

# COMPLIANCE

## HIPAA/Protected Health Information

### The Patient Record

Accurate and complete documentation of your patient interactions is an integral and critical part of the student's training. The electronic record and any handwritten documents are legal documents; they afford protection to the student, the patient, the faculty, and the College should any questions arise about treatment of or interaction with a patient. The patient record contains all pertinent information regarding the patient's medical, dental, emotional, and behavioral background that might impact the type/extent of treatment rendered. Without such information, the possibility of providing inappropriate care is increased. It is also the primary source of information for decisions about the patient's status in the program. Releases, reassignments, transfers, or referrals cannot be made or defended without sufficient documentation. Proper records and information management is also important for monitoring treatment sequencing, facilitating departmental interaction in the treatment decision-making process, and providing accurate data to those to whom patient referrals are made.

### Academics and Safeguarding PHI

- PHI in the Classroom
  - Remove all patient identifiers from materials **or**
  - Obtain patient authorization to use PHI (Authorization for Release/Use of Protected Health Information) **or**
  - Use commercially-available slides
  - Do not take photos of instructors' Power Point presentations
- Students are responsible for the PHI they create, collect, store, and send
  - Photos: Do not take photos of patients using your cell phone
  - Flash drives: **must** be encrypted prior to being utilized for storing any PHI (including photos and x-rays)
  - Portable Computing Devices (e.g., laptops, smart phones, tablets, flash drives) and Desktops: Workforce members must use extreme caution when using Portable Computing Devices and desktop computers to store PHI. PHI should not be stored on Portable Computing Devices and desktop computers unless absolutely necessary; it should be stored on servers in a secure enterprise data center. Workforce members must follow the COD's Administrative, Physical, and Technical Procedures for Accessing PHI on Portable Computing Devices. If PHI is stored on such devices or computers, the device or computer must be encrypted pursuant to HIPAA Security policies and applicable University policies. Portable Computing Devices must never be left unattended in unsecured places. The failure to take the above security precautions will be considered a violation of these Policies, subjecting the user to sanctions.
  - Personal Cell Phones: COD students are encouraged to contact patients by utilizing a phone located within the COD (see 5.2.5.1 COD Phones for Student Use). Calling a patient from your personal cell phone constitutes utilizing the phone for university business. Cell phones must be enrolled in Secure Mobile.
    - Patient contact numbers are considered PHI and must be kept secure.
- The University and/or the individual who breach HIPAA can be held liable

- Student clinic suspension may be imposed
- Fines may be imposed against the University and individuals
- Individuals may be imprisoned for up to 10 years
- *Resource:*
  - <http://www.ouhsc.edu/hipaa> (<http://www.ouhsc.edu/hipaa/>)

### Physical Records Security and Privacy

Paper records and any printed radiographic images are also the property of the College and should be secured at all times. **Under no circumstances is any PHI to be removed from the building.** If it has been determined that a student has removed or disclosed any patient information or supporting materials (e.g. lab work) from the building, the student is subject to losing his/her clinic privileges for a period of no less than three (3) weeks.

Examples of PHI include: patient names, phone numbers, written notes, photos, treatment plan worksheets, models and grade/evaluation forms. PHI may not be left unattended on the counters or other areas. Documents printed from the electronic health record (EHR) must be placed in a locked shred bin for destruction.

### Contacting Patient by Phone or Electronic Devices Policy

The University of Oklahoma College of Dentistry will take all necessary steps to protect and safeguard patients' Protected Health information (PHI). This policy is intended to provide direction to the College of Dentistry (COD) faculty, staff and students in regard to the protection of PHI when communicating by phone and/or other electronic devices.

1. For Appointment Confirmation –
  - a. *Speaking Directly to Patient* – You may provide detailed information about the appointment; i.e. time, place, provider and procedure.
  - b. *Leaving a Message* – Identify only that you are calling from the COD and provide a return number for confirmation. **Do not** leave detailed information about the appointment.
  - c. *Confirmation via Text or E-Mail* – The patient must have a signed Consent for Electronic (text, e-mail) Communication in the electronic health record (EHR) before this method of contact can be used.
2. Obtain or Review Health/Dental Histories –

It is the University's policy that faculty, staff, and students shall not review documents containing PHI from the COD's premises for their own convenience. Printing portions of the PHI is acceptable only if the documents containing PHI are stored or filed in such a way as to avoid access by unauthorized persons and do not leave the COD. Photographs of any portion of the patient's record are prohibited.

1. Faculty, Staff, and Students Reviewing Health Histories **via** Phone
  - Telephone conversations must be conducted away from public areas if possible and voices should be quiet. Speakerphones may not be used. Ideally, conversations should take place during regular business hours. The information collected must be directly entered into the EHR (axiUm) and not recorded on paper or any portable computer devices; i.e. Word, Notes. If it is necessary to contact a patient after business hours and off campus, then only questions about the patient's health that could be a consideration for treatment can be asked; i.e. have you had a heart attack or stroke in the last six months, have you had any surgeries, been diagnosed with a disease or condition that may require special needs, etc.

2. PHI via E-mail – Transmitting PHI via e-mail outside the University email address system for treatment, payment, or health care operations is prohibited unless the message is encrypted between sender and recipient in a manner that complies with HIPAA and the Emailing and Transmitting PHI policy or the patient has signed the Consent for Electronic Communication. Secure options include e-mailing through a secure patient portal or by typing **[secure]** in the subject line before the subject. Sending e-mails that contain PHI for treatment, payment, or health care operations between ouhsc.edu/ou.edu and oumedicine.com/ouhealth.com e-mail addresses is secure and acceptable as long as the recipient is authorized to receive the PHI.

