



General Health Compliance Policy

I. PURPOSE

Students, faculty or volunteers (associates) at Grand Valley State University may participate in clinical training activities at affiliated facilities. In order to be protective of everyone involved individual health and the health and safety of the community served; certain participation guidelines have been established.

Infectious, communicable diseases are common in many clinical training sites and may be a threat to our associates. During the performance of clinical training, fieldwork, research or internship activities, our associates may interact and be exposed to clients and research participants with diseases such as but not limited to tuberculosis (TB), hepatitis B (HBV), Influenza, and other infections.

University policy, state and federal statutory regulations, accreditation standards for affiliated agencies require that our associates comply with certain health, safety and legal requirements applicable to their occupation and that those individuals demonstrate particular cognitive and clinical competencies consistent with their program's minimum practice standards. As such, Grand Valley State University is contractually mandated to ensure all associates attain and maintain full compliance with each program's set compliance requirements.

II. AFFILIATION AGREEMENTS

Affiliation agreements are to be negotiated with facilities of interest to establish a formal arrangement between GVSU and the facility, for the purpose of student clinical/fieldwork educational experiences. For definition purposes, the words clinical, internship and fieldwork will be interchangeable when indicating health compliance requirements. Such agreements are to contain appropriate clauses recommended by GVSU Legal Counsel to protect GVSU, its students and faculty/staff, and the community in which they interact. GVSU faculty/staff and students are to comply with all compliance requirements prior to entering the facility for clinical/fieldwork experience. It is the aim of the Health Compliance Office to be responsible for negotiating, housing and maintaining affiliation agreements for GVSU programs/colleges that send students into community facilities as part of their education process. (See addendum A)

Affiliation agreements are to be negotiated through collaboration with the program/college designated representative, or reviewed by the Office of the Vice Provost for Health (Health Compliance Office) staff to insure the accuracy and relevance of each agreement. Health Compliance requirements listed on the established Health Compliance Blackboard accounts shall be established based upon stipulations contained within the affiliation agreements.

Establishment or review of the affiliation agreement by the Health Compliance Office shall include authorized GVSU and facility signatures, and upon completion the agreement shall be accessible to faculty and stakeholders on a GVSU software site for reference. Authorized

signatories to include the Dean of the program and or their appointed are fully responsible for the content contained in each Affiliation Agreement. The Health Compliance office shall monitor Health Compliance process, provide appropriate access to Health Compliance accounts and notify program coordinators of Health Compliance status issues. Faculty and students are not to be placed for educational experiences in facilities until the affiliation agreement has been completed, signed by both parties, and the GVSU program representative is notified of agreement active status. Faculty coordinating student placements in clinical/fieldwork/internship sites are responsible for approving student placement based on Health Compliance being met prior to any participation in educational experiences at a facility.

In order to service students, the University and affiliated facilities, program requests to establish or renew an affiliation agreement should be sent to the Health Compliance Office a minimum of eight weeks prior to a student placement. The Health Compliance Office will make every effort to establish the agreement prior to the internship date. If the agreement cannot be established in a timely manner there will be notification to the program coordinator indicating the issue and possible completion date. Urgent or short-notice requests for an affiliation agreement is discouraged. It may not be possible to establish an agreement on short notice prior to the internship start date. Upon completion, the Program Clinical Coordinator will receive email notification that the agreement is active.

Program Clinical Coordinators can submit a request for an affiliation agreement by written request or through email by providing the following information:

- Facility full name and address
- Facility representative name, title, phone number, and email address
- Student name and internship start and end date
- Program Clinical Coordinator name, email, and phone number (if not submitted via email)

III. ACCOUNTABILITY

A. Student, Faculty and Volunteers

All student, faculty, and volunteers (non-financially compensated positions) are responsible for maintaining their own health, protecting themselves and the clients or research participants with whom they interact from communicable, infectious disease, and attaining and maintaining compliance with identified requirements. Students and volunteers maintain full financial responsibility for obtaining all compliance requirements. Faculty compliance requirements shall be paid for by the GVSU Health Compliance Program when authorized health care providers and vendors are used. Faculty members are financially responsible for obtaining and maintaining professional licensing and specialty certification. A list of approved compliance requirements and authorized providers shall be listed within the faculty's Health Compliance Blackboard account.

