



GVSU Health Compliance Policy

I. PURPOSE

Students, faculty, staff and volunteers (associates) at Grand Valley State University (GVSU) may participate in clinical or non-clinical experiential education or research (placements) at health-related affiliated organizations. In order to be protective of everyone involved, associates and the community served, certain participation guidelines have been established.

During placements, associates may interact with or be exposed to clients who are immunocompromised, or with diseases such as, but not limited to, tuberculosis (TB), hepatitis B, influenza, and other infectious conditions.

University policy, state and federal statutory regulations, and accreditation standards for academic programs and affiliated organizations require that our associates comply with certain health, safety, and legal requirements. As such, GVSU is contractually mandated to ensure all associates attain and maintain full compliance as defined in its affiliation agreements.

II. AFFILIATION AGREEMENTS

Affiliation Agreements, established for the purpose of placements, are a contractual relationship between GVSU and affiliated organizations to specify responsibilities and liabilities of each party. GVSU does not accept single page Memorandums of Understanding (MOUs) or single page Training Site Agreements (TSA) in place of Affiliation Agreements.

The Health Compliance Office is responsible for executing, obtaining authorized signatures, and maintaining Affiliation Agreements for GVSU's health-related academic programs and for its other academic programs that utilize health-related affiliated organizations for placements. GVSU authorized signatories include program deans, their signatory designees, the Vice Provost for Health and those individuals possessing signature authority at affiliated organizations.

An Affiliation Agreement must be established prior to all placements. Student placements *within* GVSU do not require an Affiliation Agreement. Requests for new Affiliation Agreements for approved student placements must be sent via email to the Health Compliance Coordinator as soon as possible, but no less than twelve (12) weeks prior to planned placement. The Health Compliance Coordinator cannot guarantee the length of time it will require to fully execute an Affiliation Agreement with a particular site. Associates may not begin their planned placement until after the Affiliation Agreement is fully executed. GVSU faculty or academic program representatives who coordinate placements (Program Coordinators) are responsible for educating students regarding this Affiliation Agreement policy and the associated timeframes regarding Affiliation Agreement requests.

Program Coordinators must submit a request for an Affiliation Agreement by email by providing the following information:

- Affiliated facility's full name and address
- Affiliated facility's representative name, title, phone number, and email address
- Student's planned placement start date

- Affiliated facility's authorized signatory name and title, if known

If placement is considered at an international location the Program Coordinator and student should review the *International Clinical Placement Site for Health Profession Students Policy* and contact the Padnos International Center.

Per GVSU's Legal Division, inactive Affiliation Agreements older than seven (7) years shall be deleted from GVSU's contract management system (Contract Logix) and hard copies shall be shredded.

III. ACCOUNTABILITY

A. Associates

Faculty coordinating student placements in affiliated organizations are responsible for approving student placements based on health compliance requirements being met prior to any participation in a placement at an affiliated organization.

Health compliance requirements for each program shall be established based upon requirements contained within the Affiliation Agreements. All associates are responsible for protecting their own health and the clients or research participants with whom they interact by attaining and maintaining compliance with identified health compliance requirements.

Students and volunteers maintain full financial responsibility for obtaining all compliance requirements. Faculty and staff compliance requirements shall be paid for by the GVSU Health Compliance Program **when authorized health care providers and vendors are used**. Faculty and staff members are financially responsible for obtaining and maintaining professional licensing and specialty certification. A list of health compliance requirements and authorized providers and vendors shall be specified in the faculty and staff's health compliance account.

By the required due date, students must achieve compliance with all health compliance requirements applicable to the program to which they have been admitted. Students must maintain full compliance with all requirements until the student has graduated, or until the program has submitted written communication to the Health Compliance Officer that all placement activities required for graduation have been completed.

Faculty, staff, and volunteers are to attain and maintain full compliance with all requirements throughout their tenure with the GVSU.

Consequences for Non-Compliance: Health compliance audits will be conducted on a regular basis. Reports will be forwarded to the appropriate Program Coordinator with the recommendation that associates who fail to attain or maintain compliance by their program's due date or as otherwise required be restricted from any placement activities at affiliated organizations until compliance is achieved.