## Policy for Models

**Patient models are considered Protected Health Information (PHI). HIPAA and University policy require that reasonable steps are taken to protect PHI from unauthorized access. When not in use, models must be secured in locking desks, file cabinets, drawers, lockers, or cabinets.**

The Oklahoma Board of Dentistry no longer requires diagnostic study casts or models obtained for removable or fixed prostheses to be retained as part of the patient record. Therefore, the college is not obligated to maintain the models once the patient has been released or treatment is complete. Once the treatment is complete or the patient is released, follow the destruction process below.

- Study and removable prostheses models:
  1. Patient **must** be released from the student program
  2. Some models are kept for teaching purposes; check with the supervising faculty before moving on to the next steps
  3. If the patient's information is on the plastic mounting piece, remove PHI with a stone grinder or redact with a permanent marker
  4. With the stone grinder, remove/alter the occlusal surfaces from any teeth present. If teeth are not present, the alveolar ridge does not need to be altered
  5. Discard in the lab's trash can
- Fixed prostheses quadrant models or diecasts
  1. The patient can still be active in the student program
  2. Check with supervising faculty before moving on to the next steps
  3. Remove the patient's name with a stone grinder
  4. Remove or alter the occlusal surfaces with a stone grinder
  5. Discard in the lab's trash can

Keep any study and removable prostheses models of active patients with current treatment to be transferred to your vertical team upon graduation.

Utilize a permanent marker to remove any PHI from the storage box or bag after all items have been destroyed.

Do not discard numerous models into a single trash can at one time. The trash can liner could become overloaded.

## HIPAA Privacy and Security

OU College of Dentistry utilizes the OUHSC HIPAA (<https://hipaa.ouhsc.edu/>) website for compliance. The University is required to be compliant with the HIPAA Privacy and Security Regulations. The

regulations establish national standards regarding uses and disclosures of protected health information.

The purpose of this website is to provide access to the University's Privacy and Security Policies and Procedures and other helpful tools and information regarding HIPAA. The website is located at: <https://hipaa.ouhsc.edu/>.

## Training

Annual online HIPAA Privacy and Security training is required for all workforce members. Annual trainings can be accessed via the OU Enterprise Learning Management System known as OnPoint (<https://onpoint.ouhsc.edu/>). OnPoint will send email notifications to all workforce members up to 30 days before the expiration of the previous year's certificate. It is the responsibility of each workforce member to complete training in a timely manner.

## Consents and Documentation

Each patient's electronic health record must contain:

- a signed Acknowledgment of Receipt of Privacy Practices form
- a signed Authorization for Release/Use of Protected Health Information in Photograph/Videotape/Electronic Images from Dental or Medical Record for Education Training

Optional documents are:

- Authorization to Release Protected Health Information Verbally to Others
- Request and Consent for Electronic Communications (Excluding Patient Portal and Secure Email)

## Information Technology Policies, Standards, and Guidelines

### Electronic Records Security and Privacy

All electronic records are the property of the College. Every effort should be made to ensure the security and privacy of these records. All workforce members must follow HIPAA and OUHSC HIPAA policies to safeguard PHI. When a user steps away from a display containing protected health information (PHI), the screen must be secured by locking the screen or logging off. Minimizing the screen is not an acceptable method to maintain security.

References:

Safeguards - Administrative and Physical (<https://hipaa.ouhsc.edu/Portals/1412/Assets/Documents/Policies/Safeguards-AdministrativePhysical-7-22-22-final.pdf>)

Safeguards - Technical (<https://hipaa.ouhsc.edu/Portals/1412/Assets/Documents/Policies/Safeguards-Technical-7-22-22-final.pdf>)

Workstation Policy (<https://hipaa.ouhsc.edu/Portals/1412/Assets/Documents/Policies/WorkstationPolicy-7-22-22-final.pdf>)

## Encryption of Electronic Devices

Electronic devices including laptops, I-pads, tablets and cell phones must be encrypted in order to access PHI on a portable electronic device. This encryption process is established by Central Information Technology for the Health Science Center campus.

Resource: <https://itsupport.ou.edu/TDClient/30/Unified/KB/ArticleDet?ID=3016> (<https://itsupport.ou.edu/TDClient/30/Unified/KB/ArticleDet/?ID=3016>)

## College Computer Requirements Electronic Media and Copyright

Copying, storing, and/or providing transport of digital material in a manner that violates the copyright associated with the digital material on or with any University information system resources is strictly prohibited.

Resource: <https://it.ouhsc.edu/policies/documents/infosecurity/Digital%20Copyright%20Policy.pdf>

## Social Media Guidelines

- Protected Health Information shall not be posted on social media sites, such as Facebook or Twitter. University Personnel should keep in mind that even if a patient's name is not posted, if the patient could reasonably be identified, alone or with information obtained from other sources, the information is considered Protected Health Information.
- Do not post photos or x-rays of patients.
- Do not text photos or x-rays of patients.
- Sensitive or proprietary information **must not** be shared.
- Activity on social media should remain personal in use only.
- Use personal email account for registration.
- Personal social media relationships with patients, patient family member, etc. are prohibited.
- Remember that content is subject to interpretation.
- Report unprofessional content to the COD Director of Compliance.
- OUHSC email policies apply to files shared over social media
- TikTok
  - In compliance with the Governor's Executive Order 2022-33, effective immediately, no University employee or student shall access the TikTok application or website on University-owned or operated devices, including OU wired and wireless networks. As a result of the Executive Order, access to the TikTok platform will be blocked and cannot be accessed from the campus network.
- Resources:
  - <http://it.ouhsc.edu/policies/>
  - Social Media & Networking Policy and Standards (oklahoma.gov) (<https://oklahoma.gov/omes/services/information-services/is/policies-and-standards/social-media-networking-policy-and-standards.html>)

## Student Enrollment Requirements Student Requirements for Entering the Clinical Program

Students must fulfill the following requirements at acceptance into the COD program, annually, or upon expiration of each requirement. It is the responsibility of each student to maintain their requirements by keeping them up to date and by staying current with all training material.

