

Compliance Guide for Clinical & Field Students Diagnostic Genetic Sciences

Compliance Questions? - Contact OCPC anytime!



Bambi Mroz, MA
Clinical Placement Compliance Specialist
ocpc.compliance@uconn.edu
Questions about ADB/Complio,
requirements, documents, deadlines, etc.



E. Carol Polifroni, RN, EdD, CNE, NEA-BC, ANEF Director & Clinical/Field Placement Case Manager 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.

Remember: You cannot participate in a clinical or field placement if you are not compliant in all required categories!

First Steps

- 1. Review the information in this guide and the full Compliance Overview for Clinical & Field Students training video playlist for your program at http://ocpc.office.uconn.edu/students.
- 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/Complio account (instructions below) and begin working on requirements.
- 4. Make any necessary healthcare provider appointments as soon as possible.

Setting Up Your ADB/Complio Account



Complio 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:

- 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/Complio 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/Complio 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/Complio Tracking Package

WHEN: Spring/summer of year prior to internship start

Once you've set up your ADB/Complio 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 "Diagnostic Genetic Sciences" as your program.
- 2. Click "Load Packages."
- 3. Unless otherwise instructed, locate "University of Connecticut Tracking Package" under the Immunization Package(s) heading. The initial term is 12 months, but you are required to maintain an active ADB/Complio subscription through the full length of your program. If your subscription expires before your program end date, you will have to renew at that time to remain compliant. At the time of renewal, you'll be able to choose a subscription length.
- 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

WHEN: November 1-15

- 1. Do not order until instructed or you will have to purchase another package!
- 2. When instructed in November, you'll repeat the order process to order the Basic Background Check (base price \$28.40, cost varies based on the states in which you have lived) and drug screen as instructed (your drug screen will vary based on your assigned internship site).
- 3. If you have lived internationally for 90+ consecutive days in the past 7 years, you must also purchase an International Criminal 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/Complio 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.

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/Complio 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/Complio 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/Complio 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 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 November 1

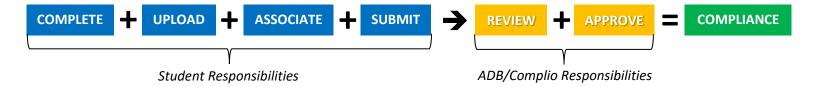
- Immunization Requirements
 - □ Measles, Mumps & Rubella (MMR) positive quantitative IgG titers
 - Varicella positive quantitative IgG titer
 - □ Hepatitis B –positive quantitative HbsAb titer
 - □ Tetanus* Current Tdap vaccination within 10 years
 - Seasonal Influenza Vaccine*
- □ Tuberculosis* QuantiFERON blood test or two-step Mantoux PPD skin test
- Other Requirements
 - □ Physical Exam* use form in UConn Clinical & Field Student Health Record
 - □ Program Forms complete within ADB/Complio
 - Health Insurance Card

Due November 1-15 – please wait for instructions before ordering

- Basic Criminal Background Check
- Drug Screen as instructed (varies by internship site)

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/Complio. 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/Complio. 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/Complio 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/Complio, simply follow these steps:

- 1. Log into your account at http://adb.uconn.edu
- 2. Use your ADB/Complio home screen to find the category you want to work on and click "Enter Requirements"
- 3. If you're completing a form within ADB/Complio, 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/Complio 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/Complio 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/Complio 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/Complio 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 detectable immunity. In this case, your provider will complete a Non-Responder Form, which you will submit to ADB/Complio.



Immunization Requirement Details

The following explanations should aid you in completing your immunization requirements for compliance. Please reach out to OCPC if you have any questions about next steps.

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 quantitative IgG titers. Follow these steps:

- 1. Have your healthcare provider perform a **quantitative IgG titer** for Measles, Mumps, and Rubella. Obtain and upload lab report(s) with quantitative results and reference ranges to ADB/Complio. Note that you must enter data for Measles, Mumps, and Rubella titer items 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 healthcare provider may recommend two boosters 28 days apart prior to your repeat titer. Submit documentation of each step as you go so you can 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/Complio.

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

- 1. Have your healthcare provider perform a **quantitative lgG titer** for Varicella. Obtain and upload lab report with quantitative results and reference ranges to ADB/Complio.
- 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 healthcare provider may recommend two boosters 28 days apart prior to your repeat titer. Submit documentation of each step as you go so you can 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/Complio.