Students admitted to their program of study must achieve compliance with all health, safety and legal requirements applicable to the program to which they have been admitted prior to their program deadline. Students must maintain full compliance with all renewable requirements throughout their tenure with the University.

Faculty and volunteers upon hire are to attain and maintain full compliance with renewable requirements throughout their tenure with the University.

GVSU students and faculty participating in Health Compliance regulated programs should retain their original documents. Direct uploading of electronic document files into Blackboard is recommended to assure submission, eliminate paper copies, decrease the possibility of confidential information exposure and decrease errors. Less advisable options for submission are; email using PDF files, fax, US mail, drop box or personal delivery to the Office of the Vice Provost for Health.

Supplementary requirements may be contractually mandated by any facility to which students may be assigned. Notification to the student and Health Compliance Office of additional requirements shall be made by the placement coordinator. These additional elements are required, non-negotiable and deemed as critically important as University requirements.

Student Consequences for Non-Compliance: Upon program entry, any student who fails to attain or maintain compliance by their programs deadline date(s) are to be suspended from any clinical/fieldwork activities in addition to a possible hold placed on their University student account until requirements have been met.

Faculty and Volunteer Consequences for Non-Compliance: Clinical participation will be suspended.

B. Health Compliance Office

All compliance records will be maintained for current students and made accessible to the student up to one year after graduation through the secure electronic Blackboard site. One year after graduation all documents will be archived for seven years.

Compliance records for faculty and volunteers will be maintained while the individual is affiliated with the university. Records will be archived after one semester of inactivity, retained for seven years.

Duties of the Health Compliance Office within the Office of the Vice Provost for Health include but are not limited to:

- Administration and maintenance responsibilities for the Blackboard compliance site. Requests for new classes/organizations to be added are to be in writing with a list of the students to be “participants” and approval for “leaders” to have access to the accounts or others with limited access. The list should include the name, G# and Username/ID. Faculty additions should also include an email address and or phone number.
- Annually update of OSHA, Bloodborne Pathogen, TB& Infectious Diseases, FERPA and HIPAA training modules.
- Review and maintain submitted documents in the Blackboard compliance data base.

- Ensure that required items submitted meet standards set forth by the University, state and federal regulations, affiliation contracts, and the Center for Disease Control.
- Establish processes for notification and restrictions of non-compliance with Health Compliance requirements.
- Notify students/faculty/volunteers via email of non-compliance status and/or pending expiration of a compliance items including possible restrictions. Notification process for Health Compliance includes but not limited to:
 - The 1st email will be for the initial set up of the organization with instructions regarding Blackboard use, the process for meeting requirements and expectations
 - A 2nd reminder email will be sent approximately 2 weeks prior to the Health Compliance requirement date set by the program coordinator to assist in timely completion of compliance. This email will be directed to all those who have not yet met the Health Compliance requirements. It will contain instructions to visit their Blackboard account to obtain exactly what has not yet been met; notification that their program director will be informed of the non-compliant status if not met on the due date; and an alert that they will not be able to access the fieldwork/clinical areas and possibly have other restrictions up to and including a hold placed on their GVSU student account on the due date until full compliance is met.
 - A 3rd email will be sent shortly after the indicated due date, to the program coordinator/director with a list of those of are not in compliance.
 - Monitoring of each Blackboard account will continue for those compliance requirements that expire annually or periodically. Reminder emails of pending expiration will be sent 2-3 months prior expiration including possible restrictions up to and including a hold being placed on student University accounts if required items do not remain current.

IV. COMPLIANCE REQUIREMENTS

The following are detailed compliance items that may comprise of, but are not limited or subject to each program of study. (*See Compliance Blackboard Site for program specific compliance requirements.*)

A. Physical Exam

Upon matriculation, students must submit a completed Health and Immunization form available on the electronic Blackboard Health Compliance site. The form must be completed by one of the following licensed professionals; physician, certified Nurse Practitioner or Physician Assistant.

B. Immunizations & Serologic Titers: Based on CDC recommendations for Health-Care Personnel:

- Tetanus and Diphtheria
Following a primary series, a Td or Tdap booster within the last ten years

If younger than age 65, individuals should be given a onetime dose of Tdap.

