POLICY: MLS Program Student Compliance Requirements

PURPOSE
This policy adheres to all new and current learners admitted to the Medical Laboratory Sciences (MLS) Program at the University of Minnesota.

Compliance with this policy and completion of the stated requirements is for the safety of patients, learners, faculty and staff. Academic Health Sciences Affiliation Agreements between training sites (affiliates) and the University of Minnesota outline legal requirements in every Affiliation Agreement. In addition to the Academic Health Sciences (AHS) and Medical Laboratory Sciences Program requirements, training sites (affiliates) may have additional compliance requirements outlined in the affiliation agreement (contract) that will be communicated with students assigned to those clinical experience sites.

POLICY STATEMENT
In accordance with the University of Minnesota Health Sciences and Medical Laboratory Sciences Program Policies, all MLS program students must complete and adhere to the compliance requirements. These compliance requirements must be completed by all students upon admission to the MLS Program and current students must maintain compliance until their completion of the MLS program.

MLS program students are required to obtain and provide documentation for all necessary compliance requirements. Failure to remain in compliance with these requirements will result in MLS program-specific consequences which may include registration holds, delays in progression, or removal from clinical experience training sites, etc. It is the student’s responsibility to ensure compliance requirements are up to date and valid for the duration of their time in the MLS program.

MLS Program compliance requirements students must complete, submit, and maintain documentation for include:

- Criminal Background Study
- Vaccination and Immunizations
- Baseline Tuberculosis (TB) Testing
- Required Training Modules
- Health Insurance Coverage
- Driver’s License
- Student Authorization for photography, recording, and interviewing Form
- Student Information including Emergency Contact Information
Additionally, all MLS Program students must adhere to and consistently meet expectations for the Technical Standards, including the affective domain and professional skills.

Exxat Approve will verify MLS student completion of compliance requirements through Exxat for all new MLS students upon admission to MLS Program. The MLS Clinical Team will verify completion for students through Exxat and University compliance dashboards during pre-semester checks, annual checks, pre-clinical checks, and as needed for situations such as out of progression students. Exxat Approve will communicate with new students during the initial check regarding issues related to student completion of the MLS Program compliance requirements, while the MLS Clinical Team will communicate with students for all subsequent checks as previously mentioned.

PROCEDURE: MLS Program Student Compliance Requirements

This procedure provides instructions for students: (1) newly admitted to the MLS Program, and for (2) current (progressing) students in the MLS Program. Additionally, this procedure provides information regarding the student expectations to maintain, respond to, and resolve compliance issues to prevent registration holds, removal from clinical training sites, or delays in progression of the MLS program.

Newly Admitted (including re-admitted) MLS Student Compliance Requirements Procedure:

1. Receive invitation to Exxat Portal and login: Upon admission to the MLS Program, students will be added to the compliance and clinical management system called Exxat and will receive an invitation via email to their umn.edu email address.

2. Complete your Exxat Student Profile: Students must include their current/permanent address, phone #, school email, alternate/non-UMN email, emergency contact(s), upload an appropriate picture of themselves (headshot), and complete the electronic signature (See: Video tutorial for Exxat student profile).

3. Complete and upload required documentation that shows your first and last name, completion/administered date, and relevant provider (clinic, pharmacy, program, training hub, etc.) for each MLS program compliance requirement in Exxat under “Required documents” including:

   a. Complete all required Vaccination and Immunizations (or proof of immunity) as listed in the AHS policy (may be helpful to look at the Boynton form for detailed information) including:
i. TB Surveillance (either a Quantiferon Gold/T-SPOT blood test or two-step skin test). Two-step skin test must be at least 1 week and no more than 12 months apart. If Two-Step TST was completed more than 12 months ago, the student must also have an Annual TST (must have a baseline Two-Step TST prior to annual TST). If results show a positive TB test, there needs to be evidence of a normal chest x-ray dated after the TB test. If students admitted completed TB surveillance prior to admission, completion date must be within 6 months of date of admission. Students may be required to complete the annual TB testing process prior to starting the clinical semester due to clinical site-specific requirements that still mandate an annual TB.

ii. MMR (2 doses for each measles, mumps, and rubella OR positive titer for each)

iii. Varicella (2 doses after 12 months of age with 4 weeks between each dose OR positive titer)

iv. Tdap (document of 1 dose received July 2005 or later AND either Td or Tdap every 10 years)

v. Hepatitis B series (3 doses of Engerix, Recombivaxx, or Twinrix vaccine OR 2 doses of Heplisav-B given at appropriate intervals OR positive hepatitis B surface antibody titer)

b. COVID-19 vaccination documentation: Students must provide proof of vaccination or submit a religious or medical exemption from the vaccination requirement using the “COVID-19 Vaccination Medical Exemption Request” and “COVID-19 Vaccination Religious Exemption Request” forms found in Exxat under the COVID-19 requirement item (booster doses may be required by clinical experience sites).