1. Complio:
  - Students must subscribe to Complio, the immunization/enrollment requirement tracking system for the duration of their program.
2. Immunizations:
  - Hepatitis B
  - Varicella

- MMR
  - TDAP
  - Flu Vaccine
  - Covid-19
  - Tuberculin
3. Health Insurance:
    - OU Student Health Insurance Plan
    - Opt-Out Waiver
    - Needle Stick Coverage
  4. Required Annual Training:
    - HIPAA Privacy and Security
    - Hazardous Communication/General Safety
    - TB Awareness
    - Blood Borne Pathogens
    - Sooner Fire Safety
    - Title IX: Sexual Assault Prevention
  5. Additional Requirements:
    - CPR - Basic Life Saving for Healthcare Workers
    - Policy Acknowledgement Statement
    - Technology Consent and Release Agreement
    - Device Encryption Attestation
    - Criminal Background Check
    - Drug Screening
    - Medical Marijuana Policy

Students will be trained to understand their responsibility for maintaining compliance with all applicable laws and regulations. Each student will receive appropriate training for his or her role in the organization. All training materials will be developed and/or selected and approved by the COD Director of Compliance. Documentation of compliance training provided to each individual will be maintained.

## Complio

Complio is an online system that the University of Oklahoma Health Sciences Center will use to track immunization and enrollment requirements among our different HSC programs at all campus sites. Students will be required to upload their own immunization and enrollment documentation into the system, rather than providing documentation to Student Health or the COD Office of Compliance. Complio will also allow you to have access to your immunization records when you transition from an OUHSC student to a healthcare professional.

Items to remember when creating your Complio account:

- Be sure to select the correct program you are enrolled in before subscribing
- Use your OUHSC email address as your primary email address
- Use your OUHSC network password as your initial password
- Use your personal email address as a secondary email address
- Add your cell number to receive text message updates regarding your account
- List all aliases you have been known by in your student profile

Students who do not meet the immunization or enrollment requirements within Complio will have enrollment holds automatically placed on their accounts for the next enrollment period. Students must satisfy the requirements before the automatic hold will be released. Students

should review their Complio account regularly to maintain compliance and prevent any enrollment holds.

For more information regarding Complio, visit this link: <https://students.ouhsc.edu/Current-Students/Student-Wellbeing/Health-Clinic/Complio> (<https://students.ouhsc.edu/Current-Students/Student-Wellbeing/Health-Clinic/Complio/>)

### Frequently Asked Questions:

1. I tried to access Complio but was unable to log in. What should I do?
  - If this is your first time, visit <https://students.ouhsc.edu/Current-Students/Student-Wellbeing/Health-Clinic/Complio> (<https://students.ouhsc.edu/Current-Students/Student-Wellbeing/Health-Clinic/Complio/>) to Create an Account. Complio will send an email to the email address used during account creation. You must use the link sent specifically to you from Complio to set up and access your account. Always use your school email address as your primary email address and your personal email address as your secondary email address. If you have done this correctly, you will have Single Sign On activated and your Complio password will be the same as your OUHSC network password.
  - If you are a returning student, you can use your school email and password to access the system.
2. How much is Complio for the very first year I sign up?  
Subscription costs are based on the number of years you will be utilizing Complio. They are:
  - \$19 | 2-year subscription
  - \$29 | 3-year subscription
  - \$35 | 4-year subscription
  - \$45 | 5-year subscription
3. Two of my requirements were rejected; could you tell me why?  
Students can log into Complio to review the Admin's Comment History to clarify why requirements were rejected or review the email sent by Complio.
4. Who rejected my requirements in Complio?  
All requirements are reviewed by a Medical Review Officer at Complio. The Office of Compliance can review rejected items and complete an override if the requirement was met and incorrectly denied by Complio.
5. I've uploaded documents into Complio and they say "Pending Approval", did I submit my documents correctly?  
It does take several business days for all uploaded documents to be reviewed. Your Pending Approval status will be indicated by a yellow exclamation point. If it is rejected, you will log into Complio to review Admin's Comment History or the email sent by Complio to clarify why the requirement was rejected.
6. I completed my requirements and they were approved in Complio. How long will it take for my enrollment hold to be removed?  
Once approved, Complio sends an electronic notification to the Bursar's office to remove the enrollment hold. This process can take up to 48 hours (not including holidays, school breaks, or weekends) for the enrollment hold to be removed. Students failing to be enrolled before the deadline could pay late fees, have funding of student loans affected, and not be able to attend class or clinic until the enrollment hold is resolved.

## Immunizations

Every new student, either undergraduate or graduate, is required to upload all personal health history proof of immunizations into Complio to receive approval for enrollment requirements. It is the responsibility

of each student to stay current with all required immunizations while enrolled for the duration of your program. Students failing to maintain compliance with their immunizations could be removed from class or clinic until requirements are brought current.

For immunization proof to be valid, all records must contain:

- The student's name and any aliases used must be listed within the student's profile in Complio
- Full dates of vaccination; just a month and year listed will not be considered valid
- Treating facility, clinic, or provider's information who administered the vaccination or be an Official Immunization Record of the state
- Vaccination name
- Date the vaccination was administered
- English or be a certified English translation of the documentation
- The **full** record. Do **not** crop your vaccination records; upload the full document into Complio

### Frequently Asked Questions:

1. Can I use my shot records that are in another language?  
No. Any childhood immunization records in a language other than English should have a certified translation into English before they can be approved for your requirements.
2. Do I upload my Vaccine History Form for HSC Students?  
No. You do not upload the Vaccine History form into Complio. It is not necessary and not a valid record of your immunization history.

