentially flagged issues will be acceptable for your program.
  - If you have a flag on your completed drug screen, you must reach out to [clinicalcasemanager@uconn.edu](mailto:clinicalcasemanager@uconn.edu) right away to begin the resolution process.
  - As the student, you have an affirmative responsibility to monitor the results of your drug screen and take necessary steps following any flags, including reaching out to [clinicalcasemanager@uconn.edu](mailto:clinicalcasemanager@uconn.edu).
- Drug Screens flagged as a negative dilute:
  - A negative dilute most often indicates overhydration. Do not overhydrate prior to your drug screen.
  - Under UConn policy, if your drug screen is flagged as a negative dilute, you must immediately complete a second drug screen within three days. You’ll start by purchasing a new drug screen in ADB/Compilio. If you are notified of the first test’s flag before noon, that day counts as day one of the three-day re-test window. Sundays and state holidays are excluded.
- You have two attempts to pass the drug screen. If your second test is flagged, you will be deemed to have failed your required drug screen and you will not be able to proceed with placement.
- Avoiding Flags:
  - Don’t use illegal drugs and notify [clinicalcasemanager@uconn.edu](mailto:clinicalcasemanager@uconn.edu) of any prescription medications. This includes Marijuana (recreational or prescription). Please see the full Marijuana statement at <http://ocpc.office.uconn.edu/DS>.
  - Don’t overhydrate as this can cause a diluted sample, which will result in a flagged drug screen.
  - Certain foods and medications (including but not limited to poppy seeds and antibiotics) may cause a false positive. Menstruation can sometimes also affect the result of a drug screen.
- Note that some contracts between UConn and agencies allow the agency to conduct random drug screens of students placed at the agency at any time without notifying UConn or the student. Please reach out to [clinicalcasemanager@uconn.edu](mailto:clinicalcasemanager@uconn.edu) if you have any questions or concerns.