c. Criminal Background study clearance letter (background check will be initiated upon admission to the MLS program).

d. Health Insurance Card: Students must upload a photo of the front and back of their current/valid health insurance card annually to Exxat. If there’s an update or change to the student’s health insurance plan at any time, an updated card must be uploaded to Exxat.

e. Required Training Hub Transcript that lists completed trainings of:
   i. Bloodborne pathogens training (UHS110)
   ii. Information Security Awareness training (ISA101)
   iii. Chemical Safety Training (UHS650)
   iv. HIPAA Training (HIP019)
   v. Biological Safety in the Laboratory (UHS122)
   vi. Introduction to Research Safety (UHS656)
vii. Chemical Waste Management (UHS625)

viii. All of these training modules will be assigned by CAHP student services compliance and must be completed upon admission to the MLS program. Students must complete the training prior to taking the Laboratory Methods course (MLSP 5311) before they are formally admitted to the MLS Program. The Bloodborne pathogens training will need to be repeated annually and the spring prior to the clinical experience semester due to affiliation agreement requirements. The HIPAA training must also be repeated annually.

f. Student Authorization for photography, recording, and interviewing Form: Students must physically or electronically sign the form and then upload to Exxat. Typed signatures on the form are not acceptable.

g. Current Flu shot documentation (required by October 1st each year).
NOTE: The flu shot for the current academic year may not be available when new students are admitted to the MLS Program. CAHP student services (cahpcompliance@umn.edu) will communicate with new and current MLS students when the flu shot becomes available, along with the available dates/information regarding on-campus flu shot clinics.

4. Submit required immunizations and vaccinations documentation/records to Boynton (in addition to uploading to Exxat) in one of the following ways:
   a. Email your immunization and vaccination records to Boynton at immunizations@umn.edu
   b. Upload your immunization and vaccination records to your Boynton patient portal (all UMN students have access): https://myboynton.bhs.umn.edu/.
   c. Have your healthcare provider complete the AHS immunization form and submit to Boynton via email (immunizations@umn.edu) or fax 612-626-9768.

Current/Progressing MLS Student Compliance Requirements Procedure:
This procedure is for all MLS students after they have had their required compliance documentation verified following admission and on onboarding to the MLS Program. The MLS Clinical Team will continue to monitor compliance to ensure students are up-to-date on all requirements throughout student progression in the MLS Program. Failure to comply with the compliance procedure may result in registration holds, removal from clinical training sites, or delays in program progression.

Note: This list does not include all Initial requirements, which should have been completed satisfactorily and already verified by Exxat Approve.
1. Complete and upload required documentation that shows your first and last name, completion/administered date, and relevant provider (clinic, pharmacy, program, training hub, etc.) for each MLS program compliance requirement in Exxat under “Required documents” including:
   a. Complete all required Vaccination and Immunizations (or proof of immunity) as listed in the AHS policy (may be helpful to look at the Boynton form for detailed information) including:
      i. Tdap (document of 1 dose received July 2005 or later AND either Td or Tdap every 10 years)
      ii. Hepatitis B series (3 doses of Engerix, Recombivaxx, or Twinrix vaccine OR 2 doses of Heplisav-B given at appropriate intervals OR positive hepatitis B surface antibody titer) - may continue to be monitored if students did not complete the series before admission to the MLS program.
   b. COVID-19 vaccination documentation: Students must provide proof of vaccination or submit a religious or medical exemption using the “COVID-19 Vaccination Medical Exemption Request” and “COVID-19 Vaccination Religious Exemption Request” forms found in Exxat under the COVID-19 requirement item (booster doses may be required by clinical experience sites).
   c. Health Insurance Card: Students must upload a photo of the front and back of their current/valid health insurance card annually to Exxat. If there's an update or change to the student's health insurance plan at any time, an updated card must be uploaded to Exxat.
   d. Training Hub Transcript showing recently completed training modules including:
      i. Bloodborne pathogens training (UHS110) - repeat annually and the spring semester before your scheduled clinical experience semester.
   e. Current Flu shot documentation (required by October 1st each year). NOTE: The flu shot for the current academic year may not be available when new students are admitted to the MLS Program. CAHP student services (cahpcompliance@umn.edu) will communicate with new and current MLS students when the flu shot becomes available, along with the available dates/information regarding on-campus flu shot clinics.