## Hepatitis B Vaccine

Students with the potential for exposure to blood or OPIMs are required to receive the Hepatitis B vaccination series, which may be obtained from the appropriate campus student health service. All applications, immunization schedules, vaccine doses, etc., should follow the Centers for Disease Control and Prevention Morbidity and Mortality Weekly Report.

Students must upload documentation of three childhood Hepatitis B vaccines **and** a positive **quantitative Hepatitis B surface antibody titer** showing immunity. Once a positive titer is provided, the requirement will be completed.

If titer results are **negative** or nonreactive, upload your result in the Initial Hepatitis B Titer requirement. Begin booster doses as directed by your PCP or Student Health. Repeat the **quantitative Hepatitis B surface antibody titer** four weeks after your last Hepatitis B booster dose. Upload a **positive** result in the Repeat Hepatitis B Titer requirement.

- Students should consult with their PCP or Student Health to determine which course of action will be best for establishing immunity - repeating a 3-dose or a 2-dose booster series.
- 3-dose series (Engerix-B or Recombivax-B):
  - Booster dose 1 will cause 1 month of **temporary** compliance.
  - Booster dose 2 will cause 5 months of **temporary** compliance.
  - Booster dose 3 will cause 1 month of **temporary** compliance until you complete your repeat **quantitative Hepatitis B surface antibody titer**.
- 2-dose series (Heplisav-B):



- Booster dose 1 or 2 of the HepHisav-B series will cause 1 month of **temporary** compliance until you complete your repeat **quantitative Hepatitis B surface antibody titer**.
- Uploading proof of booster doses will cause **temporary** compliance.

#### Frequently Asked Questions:

1. I just started my Hepatitis B booster series; how do I know that I won't be reported as non-compliant?  
Uploading documented proof of your booster doses will cause **temporary** compliance while you finish up the Hepatitis B series. As long as you are on schedule with your series, you will **not** be held from class or clinic.
2. I had my Hepatitis B titer and the results came back negative but I have already completed the 3-shot series as a child; what should I do?

Upload your negative titer results. You should talk to your healthcare provider about the best way to proceed. You can either retake the entire 3-shot series with a different brand of vaccine or take a 2-shot HepHisav-B booster. Whichever route you choose, you will still need to re-titer 4-6 weeks following the last vaccine. If your titer comes back negative or non-reactive again, then you may be considered a "non-responder" or "non-converter". Please see Ms. Graziano if this is the case.

3. I just started my Hepatitis B series; can I still go to class or clinic?  
If you have initiated a series but not completed them, you will be allowed to participate in the program as long as you are uploading your vaccination documentation into Complio. If you do not keep up with your immunization schedule, then you could be held from the program until you are compliant again.
4. I've completed my Hepatitis B vaccine and titer, what should I do next?  
If you are immune, you are finished. Complio will mark this requirement completed and it will not need to be re-visited as long as you are a student.
5. What kind of titer do I need?  
You need to get a quantitative **Hepatitis B surface antibody titer**. This will tell us if you are immune or not. An antigen titer only tells us that you may have been exposed to Hepatitis B, not if you are immune.

#### Varicella (Chicken Pox)

Students must upload documentation of two Varicella vaccines **or** a positive quantitative antibody titer to show immunity. If the titer provided is negative, students are to repeat the two-shot series. A second titer is not required.

**Note:** History of disease is not accepted.

#### Frequently Asked Questions:

1. I had Chicken Pox as a child; what should I do since I did not receive the vaccinations?  
You should ask your primary care physician or Student Health for an antibody titer to determine if you are still immune. If so, you will upload proof into Complio. If not, you will complete a 2-dose vaccination series.
2. I only had one dose of Varicella as a child; what should I do?
  - You can choose to get a second dose of Varicella as an adult and upload documentation into Complio. The duration between doses does not matter for this vaccination.
  - You can choose to complete a quantitative antibody titer. If the titer is positive, upload your documentation into Complio. If the

titer is negative, you will need to complete a second dose of the vaccination.

#### Measles, Mumps and Rubella (MMR)

Students must upload documentation of two MMR vaccines **or** three positive quantitative antibody titers to show immunity. The titers for MMR will be processed separately and proof of immunity must be uploaded separately into Complio. If the titer provided is negative, students are to repeat the two-shot series. A second titer is not required.

**Note:** If MMR vaccination is indicated separately, then proof of 2 doses of Measles and Mumps and 1 dose of Rubella vaccination is required.

#### Frequently Asked Questions:

1. I only received one MMR shot as a child. What should I do?
  - You can choose to get a second dose of MMR as an adult and upload documentation into Complio. The duration between doses does not matter for this vaccination.
  - You can choose to complete a quantitative antibody titer. If the titer is positive, upload your documentation into Complio. If the titer is negative, you will need to complete a second dose of the vaccination.

#### Tetanus, Diphtheria, & Pertussis (Tdap)

Students must upload proof of one Tdap vaccine received as an adult. If the Tdap vaccine is older than 10 years or received as a minor, documentation of a booster or an updated Tdap vaccine is required.

**Note:** Tdap vaccines received under the age of 18 are not valid.

#### Frequently Asked Questions:

1. What expiration date should I use for my TDAP?  
TDAP is 10 years from the date of the vaccination. Complio will automatically add the expiration date for you.
2. My TDAP is not expired but Complio rejected it; why?  
To fulfill this requirement, you must receive at least one TDAP as an adult (over the age of 18). If you received a TDAP as an adolescent and it has not expired yet, you will need to get another TDAP vaccination and upload that proof into Complio.