GVSU associates participating in health compliance regulated programs should retain their original documents. Direct uploading of electronic document files into an individual's health compliance account is recommended to assure, eliminate paper copies, minimize risk in a breach of confidentiality, and to decrease errors.

Additional requirements may be contractually mandated by affiliated organizations to which students are placed. These additional requirements are non-negotiable. To the extent known, additional requirements are documented in Contract Logix. Program Coordinators are responsible to review contractual requirements for each placement site either on Contract Logix, or via the Excel spreadsheet distributed monthly by the Health Compliance Coordinator. The Program Coordinator will notify the Health Compliance Officer of any associate with additional health compliance requirements. The Health Compliance Officer will indicate the

additional requirements in the associate's health compliance account and track for completion.

Each semester, upon request from the Office of the Vice Provost for Health, Program Coordinators are responsible for submitting their program's placement data for entry into the GVSU contract management system. The data required per student includes: student's first and last name, last four digits of student's G#, student's email address, name of facility of placement, facility agency (if applicable), facility address, timeframe of placement and total number of hours. When the placement involves a preceptor, the following information should be provided: assigned preceptor's first and last names, each assigned preceptor's email address, and phone number. Submission must conform to requested format.

In the event that a student leaves a program, or a placement, prior to completing the rotation, the Program Coordinator will inform the student's preceptor and the Health Compliance Office of the student's departure.

B. Health Compliance Office

All compliance records will be maintained for current students and made accessible to the student after graduation.

- Students whose health compliance tracking is maintained on Blackboard will have access to their information for up to one year after graduation through the Blackboard site. One year after graduation, all documents will be archived for seven years.
- Students whose health compliance tracking is maintained on CastleBranch will have lifetime access to the information they submitted to their CastleBranch account.

Compliance records for faculty, staff, and volunteers will be maintained while the individual is affiliated with GVSU. Records will be archived after one semester of inactivity, and 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:

- Negotiate, execute and maintain Affiliation Agreements (new/renewals)
- Develop and submit reports related to placements including, but not limited to, NC-SARA reports for the Office of the Provost
- Communicate periodically to Program Coordinators regarding all Affiliation Agreements and additional health compliance requirements
- Provide support for accreditation body visits relating to Affiliation Agreements and health compliance, upon request
- Administer and maintain health compliance information on Blackboard and with CastleBranch.
- Update health compliance training modules annually, including, but not limited to:
 - Bloodborne Pathogens
 - Tuberculosis (TB) and Infection Control
 - Family Educational Rights & Privacy Act (FERPA)
 - Elder Justice Act of 2009
 - Health Insurance Portability and Accountability Act (HIPAA)
 - Intellectual Property
- Review and maintain documents submitted to Health Compliance organizations on Blackboard
- Submit health compliance requirements to CastleBranch
- Audit CastleBranch grading to ensure compliance with GVSU policy
- Provide for associates, upon request and as outlined in Affiliation Agreements, clinical passport letters or other forms of compliance attestation
- Generate, process and maintain record of preceptor *Affiliated Clinical and Research Faculty* appointment letters and certificates

- Assist with obtaining placement sites, as needed
- Ensure that required items submitted meet standards set forth by GVSU, state and federal regulations, Affiliation Agreements, and the Centers for Disease Control and Prevention (CDC)
- Establish processes for notification and recommendation for participation restrictions for non-compliance
- Notify associates via email of non-compliance status and/or pending expiration of compliance items
- Notification process for Health Compliance includes, but not limited to:
 - The first notification sent will be for the initial set-up of the organization with instructions regarding health compliance system use, expectations and the process for meeting requirements.
 - A second notification will be sent approximately two weeks prior to the Health Compliance due date to assist in timely completion of compliance requirements. This email will be directed to all associates who have not yet met the Health Compliance requirements. It will contain instructions for the associate to visit their health compliance account to identify requirements that remain outstanding; notification that their program has been informed, that they will enter non-compliant status if not met by the due date; and an alert that, if non-compliant, they will not meet the requirements to enter affiliated organizations for placement activities.
 - After the indicated due date, additional notices will be sent to associates who are non-compliant, and a list of those associates that are non-compliant will be sent to the Program Coordinator.
 - Monitoring of each health compliance account will continue for those compliance requirements that expire annually or periodically. Notification emails will be sent to associates as needed.