2. Submit required immunizations and vaccinations documentation/records, including updates, to Boynton (in addition to uploading to Exxat) in one of the following ways:
   a. Email your immunization and vaccination records to Boynton at immunizations@umn.edu
b. Upload your immunization and vaccination records to your Boynton patient portal (all UMN students have access): https://myboynton.bhs.umn.edu/.
c. Have your healthcare provider complete the AHS immunization form and submit to Boynton via email (immunizations@umn.edu) or fax 612-626-9768.


4. Clinical experience semester and clinical site-specific compliance requirements will be communicated to students by the Clinical Education Director and/or Clinical Placement Coordinator during the spring semester prior to their assigned clinical experience semester (i.e. during the year 4 spring semester of their graduation year).

Student Expectations to Maintain, Respond to, and Resolve Compliance Issues

It is a student’s responsibility to maintain compliance from the time of admission to the MLS program until graduation/completion of the MLS program. Per the MLS Program Student Handbook, MLS students are expected to read their umn.edu emails every day and respond appropriately and as needed.

1. Students will be given a deadline, typically in 2-4 weeks depending on the month of admission, to complete compliance requirements upon admission to the MLS program.
2. If a student falls out of compliance at any point during the MLS program, The MLS Clinical Team will alert them via Exxat about any disapproved or expired documents that have been uploaded to Exxat.
3. If a student is appearing to be non-compliant, staff should make sure to verify if the student is “active” or on LOA.
4. Students must respond to any emails from cahpcompliance@umn.edu or communications from Exxat received via email in a timeline manner within 24-48 hours.
5. When a student falls out of compliance, they will receive a 1 week deadline to complete or resolve the compliance issue(s).
6. Failure to complete and/or resolve the compliance issue within the 1 week deadline will result in notification to the MLS Program director and Clinical Education Director. Additionally, the student may then have a registration hold, be removed from a clinical experience site, and/or experience a delay in MLS Program progression.
7. Student questions regarding MLS Program and AHS compliance requirements should be directed to the Student Services team via email at cahpcompliance@umn.edu.
a. The MLS Clinical Team is unable to view details of the specific immunization(s)/vaccination(s) that fall out of compliance due to HIPAA and can only see that a student is “non-compliant”.

i. For questions regarding specific immunizations and/or vaccination requirements that have fallen out of compliance, students should refer to their Boynton patient portal for the details of what needs to be resolved and/or contact Boynton health services to speak with a nurse or representative.

Resources/Related Policies:

- MLS Program Non-Academic Requirements https://www.alliedhealth.umn.edu/mls/how-to-apply/non-academic-requirements
- MLS Program Current Students Compliance https://www.alliedhealth.umn.edu/mls/current-students/compliance
- MLS Program Student Handbooks https://www.alliedhealth.umn.edu/mls/current-students/handbooks-forms
- Vaccination and Immunization Requirements for Learners in Health Sciences https://drive.google.com/file/d/1uPfn_sEXTy0NH68GEOaYB_mqMN5aSPwj/view
- Health Insurance Requirement for Health Sciences Students https://drive.google.com/file/d/1uwjO4w0b2-xidGDntLJx27bSvh3HM0Q_/view
Appendix: Compliance Onboarding Checklist for the New MLS Student

MLS students are required to complete the compliance items listed below and maintain compliance throughout program enrollment. Questions or concerns regarding compliance should be directed to cahpcompliance@umn.edu.

Tips:
- Students are encouraged to upload their completed Academic Health Sciences (AHS) Tuberculosis & Immunization Form when reporting vaccination status in Exxat for the following items: TB Surveillance, MMR, Varicella, Tdap, and Hepatitis B. This form must be completed and signed by your healthcare provider and submitted to both the University (via email at immunizations@umn.edu) AND to Exxat under “Required Documents.”
- If you are choosing not to upload the AHS immunization form, your vaccination/immunization records needs to include student’s first and last name, type of vaccination, date vaccination was administered and provider information (i.e. practitioner name, and/or clinic name, pharmacy name, etc.). All scans or photos need to be clear and legible.
- The immunization record from Boynton Health’s patient portal is also acceptable when reporting vaccination status in Exxat. Please upload the full immunization record that shows your full name and dates of administration and not just the first page that lists compliance status.
- This checklist may also be used by students that are re-admitted to the MLS program or are returning from a Leave of Absence (LOA).