#### Influenza (Flu)

Students must provide proof of receiving an annual Flu vaccine. The flu vaccine requirement in Complio does not become available until September of each year and will remain open through March. All OUHSC students have a deadline of November 1st to upload proof into Complio. Students getting the Flu vaccine during the Spring and Summer semesters will still be required to vaccinate with current Flu vaccine that becomes available in September; **flu vaccinations administered before September will be denied by Complio**. The flu requirement expires one year after administration; therefore, the vaccination or an approved declination is required every year.

#### Frequently Asked Questions:

1. Can I opt out of the flu shot?  
Yes, see the information regarding declinations here (<https://students.ouhsc.edu/Current-Students/Student-Wellbeing/Health-Clinic/Required-Immunizations/>). You can discuss your concerns regarding the flu vaccine with Student Health since it is a requirement for all healthcare providers on the OUHSC campus. Call Student Health at 405-271-9675 to schedule an appointment to discuss this issue.

2. Since I can't take the flu shot until October, what do I do for Complio? Complio will not open this requirement until September of each year. When the requirement becomes available, you will upload vaccination information; the expiration date will be one year from the date of the vaccine administration or approved declination. During April - September, the requirement will not be available for students to add documentation.
3. I recently took my flu shot before September. Do I have to take another flu shot in October?  
Yes. The flu vaccine is created every year for the upcoming flu season which starts approximately in September. If you received a flu shot before Oklahoma's flu season started, you were likely injected with a vaccine for last year's flu. You will have to vaccinate with the current vaccine when it becomes available.

### Covid-19

Effective May 12, 2023, only a single dose of a COVID-19 vaccine is required for students enrolled in Health Sciences Center degree programs in Oklahoma City, Tulsa, and remote sites. There is no timeframe for when this dose must have been administered, so long as it was a WHO-approved COVID-19 vaccine. The COD program students are required to provide documentation showing a single dose of a COVID-19 vaccination due to patient-facing responsibilities which include any activity that is anticipated to necessitate direct contact with or close physical proximity (6 feet) to a patient.

#### Frequently Asked Questions:

1. Do I have to take a COVID-19 vaccination?  
All patient-facing faculty, staff, and students will be required to take the COVID-19 vaccination. You can decline the vaccination for medical or religious reasons by completing a declination form and submitting proof to the appropriate email address in the declination instructions found here (<https://students.ouhsc.edu/Current-Students/Student-Wellbeing/Health-Clinic/Required-Immunizations/>).
2. Where can I get the COVID-19 vaccination?  
The vaccine is available in various locations on the OU Health Sciences Center campus, in designated HSC pharmacies and clinics, as well as in the community (<https://ouhsc.edu/thecenter/covid19/Vaccines/>).

### Tuberculin Test

Students must provide documentation annually for Tuberculosis (TB). TB tests are valid for 12 months from the date they are interpreted/read. Students are responsible for ensuring their annual TB test does not expire. Students with a history of either a positive TB Skin Test or a positive TB blood test must contact Student Health for further assessment and instruction regarding TB clearance.

#### New Students

- Two 2-step PPD skin tests read 1 - 3 weeks apart **or**
  - 4 visits to PCP or Student Health
  - If PPD skin test results return positive, Student Health may require a clear chest x-ray and medical clearance before issuing a Student Clearance Letter for Complio
  - Do **not** upload x-rays or physician notes into Complio
  - Failure to complete the second PPD skin test within the 3 weeks will negate the first test and the student will be required to start the process over again.
- One negative IGRA (Quantiferon or TSPOT) TB Gold test

- 1 visit to PCP or Student Health
- This is a lab test where blood is drawn. It requires orders from a healthcare provider.

#### Returning Students

- Complete and upload the Student TB Screening Questionnaire after your 1st academic year in your current program.

**Note:** Expiration dates are one year from the date of the second PPD skin test, IGRA test, or annual questionnaire.

#### Frequently Asked Questions:

1. I was an OUCOD student last year, do I have to take two 2-step PPD skin tests?  
You will complete the Student TB Screening Annual Questionnaire form which is also available in Complio. After uploading the document, the expiration date should reflect one year from the date of the upload of the questionnaire.
2. My PPD came back positive, what do I do?  
You will be required to complete an IGRA test. If the IGRA is negative then you have satisfied your requirement. If your IGRA is positive then you will need to consult with Student Health, they will evaluate your situation before issuing medical clearance. If you are cleared, Student Health will issue a Student Clearance Letter. Do **not** upload x-rays or physician statements into Complio, only upload the Student Clearance Letter.
3. Can I decline the TB test?  
No. The requirement for TB is a TEST and not a vaccination. It will be conducted via skin or blood analysis. The declination is not valid for the TB requirement.

### Immunization Records Information

Students must upload documented proof of receiving vaccinations or titers into Complio. Students should upload the **full** record into Complio; do **not** crop vaccination or titer information. To assist with finding vaccination information:

#### Oklahoma Residents

- Immunization records may be located at the Oklahoma State Immunization Information System (OSIIS) website: <https://osiis.health.ok.gov>

#### Out of State

- Immunization records may be located at the county health department where you grew up

#### Frequently Asked Questions:

1. What if I can't find my shot record; what should I do?  
You can choose to have antibody titers drawn for all of the vaccinations that you do not have documented proof for. If the titers return positive, you will upload the titer results into Complio. If the titers return negative, you will need to complete the required number of vaccinations to satisfy the enrollment requirement.