IV. PERSONAL PROTECTIVE EQUIPMENT (PPE)

All associates will wear appropriate PPE while at a GVSU facility or an experiential learning placement site, in accordance with CDC guidelines and any applicable executive orders, even if the placement site indicates not required; i.e. a cloth face mask covering the mouth and nose, at all times in indoor spaces and when 6 feet of social distancing is not feasible outdoors; or, face shields, in addition to face masks, when person to person interactions occur within less than 6 feet or procedures are conducted that might be aerosol generating. Other PPE may be required.

V. COMPLIANCE REQUIREMENTS

The following are detailed compliance elements that may be required for placements at health-related organizations as outlined in each Affiliation Agreement. Each program will communicate their specific health compliance requirements to all associates.

A. Physical Exam

If required by the program, students must submit a completed *GVSU Health and Immunization Form* available in the associate's health compliance account in Blackboard or CastleBranch. The form must be completed by one of the following licensed professional healthcare providers within 12 months prior to submission: physician, nurse practitioner or physician assistant.

B. Immunizations & Serologic Titers:

Documentation of immunizations and titers, when required by program, must be submitted via one of the following mechanisms:

- *GVSU Health and Immunization Form* or *GVSU Immunization Form* completed/signed by a licensed professional healthcare provider
- Copy of a state immunization registry or card
- Copy or screen print from a patient portal
- Printed or handwritten documentation of immunization verified by a healthcare provider
- Receipt from a pharmacy or healthcare provider showing name, date of service, service rendered

- Lab report (titer)

The following immunizations may be required based on CDC Recommendations for Healthcare Personnel (unless medically contraindicated):

- Tetanus, Diphtheria, and Pertussis (Tdap) – Must Meet Criteria 1 and 2:
 - Criteria 1: One dose of Tetanus, Diphtheria, and Pertussis (Tdap) after age 10, regardless of when previous dose of Tetanus Diphtheria (Td) was received **AND**
 - Criteria 2: A Td or Tdap vaccination within the last ten years;
- Measles (Rubeola), Mumps and Rubella (MMR)
 - Documented two vaccinations **OR** titer results indicating immunity;
 - If vaccination documents are not available and/or one or more titers are negative, vaccination/revaccination is required;
- Hepatitis B
 - Documented immunization series of three doses or Engerix-B or Recombivax HB or two doses of Heplisav-B.
 - Hepatitis B surface antibody titer indicating immunity as required by program:
 - If the associate's titer result is negative after initial vaccination series, a booster/challenge vaccine, and/or an entire second series of vaccinations is required, followed by a titer four to six weeks after last vaccination;
 - If subsequent titer is negative following a booster/challenge vaccine, the remaining vaccines in the second series must be completed, followed by a titer four to six weeks after last vaccination;
 - If final titer is negative following an entire second series of vaccinations, the associate is considered a non-responder and a signed *Hepatitis B Waiver-Non-responder form* will be required. A note will be made in the associate's health compliance account regarding non-responder status and receipt of the form;
 - If record of the initial series of Hepatitis B vaccination is unobtainable, and the titer indicates immunity, the associate will be informed that the CDC indicates long term immunity cannot be confirmed on the basis of a positive titer alone and the associate will be encouraged to receive a complete vaccination series. If the associate chooses not to obtain additional vaccines, a signed *Hepatitis B Waiver-Lack of Vaccine Documentation with Positive Titer form* will be required. A note shall be made in the associate's health compliance account regarding the effort to obtain the record, the result of titer indicating immunity, and receipt of the form;
- Varicella (Chicken Pox)
 - Documented two vaccinations **OR** confirmed disease by medical provider **OR** titer results indicating immunity;
 - If vaccination documents are not available and/or titer is negative, vaccination/revaccination is required;
- Influenza (Flu)
 - Annual influenza vaccination;
 - Additional strain influenza, if applicable, and available;
- Meningococcal
 - One adult Meningococcal vaccination and a booster dose every five years for associates who are routinely exposed to isolates of *Neisseria meningitidis*;
- Hepatitis A (if required by placement site)
 - Two doses of Hepatitis A vaccine