Resources:
- MLS Compliance Policy & Student Procedure
- AHS Insurance Policy: Health Insurance Requirement for Health Sciences Students
- AHS Vaccination/Immunization Policy: Vaccination and Immunization Requirement for Learners in the Health Sciences
- Exxat video: Orientation to My Profile
- Training Hub Required Training Modules: Training Hub
- University-sponsored Student Health Benefit Plan Waiver
- MLS Handbooks & Forms
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<tr>
<th>Compliance Requirement</th>
<th>Frequency</th>
<th>Where to Submit/Report</th>
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<td><strong>EXXAT STUDENT PROFILE:</strong> Complete your Exxat “My Profile”. Access how-to video for assistance. Profile must have the following information/sections completed: - Headshot photo (shoulders and up – must clearly see your face) - Basic Information (you must include your phone number, UMN email address, personal/non-UMN email address, preferred pronouns, and your middle name initial) - Student Current &amp; Mailing Address - Emergency Contact(s) - Review &amp; Sign electronic signature</td>
<td>Once - prior to first day of program. As Needed - Update your Exxat student profile as needed throughout program enrollment.</td>
<td>□ Exxat My Profile</td>
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| **IMMUNIZATIONS/VACCINATIONS & TB TESTING:** Complete and submit documentation for all required immunizations for Academic Health Sciences Students including TB testing, MMR, Varicella, Tdap, and the Hepatitis B series. All documentation must show your first and last name, clinic/healthcare provider name, and the date(s) of administration/completion. Refer to the Academic Health Sciences (AHS) Tuberculosis & Immunization Form for detailed information about these requirements. | Once - prior to first day of program. As Needed - Update immunizations/vaccination when they expire to maintain compliance during program enrollment. | □ Submit the completed AHS form signed by your healthcare provider OR your immunization/vaccination records to the University of Minnesota Compliance Tracking office via email at immunizations@umn.edu □ Exxat Required Documents Upload the completed AHS form signed by your healthcare provider OR your immunization/vaccination records for each of the following items in Exxat: TB Surveillance, MMR, Varicella, Tdap, and Hepatitis B. |

<p>| <strong>UNIVERSITY REQUIRED BACKGROUND CHECK:</strong> Minnesota Department of Human Services background study. U of M-Med Laboratory Sciences (900916) must be the entity requesting the study. Note: Students may need to complete additional background studies depending on their assigned clinical site(s). | Once - background study process completed by first day of program. | □ Exxat Required Documents Upload a copy of your clearance letter. |</p>
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<td><strong>HEALTH INSURANCE CARD:</strong></td>
<td>Once – prior to first day of program and as needed for any changes in insurance or new cards.</td>
<td>□ Exxat Required Documents</td>
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<td>Students must upload proof of active/current health insurance. Upload front and back copy of current health insurance card. Note: If there is an update or change to the student's health insurance plan at any time, an updated card must be uploaded to Exxat.</td>
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<td>Upload a copy of the front and back of your current insurance card.</td>
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<td><strong>TRAINING HUB MODULES:</strong></td>
<td>Bloodborne Pathogens course should be completed prior to first day of program, and is repeated each year and spring semester before clinicals. HIPAA course must also be completed prior to first day of program and repeated annually.</td>
<td>□ Exxat Required Documents</td>
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<td>Complete and upload Completed Training Transcript for the following Training Hub modules:</td>
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<td>Upload your Training Hub completed training transcript.</td>
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<td>● HIPAA Training (HIP019)</td>
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<td>● Bloodborne Pathogens Annual OSHA Requirement (UHS110)</td>
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<td>● Information Security Awareness Training (ISA101)</td>
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<td><strong>COVID-19 PROOF OF VACCINATION OR EXEMPTION:</strong></td>
<td>Once - prior to first day of program.</td>
<td>□ “Report a Vaccination or Exemption” form on the My Info tab in MyU</td>
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<td>Students must provide proof of vaccination or submit a religious or medical exemption from the vaccination requirement to the “Report a Vaccination or Exemption” form on the My Info tab in MyU. Booster doses are not required at this time, but may be required by certain clinical experience sites. Note: Some clinical rotation sites may not allow medical or religious exemptions for the COVID-19 vaccination.</td>
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<td>□ Exxat Required Documents Upload record of COVID-19 vaccination.</td>
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<td><strong>INFLUENZA VACCINATION:</strong></td>
<td>Annually - after August 1st, but no later than October 1st.</td>
<td>□ Complete AHS Self-reporting Form</td>
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<td>Receive the flu shot annually after Aug. 1st and before Oct. 1st, then upload documentation</td>
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<td>□ Exxat Required Documents Upload record of influenza vaccination annually.</td>
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<td><strong>Student Authorization for Photography, Recording, or Interviewing Form</strong></td>
<td>Once - prior to first day of program.</td>
<td>□ Exxat Required Documents Upload signed form. See note under “compliance requirement” regarding types of acceptable signatures.</td>
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