- Measles (Rubeola), Mumps and Rubella (MMR)
Documented 2 childhood vaccinations OR titer results indicating immunity. (If vaccination documents are not available and titer is negative revaccination will be required.)
- Hepatitis B
Immunization series of three vaccinations are required AND titer results indicating immunity. (If titer results remain negative after 2 series of 3 vaccinations then test for HBsAg and total anti-HBc to determine their HBV infection status. If test negative for HBsAg and anti-HBc then consider as non-responder and susceptible to HBV infection and encourage precautions and counseling for prevention.) If record of the initial series of Hepatitis B vaccination is not able to be obtained a note shall be made in the Blackboard account of the effort to obtain the record and the result of titer indicating immunity.
- Varicella (Chicken Pox)
Documented 2 vaccinations OR confirmed disease by medical provider OR titer results indicating immunity. (If vaccination documents are not available and titer is negative revaccination will be required.)
- Influenza
Seasonal influenza vaccination (unless medically contraindicated)
Highly recommended but may be program and/or facility placement specific
Additional strain influenza (H1N1) if applicable and available
- Meningococcal
Recommended for persons at high risk for exposure.

C. TB Screening

Tuberculosis screening must be validated by an initial two-step Tb screening (Mantoux skin test) and annual one-step screening thereafter. If there is a medically documented allergy to TB skin testing or TB skin tests have been positive in the past, submission of an Annual Tuberculosis screening questionnaire (completed by a health care provider) and results of a chest x-ray within the past five years is required.

Two-step baseline PPD will be required for the following individuals: those who will be entering the annual TB testing program, those who have not been skin tested in the previous year and those who have historically had the BCG vaccine or who were born in a TB endemic country.

Rationale

Boosted reactions occur in people who have been infected with any species of mycobacterium or by past BCG vaccination. These persons develop a hypersensitivity to tuberculin which may gradually wane over the years. When skin is tested at this point, these persons may have a negative reaction. However, the stimulus of this skin test may recall the hypersensitivity, which increases the size of the reaction to a subsequent test. This may be falsely interpreted as a recent conversion from negative to positive.

Two-Step Screening means one must submit documentation of results of two TB tests. Step two must be completed no sooner than 7 days and within 21 days of the initial TB test.

GVSU prohibits individuals from interpreting their own TB test results or from asking faculty to make this determination. Only the test source may interpret the results and issue a final reading determination.

Optional TB testing includes:

1. QuantiFERON – TB Gold In-Tube test (GFT-GIT)
2. T-SPOT Tb Test (T-Spot)

These TB blood test (also called interferon-gamma release assays or IGRAs) measure how the immune system reacts to the bacteria that cause TB. An IGRA measures how strong a person's immune system reacts to TB bacteria by testing the person's blood in the laboratory. Positive IGA means that the person has been infected and additional test are needed to determine if the disease is latent or active.

D. CPR Certification

Cardiopulmonary resuscitation (CPR) certification is specific to program requirements. Certification must remain valid for your tenure with the school. ACLS may substitute for this requirement. On-line initial or renewal CPR certification courses are not acceptable sources for certification.

E. Criminal Background Check

Upon matriculation or hire there is a seven year state of residency, National Sexual Offender Registry; and National Healthcare Fraud and Abuse scan performed GVSU will only accept criminal background checks completed through a designated University vendor. Directions to obtain criminal background checks are available on the electronic Blackboard Health Compliance site. Initial positive criminal background checks results will be reviewed by the Health Compliance Officer. The Health Compliance Officer will notify the designated program representative for students and the Dean of the College for faculty, when there is a positive background check. The program representative or Dean of the College may call together the "Committee for Establishing Practice Guidelines" to assist in determining the course of action if needed. All students, faculty and volunteers must notify the Health Compliance Officer of any convictions, arrests, detentions, charges or investigations by any law enforcement authorities that occur after the Certified Background inquiry is complete. The Dean of the program and or their designee will be notified by the Health Compliance Office if known additional criminal investigations occur. Please be advised that subsequent checks may be requested in response to the requirements of a clinical education site. The discovery of a criminal record will not necessarily result in the revocation of an acceptance offer or expulsion from a program of study. Students who do not pass the criminal background check may be subject to rescheduling or loss of training opportunities that may affect licensure after graduation. Individuals have the right to review the criminal background check reports for accuracy by contacting the judicial institution or background check vendor.