C. Refusal to Consent to Vaccination

It is the right of associates to refuse vaccinations. In such cases, a *Refusal to Consent to Vaccination Form* will be provided to the associate by the Health Compliance Officer, and must be signed by the associate. The associate will be informed that declination of vaccines may result in an inability to participate in placement activities which may affect an associate's eligibility for program completion.

Refusal to consent to vaccination is subject to the usual notification process regarding non-compliance status.

D. Tuberculosis (TB) Screening and Testing

For associates entering the annual TB testing program who have not completed a TB test in the past 12 months, initial TB screening and testing will be validated by:

- Completion of a *Tuberculosis (TB) Risk Assessment and Symptom Screening* questionnaire (to be completed annually, thereafter)

AND

- ONE of the following methods of initial TB testing:
 - Two (2) Mantoux TB Skin Tests (2-step TB testing)
 - Documentation of two separate TB skin tests, each read within 48-72 hours of being placed. The two TB skin tests must be placed at least 7 days apart, and no greater than 12 months apart, to be considered 2-step baseline testing.
 - If both tests meet the above criteria and are each documented "negative," the associate should be classified as having a "negative baseline 2-step TB skin test" result.
 - An associate can then follow up with an annual single TB skin test and/or completion of a *Tuberculosis (TB) Risk Assessment and Symptom Screening* questionnaire, as determined by program.
 - If annual TB testing requirement is not completed within 14 months of the previous TB test, it cannot be considered a consecutive annual test, and 2-step TB skin testing will need to be repeated.
 - If a TB skin test is documented "positive," further medical evaluation including a radiology report (chest x-ray) is required prior to the start of any placement
 - One (1) Interferon-Gamma Release Assay (IGRA) TB Blood Test
 - Documentation of lab report for one of the following types of IGRA TB Blood Test: T-Spot or QuantiFERON Gold. One of these TB blood tests may be completed instead of 2-step TB skin testing.
 - If an IGRA TB blood test lab report is documented as "negative," the associate should be classified as having a "negative baseline TB blood test" result.
 - An associate can then follow up with an annual single TB test and/or completion of a *Tuberculosis (TB) Risk Assessment and Symptom Screening* questionnaire, as determined by program
 - A "positive" IGRA means that the associate has been infected and an additional medical evaluation is required prior to the start of any placement to determine if the disease is latent or active
 - For individuals who have received the Bacillus Calmette-Guerin (BCG) vaccine, an IGRA is the preferred testing method as it is less likely to give a false-positive result
 - If initial TB testing is performed by IGRA TB blood test, it is recommended that

subsequent annual testing be completed by IGRA TB blood test as well

If history of a positive TB test, submission of the positive TB test document if available, a *Tuberculosis (TB) Risk Assessment and Symptom Screening* questionnaire, and a radiology report showing a negative chest x-ray dated any time after the positive TB test, are required.

GVSU prohibits associates from interpreting their own TB testing results or from asking faculty to make this determination.

E. Observation

An observational experience is one where a student follows a professional with the objective of learning about a specific career. A student participating in an observational experience is not expected to have hands-on contact with a patient/client. Students participating in observation at GVSU, or with an outside entity who has not specified health compliance requirements, will be required to submit documentation of the following:

- 2 MMR
- 2 Varicella
- 1 Tdap after age 10; and a current tetanus (Td or Tdap) vaccine within the last 10 years
- Two (2) Mantoux TB Skin Tests (2-step TB testing) or One (1) Interferon-Gamma Release Assay (IGRA) TB Blood Test, **AND** a *Tuberculosis (TB) Risk Assessment and Symptom Screening* questionnaire; all with “negative” results
- Current influenza vaccination if experience occurs at any time between October–April
- Completion of training modules for Bloodborne Pathogens, FERPA, HIPAA and TB & Infection Control.