Hepatitis B – Documentation of prior vaccination is not sufficient for compliance. Instead, you must demonstrate immunity to Hepatitis B via a positive quantitative HbsAb 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 so that you will receive/retain temporary compliance. Once you've completed the series, wait one month and have your provider perform a quantitative HbsAb titer for Hepatitis B. Obtain and upload lab report with quantitative results and reference ranges to ADB/Complio. If your 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 a quantitative HbsAb titer. Obtain and upload lab report with quantitative results and reference ranges to ADB/Complio. If your titer is positive, you'll have compliance.
- 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/Complio.

Tetanus – 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, expiration, dose, injection site, and name/title/etc. of healthcare provider administering the vaccination.



Tuberculosis 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/Complio.
- 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

Other Requirements Details

Physical Exam – Your program requires an annual physical exam, completed by your healthcare provider using Part 1 of the UConn Clinical & Field Student Health Record. Note that all fields are required except where labeled optional. Color vision screening and N95 Mask Fit Clearance are both required for your program. Please make sure that your provider completes all sections and do not submit an incomplete form.

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.

Program Forms – Your program requires completion of several forms, including the Student Authorization & Consent for Review & Disclosure form, which allows your program and OCPC to review your records and submit required information to your clinical or field placement site. Other forms include a Personal Property Waiver, Medicare Exclusion Waiver, Employer Release, and Photo/Info Release. Complete these forms directly within ADB/Complio by clicking "Enter Requirements" next to the category and following the prompts.



Background Check & Drug Screen Requirements - Order only when instructed

Criminal Background Check

- When instructed, purchase the "Basic Background Check" item in ADB/Complio.
- Background checks include SSN trace, national sex offender search, OIG/GSA searches, and state and/or county criminal search in all states of residence for the past seven years.
- Ensure that your primary name in ADB/Complio matches **exactly** the name on your social security card. If there is a mismatch, you'll have to order and pay for a new background check at your own expense.
- International Background Check If you've lived internationally for 90+ consecutive days in the past seven years, you'll also purchase an international criminal background check (separate item you can add to your order).
- Watch your UConn email for results (usually within a week) and reach out to clinicalcasemanager@uconn.edu
 ASAP to resolve any flags. It is your responsibility to follow-up and take any required next steps.
- Background check results will automatically port into your compliance profile with no additional action needed.

Drug Screen

- When instructed, purchase your drug screen in ADB/Complio. The drug screen you'll be instructed to purchase
 will vary based on your assigned internship site. Please wait until you receive instructions to ensure that you
 purchase and complete the correct urine drug screen and avoid having to purchase and complete a second
 screening. Once purchased, you'll complete your screening at the site you select at the time of your order (Quest
 or LabCorp affiliate).
- We recommend reaching out to your selected testing site directly to confirm hours, specific times drug screens are administered, appointment policies, etc. Not all sites accept drug screen clients during all business hours.
- If you have concerns about potential flags on your drug screen, reach out to clinicalcasemanager@uconn.edu
 ASAP to discuss receive guidance about how to proceed. Note that a conversation with the Clinical Case
 Manager **does not** mean that any potentially flagged issues will be acceptable for your program.
- Note that your drug screen order will expire after 14 days. If your order expires before completion, you will have to
 order and pay for a new drug screen in ADB/Complio at your own expense. There is no possibility of adjusting the
 expiration date of your order so please plan ahead.
- Once your drug screen is completed, watch your UConn email for the result and contact <u>clinicalcasemanager@uconn.edu</u> immediately if you have a flag. It is your responsibility to follow-up and take any required next steps.
- Regardless of the reason for the flag, flagged drug screens must be repeated within three days. This means that
 you must purchase a new drug screen in ADB/Complio at your own expense and complete it at your selected site
 within three days.
- Under UConn policy, you have two attempts to pass the drug screen and any diluted sample will be considered a
 positive result. If you have a diluted sample on your first attempt, you must reach out to
 clinicalcasemanager@uconn.edu and then order and pay for a new drug screen within ADB/Complio at your own
 expense. As noted above, re-tests must be completed within three days of the first test.
- Note: In some instances, menstruation can affect the result of a drug screen, so please plan accordingly if this is a concern for you.
- Drug screen results will automatically port into your compliance profile with no additional action needed.

Remember: You cannot participate in a clinical or field placement experiences if you are not compliant in all required categories!

Questions? Reach out to ocpc.compliance@uconn.edu