F. 10-Panel Drug Screen

A 10-panel drug screen shall be performed upon matriculation, hire or as a clinical/fieldwork site agreement indicates. GVSU will accept drug screens completed through the University designated vendor or testing done outside GVSU's designated vendor with a complete report not older than 2 months. Directions to complete a drug screen are available on the Blackboard Health Compliance site. Drug screens may be repeated if deemed too old for clinical/fieldwork site. Repeat drug screens will be requested within one week if initial test results are positive. If a second test remains positive after being reviewed by the MRO (medical review office) and not declared medically cleared by the MRO the Health Compliance Officer will notify the designated program representative for students and the Dean of the College for faculty. The program representative or Dean of the College may call together the "Committee for Establishing Practice Guidelines" to assist in determining the course of action if needed.

G. Fingerprinting

Directions to fulfill this requirement are available on the Blackboard Health Compliance site. Fingerprint reports submitted from a vendor other than the one indicated on the Blackboard site must be from within the State of Michigan through the designated live scan process and not older than 2 months. . Initial positive fingerprint check results will be reviewed by the Health Compliance Officer. The Health Compliance Officer will notify the designated program representative for students and the Dean of the College for faculty, when there is a positive fingerprint check. The program representative or Dean of the College may call together the "Committee for Establishing Practice Guidelines" to assist in determining the course of action if needed.

H. Color Blind Testing

Program specific. Directions available on Blackboard Health Compliance site.

I. OSHA Training

To be completed online through the Blackboard Health Compliance site with 80% or greater to pass.

J. HIPAA Training

To be completed online through the Blackboard Health Compliance site with 80% or greater to pass.

K. FERPA Training

To be completed online through the Blackboard Health Compliance site with 80% or greater to pass.

L. Tuberculosis and Infection Control Training

To be completed online through the Blackboard Health Compliance site with 80% or greater to pass

M. Respiratory FIT testing

Program specific.

N. If applicable, Current and unrestricted professional license

Licensed faculty and students must maintain a current unrestricted license to practice throughout their tenure with the school.

O. Authorization to Receive & Release Information

All majors must print, sign and submit an Authorization to Receive and Release Information form available on the Blackboard Health Compliance site.

P. Refusal to Consent to Vaccination / Hepatitis B Waiver

It is the right of students and faculty to refuse immunization vaccinations. In such cases a “Refusal to consent to Vaccination” and/or “Hepatitis B Waiver Form” must be signed by the student/faculty. These signed documentations are to be kept in the Blackboard account to support the non-compliant grade for that specific requirement and notification of potential consequences of refusal up to and including not being able to complete their clinical/fieldwork/internship or complete their program requirements for graduation and any and all liability that may arise directly or indirectly as a result of their refusal of vaccination.

The usual notification process regarding non-compliance status and placement of student account restriction apply. Student account restriction may only be lifted by approval of the program director with the understanding the student cannot use contracted facilities with Health Compliance immunization requirements.

V. Renewable Compliance Requirements

The following are to be renewed prior to due date indicated within the Blackboard column.

A. Annually:

- Tuberculosis Screening validated by annual TB screening or, if TB skin test positive, submission of Annual Tuberculosis screening Questionnaire and results of a chest x-ray within the past five years.
- Seasonal Influenza vaccination (recommended but optional for some programs) Additional Strain Influenza vaccination (H1N1) if available.
- OSHA/HIPAA/FERPA /TB & Infection Control training/Bloodborne Pathogen post-testing (for nursing program)

B. Variable timeframe:

- CPR Certification
- If applicable, professional licensure. Licensed faculty and licensed students must maintain a current unrestricted license to practice throughout their tenure with the school.

VI. Resources

Unless otherwise stated in the policy, students may obtain Health Compliance requirements at their Healthcare provider of choice. References for additional Healthcare and service providers are located on Blackboard.

References:

U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, Morbidity and Mortality Weekly Report (MMWR), November 25, 2011, Recommendations and Reports / Vol. 60 / No.7.

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Office DFS/Simulation-center-data/Compliance/Policies and Procedures