### Vaccine Declinations

OUHSC program students can submit declinations for a required vaccination, either for a medical basis or religious reasons. Please note that a separate form is required for each vaccination being declined. The below steps outline the process for submitting a declination form for consideration:

1. Complete the Vaccine Declination Form for OUHSC & OU-Tulsa Students (<https://students.ouhsc.edu/Portals/1352a/Assets/documents/health-clinic/immunizations/vaccinationdeclination.pdf?ver=2023-01-04-154633-433>)
2. Based on your declination reason, please gather the documentation as requested on your Vaccine Declination Form.
3. Submit your completed Vaccine Declination Form *and required documentation* to the following email address, based upon your geographic campus location, using the subject line *Vaccine Declination Form*:
  - HSC-OKC and remote site learners: [requiredimmunizations@ouhsc.edu](mailto:requiredimmunizations@ouhsc.edu)
  - OU-Tulsa learners: [TulsaSA@ou.edu](mailto:TulsaSA@ou.edu)
4. Following submission, a member of the Student Affairs, Accessibility & Disability Resource Center, and/or Student Health will be in communication with you, via email or phone, to discuss your Vaccine Declination Form.
5. Students will upload the *approved* declination form into the immunization requirement for which they are declining. Declination forms without an approved signature will be denied.

**A separate Vaccine Declination Form, and supporting documentation, are required for each vaccination being declined.**

#### Frequently Asked Questions:

1. Why are vaccinations required?  
HSC program students are required to receive immunizations to protect the patients, visitors, and the health care providers they work and train with.
2. If I am unsure about the vaccine, who can I call?  
You can contact your primary care provider or Student Health to discuss the research and safety of the vaccines. The phone number is 405-271-9675.
3. How long does it take to review my documentation for a declination?  
Allow **15 business** days (not including holidays, school breaks, or weekends) for review. The requirement will be non-compliant until an approved declination or appropriate vaccination/titer proof is uploaded.
4. If my declination is approved, how will I protect my patients?  
Students will visit with their program/college student service team to understand the next steps and possible program limitations. Generally, all unvaccinated patient-facing students will be required to mask in all indoor campus facilities.
5. What happens if my declination is declined?  
Students will visit with their program/college student service team to understand the next steps and possible program limitations.
6. Will declining vaccinations be a challenge to completing my program?

The University of Oklahoma Health Sciences Center does not control the vaccination policies of the facilities, hospitals, or physician groups that provide clinical experiences for our students. If you are not allowed to participate in a particular clinical experience due to your declining vaccination, the University may not be able to find you an alternate clinical experience without fundamentally altering the program. If you are unable to complete the required clinical experiences, you will be unable to fulfill the requirements of your program, eliminating the opportunity to fulfill the requirements for graduation. In other words, although you may be able to participate in the didactic portions of the program if you decline required

vaccinations, the University cannot guarantee that you will be able to ultimately graduate from the program.

## OUHSC Student Medical Insurance Coverage

Per the University of Oklahoma Regents' Policy, all students enrolled in OU Health Sciences Center (OUHSC) programs are responsible for maintaining health insurance and providing coverage information each semester of enrollment in their programs. A student who is found to be uninsured will receive notification from HSC Student Affairs and their academic dean's office regarding lack of compliance and possible delay in the academic program, including clinical participation, and advancement.

Students have the option to either purchase an OU Student Health Insurance Plan or provide proof of comparable coverage and a waiver. Purchasing insurance or submitting a waiver must be done before the OUHSC deadline which varies every period. For more information regarding the Student Health Insurance Plan or waiver, visit <https://ouhsc.myahpcare.com/>.

**Note:** Graduating students - If you are purchasing the OU Student Health Insurance Plan for the Spring semester *consider* purchasing the plan that provides coverage until June 30th. This will ensure you have coverage beyond your hectic graduation month. Plus, if you are starting employment, you may need this coverage while you transition to your new employer's health plan.

#### Frequently Asked Questions:

1. Do I have the option to not have medical coverage?  
No. As an OUHSC student, this is an enrollment requirement to attend class and clinic. You must purchase the OU Student Health Insurance Plan or provide coverage information that you are covered on another medical plan.

## OU Student Health Insurance

Students who do not have coverage or acceptable medical coverage may purchase the OU Student Health Insurance plan. To purchase the plan, visit: <https://ouhsc.myahpcare.com/>

Students can also enroll their spouse and dependents on the plan. Rates are based on which plan you choose. Other benefits of the plan include:

- \$500 deductible, many services covered at 100%
- Needle stick coverage **is** included with the plan
- Opt-out waiver is **not** required
- ACA Compliant
- Coverage at home, school, and while traveling abroad
- BCBS participating provider network
- Multi-lingual 24/7 Nurseline
- Prescription drug coverage

#### Frequently Asked Questions:

1. If I purchase the OU Student Health Insurance Plan, do I still have to complete a waiver?  
No. You only need to submit a waiver if your insurance coverage is not through the OU Student Health Insurance Plan.
2. If I purchase the OU Student Health Insurance Plan, do I need to purchase Needle Stick coverage?  
No. Needle Stick coverage is an included perk of the OU Student Health Insurance Plan.

3. The premium is very high; can I make monthly payments?  
No. The premium amounts quoted are for the full semester and must be paid for at the time of purchase.
4. I was able to get cheaper insurance after I paid for the Student Health Insurance Plan. Will they refund me the difference?  
Unfortunately, they will not. Your coverage will stay in effect until the end of the semester and if you have other coverage, you will have primary and secondary coverage.
5. How much is the OU Student Health Insurance Plan?  
There are different coverage options and periods, but the plan is roughly \$335 per month for student coverage. For the most up-to-date information, go to: <https://ouhsc.myahpcare.com/> for the Student Health Insurance Benefit Summary.
6. I am not attending classes during the summer, which plan should I purchase?  
Your best option would be to choose the plan that covers dates from (**fall 2**) August 15 to December 31 and (**spring**) January 1 to May 31.
7. If I purchase the OU Student Health Insurance Plan, will that cover any immunizations and titers that I need for enrollment?  
The student health insurance will cover all of your vaccinations and most of the cost of the titers.
8. I received a notice to renew my OU Student Health Insurance Plan before my current plan expires. Can I renew this plan now for fall?  
Yes. You can enroll for the next semester; be sure to select the plan that expires at the end of the next semester. For example: If currently in the Summer semester, the Fall semester would end on December 31st. Pick the plan that also expires on December 31st. Coverage is effective as follows:

Sessions	Begins	Ends
Fall 1	7/1	12/31
Fall 2	8/15	12/31
Spring	1/1	5/31
Spring/Summer	1/1	6/30
Summer	6/1	6/30

### Opt-Out Waiver

Students can opt out of the purchase of the OU Student Health Insurance Plan if they have **other** acceptable coverage. If you have coverage from another source, you **must** opt-out with your proof of coverage. Proof of coverage can include a valid copy of the front and back of your medical insurance card or a Letter of Coverage from your medical insurance provider stating you are a covered member of the plan.

Any HSC student who has coverage as an employee or dependent on the OU Employee Group Health Plan, other employer-sponsored ACA-compliant group health plan, Tribal coverage, Military coverage, or SoonerCare will be deemed to have acceptable forms of insurance coverage. Your Opt-out waiver will be approved.

Students must purchase Needle Stick coverage to upload into Complio if utilizing the Opt-Out Waiver. Proof of purchase includes the student's name, type of coverage, beginning and end dates of coverage, and amount paid. The front and back copy of the Needle Stick card is not acceptable proof of coverage.

Deadlines vary each enrollment period. The COD's deadline is **before** the campus deadline. If the COD's deadline passes and you have **not** opted out or purchased the Student Health Insurance plan, you will have instruments held, chart locks applied, or be removed from class/clinic.

### Frequently Asked Questions:

1. Where do I go to submit my waiver?  
Domestic students can complete their waiver here: <https://www2.academichealthplans.com/school/5002.html>  
International students can complete their waiver here: <https://www2.academichealthplans.com/school/5007.html>
2. What is my waiver site password?  
Unless you previously changed it, your password is your 8-digit date of birth in MMDDYYYY format.
3. How often do I have to submit a waiver?  
All students enrolled in OU Health Sciences Center (OUHSC) programs are responsible for maintaining health insurance and providing coverage information **each semester or trimester** of enrollment in their programs. If you attend Fall, Spring, and Summer semesters, you will submit three waivers. If you attend Fall and Spring, you will submit two waivers.
4. What is the waiver deadline?  
Each semester has its deadline. The fall semester is in August, the Spring semester is in January, and the Summer semester is in June. Visit <https://ouhsc.myahpcare.com/waiver> (<https://ouhsc.myahpcare.com/waiver/>) for the timeframes and deadlines for each semester. Submit your waiver **one week** before the deadline indicated in case you need to upload additional documentation before the site closes.
5. How long does it take to receive notification that my waiver was approved?  
A separate email as to whether your waiver request has been approved or denied will be sent from Academic Health Plans within seven business days.
6. Should I wait until the last minute to complete my waiver?  
**No.** Complete your waiver as soon as possible. If you need to supply additional paperwork to show compliance, you will have plenty of time. If your insurance coverage is not compliant, you will need to purchase the OU Student Health Insurance Plan or coverage through the Healthcare Marketplace Insurance before the deadline. If you have trouble signing in, let Student Affairs know as soon as possible.
7. What happens if I do not complete my waiver or purchase insurance before the deadline?  
The system automatically closes and you will not fulfill your OU Board of Regents requirement for enrollment, therefore, you will not be able to attend classes or clinic.
8. Do I upload my medical insurance information into Complio?  
The **only** time you will upload any medical insurance information into Complio is if you are enrolled in the OU Student Health Insurance Plan to satisfy your Needle Stick Coverage requirement. Otherwise, you will only upload your receipt for Needle Stick Coverage. Either receipt must display your name, plan purchased, member ID, coverage beginning and end dates, and amount paid. Copies of the front and back of your insurance card are **not** acceptable as proof of coverage.
9. I have medical insurance already, what do I need to upload as my proof of coverage for the waiver system?  
You will need to make sure that your medical card has your name listed. If your name is listed, then you can upload a front and back copy of the insurance card. You may be asked for a Letter of Coverage and a summary of plan benefits from your insurance company. This information can be found on most insurance company's patient portals. If your name is not listed, you will either need to get a new card with your name on it or ask your insurance carrier for a Letter of Coverage stating you are covered under that policy. Medical coverage policy must be



- a. active on, or before, the first day of classes,
  - b. list coverage dates until the end of the semester,
  - c. be printed in English, and
  - d. quoted in United States currency.
10. I have military or Veteran's insurance, what can I upload as my proof of coverage?  
You can submit a front and back copy of your military ID and your Social Security card as your proof or you can ask your insurance carrier for a Letter of Coverage stating your policy is in effect.
11. I have Tribal coverage, what can I upload as my proof of coverage?  
You can submit a front and back copy of your Tribal ID, CDIB card, or a Letter of Coverage from your tribe stating you have coverage and a front and back copy of your Social Security card.
12. I have a Health Sharing Plan; is this acceptable medical coverage?  
No. Health Sharing Plans are not compliant with ACA coverage.  
You will need to purchase the OU Student Health Insurance Plan or another plan through the Healthcare Marketplace.
13. What do I do if my insurance card is in my maiden name and I haven't changed it yet?  
You will need to upload your marriage license with your proof of medical coverage. Be sure to save all of your documents with the last name that you are enrolled with before uploading.
14. If my deductible is too high, will my waiver be denied?  
Medical coverage must be comparable to the HSC student health insurance plan including a \$1000 or less deductible for Domestic students or a \$500 or less deductible for International students plus have a similar benefit model.
15. What are some other reasons why my waiver would be denied?  
Medical coverage must meet the Minimum Essential Coverage as required by the Affordable Care Act (ACA) such as
- a. no exclusions for pre-existing conditions
  - b. preventive care and women's health care as required by the ACA covered at 100%
  - c. no annual or lifetime limits.
- Healthcare-sharing groups do not meet the requirements for acceptable alternative health insurance. Membership in a healthcare-sharing group will not be accepted for waiver approval.  
You will then need to purchase the OU Student Health Insurance Plan or a comparable plan through the Healthcare Marketplace.
16. I tried to log in to complete my waiver and got a message that "my school had not authorized me to fill out this form"; what should I do?  
Please refer to the email sent out by Student Affairs titled Student Health Insurance & Waiver Information. Although you may be currently enrolled with the COD, you will not be able to access the waiver system until the new term activation date. This date varies by semester but it will be listed within the email from Student Affairs.
17. The waiver site is asking for proof of my insurance; what does that mean?  
You will need to supply them with a copy of the front and back of your insurance card but your name must be on it first. If the insurance card does not contain your name, you can either get a new card sent to you or get a Letter of Coverage from your insurance carrier as proof. The waiver site can also ask you to provide a Summary of Medical Benefits.