F. Cardiopulmonary Resuscitation (CPR) Certification

CPR certification is specific to program accreditation requirements. Certification must remain valid. ACLS does not fulfill the requirement for CPR certification. Courses that are entirely online are not acceptable for initial or renewal CPR certification. Hybrid CPR courses (where the didactic portion of the course is completed online and the skills evaluation is completed with a certified instructor) are acceptable.

G. Advanced Cardiovascular Life Support (ACLS) Certification

ACLS certification is specific to program accreditation requirements. Certification must remain valid. Online initial or renewal ACLS certification courses are not acceptable sources for certification.

H. Criminal Background Check

Upon matriculation hire, or as identified by program, Affiliation Agreement, or affiliated organization request, a criminal background check, which minimally includes the following elements, is performed: Residency History (seven (7) years), Michigan Statewide Criminal Records (ICHAT), National Sexual Offender Index, and National Healthcare Fraud and Abuse (OIG) Scan. Some affiliated organizations may require additional elements. GVSU will only accept criminal background checks completed through a GVSU designated vendor. Directions to complete a criminal background check are available to the associate through their health compliance account.

Criminal background check results are reviewed by the Health Compliance Officer. If deemed necessary, the Health Compliance Officer will notify the designated Program Coordinator for students or volunteers, and will notify the Dean of the College for faculty or staff. The discovery of a criminal record will not necessarily result in the revocation of an acceptance offer or expulsion from a program

of study. Convicted offenses that are subject to the rules of the State Mandatory Exclusion Regulations may result in the loss of placement opportunities at affiliated organizations. As placements may be a required component of the curriculum, the loss of training opportunities may affect a student's ability to meet requirements for graduation. Convicted offenses may also result in a student's inability to sit for professional licensure exams.

Associates have the right to review the criminal background check reports for accuracy by contacting the judicial institution or background check vendor.

The Program Coordinator 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 associates are required to notify the Health Compliance Officer of any convictions, arrests, charges, or investigations by any law enforcement authorities that occur after the initial criminal background check is completed. The Dean of the College and/or their designee will be notified by the Health Compliance Officer if known additional criminal investigations occur.

Subsequent criminal background checks may be required.

I. Drug Screen

Upon matriculation hire, or as identified by program, Affiliation Agreement, or affiliated organization request, a drug screen shall be performed. The GVSU standard is a 10-panel urine drug screen, however some affiliated organizations may require additional tests. GVSU will only accept drug testing completed through a GVSU designated vendor. Directions to complete a drug screen are available to the associate through their health compliance account.

Non-negative drug screen results are reviewed by the designated vendor's Medical Review Officer (MRO). For non-negative results declared by the MRO, associates will be given the opportunity to repeat the drug screen within one week (at the associate's expense) for confirmation of results. For non-negative results, the Health Compliance Officer will notify the designated Program Coordinator for students or volunteers, and will notify the Dean of the College for faculty or staff.

The Program Coordinator or Dean of the College may call together the *Committee for Establishing Practice Guidelines* to assist in determining the course of action if needed.

Subsequent drug screens may be required.

J. Fingerprinting

Upon matriculation, hire, or as identified by program, Affiliation Agreement, or affiliated organization request, fingerprinting shall be performed. Fingerprinting reports must be obtained through a designated Live Scan vendor. Directions to complete fingerprinting are available to associates through their health compliance account.

Fingerprinting reports will be reviewed by the Health Compliance Officer. The Health Compliance Officer will notify the designated Program Coordinator for students or volunteers, and will notify the Dean of the College for faculty or staff, if convictions found by either the Michigan State Police or FBI deem the associate unsuitable for placement at organizations affiliated with GVSU as outlined by State law, in addition to, all Tier I, Tier II and Tier III sexual offenses. GVSU may not disseminate fingerprinting results to anyone per federal and State of Michigan law.

