

Compliance Guide for Clinical & Field Students Doctor of Physical Therapy

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.

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/DPT>.
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 subscription (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:

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/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 & Screening Items

WHEN: Summer/Fall of program 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. 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, so you will need to renew your subscription to remain compliant. At the time of renewal, you'll be able to choose a subscription length.
2. 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: July 1-15

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 "DPT Screening Bundle," which includes three items: Basic Background Check (base price \$28.40, cost varies based on the states in which you have lived), FACIS Level 3 (\$7.00), and 12-panel drug screen (\$59.00).
3. If you have lived internationally for 90+ consecutive days in the past seven 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.
3. 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 July 1-15

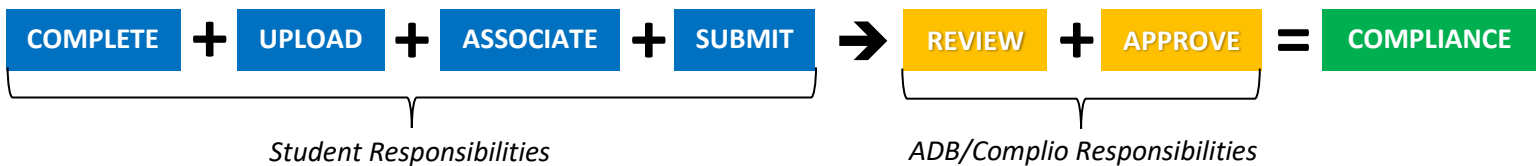
- Background Check
- FACIS Level 3
- 12-Panel Drug Screen

Due October 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*
 - 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* – American Heart Association BLS Provider or National EMT Certification
 - Student Consent & Attestation – complete within ADB/Complio
 - Health Insurance Card
 - HIPAA Training – submit certificate of completion from HuskyCT
 - OSHA Training* – submit certificate of completion from HuskyCT

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 Requirement"
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 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/Complo. 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/Complo.

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/Complo.
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/Complo.

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/Complo. 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/Complo. 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/Complo.

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

COVID-19 Vaccine – You must submit documentation of full COVID-19 vaccination that meets current CDC guidelines. Currently, this means a full primary series (two doses of Pfizer or Moderna or a single dose of Johnson & Johnson) and one bivalent booster dated after 9/2/2022. If approved by UConn for a medical or religious exemption, submit approval email to ADB/Complo. 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
 - 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 from UConn Clinical & Field Student Health Record, including provider attestation that any recommended treatment is complete.

Other Requirements Details

Physical Exam – Your program requires a physical exam every two years, completed by your healthcare provider using the UConn Physical Exam form (<http://ocpc.office.uconn.edu/Physical>). Note that all fields are required, including color vision screening and clearance for N95 fit testing. 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 in order 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 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

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 categories

Background Check & Drug Screen Requirements – Order only when instructed

Criminal Background Check & FACIS 3

When instructed on July 1, purchase “DPT Screening Bundle” in ADB/Complio, 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/Complio 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 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 July 1, you’ll purchase “DPT Screening Bundle” in ADB/Complio, 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.
- Reach out to clinicalcasemanager@uconn.edu ASAP to discuss concerns about potential flags. An advance conversation **does not** mean that any potentially flagged issues will be acceptable for your program.
- 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.
- Watch UConn email for result and contact clinicalcasemanager@uconn.edu immediately if you have a flag. It’s your responsibility to follow-up and take any required next steps.
- Flagged drug screens must be repeated within three days, and repeat orders are always at your own expense. Under UConn policy, you have two attempts to pass the drug screen. A second positive test result will be disclosed to your program and potential placement agency.
- Avoiding Flags:
 - Don’t use illegal drugs and notify clinicalcasemanager@uconn.edu of any prescription medications
 - 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. Be wise about eating habits leading up to drug screen and discuss any prescription medications with the Clinical Case Manager in advance. Menstruation can sometimes also affect the result of a drug screen.
 - Marijuana – The recreational use of marijuana is now legal in Connecticut and other states. However, UConn is required to continue testing for the presence of marijuana and to share drug test results that are positive for marijuana with agency partners. There has been no indication that agencies will be revising their drug testing requirements. As such, it is most likely that agencies will deem drug test results that are positive for marijuana (including marijuana used for medical purposes with a valid prescription) as failing to meet their drug testing requirements. UConn programs are not responsible for arranging placements for students who are unable to meet an agency’s requirements. Additionally, even if such an agency can be identified, there is no guarantee that a student who has tested positive for marijuana can be placed at that specific agency for a given rotation. Students who do have a prescription for medical use of marijuana are strongly encouraged to inform the Clinical Case Manager in advance of the drug screen. Please also be aware that, under some contracts between UConn and agencies, the agency can require random drug screens of students placed at the agency at any time without giving notice to UConn or to the student. If you have any questions or concerns, please reach out to clinicalcasemanager@uconn.edu.