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.

Subsequent fingerprinting may be required.

K. Bloodborne Pathogens Training

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

L. Health Insurance Portability and Accountability Act (HIPAA) Training

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

M. Tuberculosis (TB) and Infection Control Training

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

N. Family Educational Rights & Privacy Act (FERPA) Training

To be completed online upon initial entry to health compliance through the Blackboard Health Compliance site, with a score of 80% or greater to pass.

O. Elder Justice Act of 2009 Training

To be completed online upon initial entry to health compliance through the Blackboard Health Compliance site, with a score of 80% or greater to pass.

P. Intellectual Property Training

To be completed online upon initial entry to health compliance through the Blackboard Health Compliance site, with a score of 80% or greater to pass.

Q. Current and Unrestricted Professional License (if applicable)

Licensed associates are financially responsible to maintain a current unrestricted license to practice throughout their tenure with the university. A copy of the current license must be submitted to the associate's Health Compliance account.

R. Respiratory FIT testing

Respiratory FIT testing will be completed as required by the specific program. Directions available by contacting the Health Compliance Officer.

S. Color Blind Testing

Color Blind Testing will be completed as required by the specific program. Directions available through the associate's health compliance account.

T. Authorization to Release Information

All associates must review and submit the *Authorization Release Information* form. This form is available through the associate's health compliance account.

U. Health Insurance Acknowledgment Form

All associates must review and submit the *Health Insurance Acknowledgment* form. This form is available through the associate's health compliance account.

V. Simulation Center User Agreement and Photo Release

All students whose program includes the use of the GVSU Simulation Center, will be required to review and submit the *Simulation Center User Agreement* and *Simulation Center Photo Release* forms available through the associate's health compliance account.

W. Renewable Compliance Requirements

The following are to be renewed prior to due date indicated within the associate's health compliance account.

a. Annually:

- TB screening (completion of *Tuberculosis (TB) Risk Assessment and Symptom Screening* questionnaire) and/or subsequent TB testing, as required by program or as indicated due to prior positive TB test
- Influenza vaccination
 - Additional strain influenza vaccination if applicable and available
- Training modules for Bloodborne Pathogens, HIPAA, and TB & Infection Control

b. Variable Timeframe:

- Tetanus (Td or Tdap)
- CPR certification
- ACLS certification
- Respiratory FIT testing
- Professional licensure (if applicable)

X. Resources

Unless otherwise stated in this Policy, associates may obtain health compliance requirements with a healthcare provider of choice. References for additional healthcare and service providers are located through the associate's Health Compliance Blackboard account.

References:

Centers for Disease Control and Prevention. Recommended Vaccines for Healthcare Workers. <http://www.cdc.gov/vaccines/adults/rec-vac/hcw.html>. Reviewed January 28, 2020

Centers for Disease Control and Prevention. Diagnosis of Latent TB Infection. <http://www.cdc.gov/tb/publications/ltbi/diagnosis.htm>. Reviewed January 28, 2020

Centers for Disease Control and Prevention, Tuberculosis, Testing and Diagnosis, <https://www.cdc.gov/tb/topic/testing>. Reviewed January 28, 2020

Centers for Disease Control and Prevention, Havers FP, Moro PL, Hunter P, Hariri S, Bernstein H. Use of Tetanus Toxoid, Reduced Diphtheria Toxoid, and Acellular Pertussis Vaccines: Updated Recommendations of the Advisory Committee on Immunization Practices — United States, 2019. *MMWR Morb Mortal Wkly Rep* 2020; 69:77–83. DOI: [http://dx.doi.org/10.15585/mmwr.mm6903a5external icon](http://dx.doi.org/10.15585/mmwr.mm6903a5external%20icon); <https://www.cdc.gov/mmwr/volumes/69/wr/mm6903a5.htm>. Reviewed January 28, 2020