### Criteria for Acceptable Medical Coverage

1. Medical coverage must meet the Minimum Essential Coverage requirements of the Affordable Care Act (ACA). Student must provide evidence that they are eligible for, and enrolled in, ACA compliant individual coverage purchased through the Exchange (HealthCare.gov

(<http://HealthCare.gov>)) or other ACA compliant individual coverage purchased from an insurance carrier based in the United States.

2. Medical coverage must be **currently** active, in effect, and list coverage dates that cover the entire semester/trimester being waived. Medical coverage cannot become effective **after** classes have started, if you are seeking a waiver.
3. Policy must be in English and any premiums or amounts quoted must be in US currency/dollars.
4. Policy cannot exclude pre-existing conditions and must include a list of the exclusions.
5. International Students must also maintain coverage for repatriation of remains to their home country and medical evacuation to their home country. The benefit for repatriation may not be less than \$25,000, and the benefit for medical evacuation may not be less than \$50,000.
6. If an International Student's health plan does not include medical evacuation and repatriation, a rider must be purchased providing coverage at equal limits to the student health insurance plan as follows:
  - A deductible not to exceed \$500 per accident or illness
  - Medical benefits of at least \$100,000 per accident or illness
  - Repatriation of remains in the amount of \$25,000
  - Expenses associated with the medical evacuation of the exchange visitor to their home country in the amount of \$50,000

International Students may waive the Student Health Insurance Plan if:

1. Student is eligible for, and enrolled in, coverage that is backed by the full faith and credit of the government of the exchange visitor's home country and is provided through an ACA compliant plan.
2. Student is sponsored by the US government or other sponsoring entity that has guaranteed payment of all health expenses, and repatriation and evacuation expenses.
3. Student is enrolled exclusively in distance learning classes at the university.

### Needle Stick Coverage

University of Oklahoma Health Sciences Center students (in Oklahoma City or Tulsa) participating in clinical learning environments are required to have coverage for needle stick injuries. Students may purchase this on a stand-alone basis. If you are enrolling in the OUHSC Student Health Insurance Plan through Blue Cross and Blue Shield of Oklahoma, this benefit is included and does not have to be purchased separately.

Students who have other primary medical coverage can enroll at <https://ouhsc-needlestick.myahpcare.com/>. Upload proof of your purchase into Complio. Your receipt should include the student's name, the type of coverage, the beginning and end dates of coverage, and the amount paid. Uploading a front and back copy of your Needle Stick coverage card is not acceptable proof.

The cost of the policy is \$74 per policy year and it is **not** pro-rated. The policy year begins on July 1 and ends on June 30.

Plan benefits include:

- \$2000 plan maximum per policy year
- 100% coverage at OU Student Health
- Covered expenses

- Outpatient doctor visits
- Outpatient lab tests
- Medications necessary to treat exposure to a needle stick, body fluid splatter, or bloodborne pathogen
- Emergency room visits

#### Frequently Asked Questions:

1. How do I prove I have Needlestick Insurance if I didn't receive a new card?  
You will not receive a new card every year. You will upload your enrollment receipt for either the Needle Stick coverage or the OU Student Health Insurance Plan into Complio. Be sure the receipt shows your name, plan purchased, member ID, coverage beginning and end dates, and amount paid for it to be valid. Copies of the front and back of your insurance card are **not** acceptable as proof of purchase to meet the Needle Stick requirement in Complio.
2. Do I have to buy Needlestick Insurance?  
Yes, Needlestick Insurance is required for all College of Dentistry students. If you are purchasing the OU Student Health Insurance Plan, Needlestick Insurance is included as a benefit. If you have medical coverage that includes Needlestick as a benefit, OUCOD still requires purchasing this stand-alone insurance. In the event of an exposure, your doctor visits, lab tests, ER visits, and necessary medications are 100% covered up to \$2000 per year. If you choose to use your policy, you will be subject to all out-of-pocket costs that include copays, coinsurance, and deductibles up to your maximum out-of-pocket per your plan or may need a referral before treatment can be rendered. This could be several thousands of dollars if you have a high out-of-pocket maximum. The Needlestick Insurance will save you from that financial burden and ensure that you get all necessary medical care as required.

## Annual Training

You must complete the following training courses by visiting the OnPoint website (<https://onpoint.ou.edu>), then upload one certificate of completion for each requirement. Annual Training Courses include:

- HIPAA Privacy and Security Training
- Hazardous Communication / General Safety
- Bloodborne Pathogens
- Tuberculosis Awareness
- Sooner Fire Safety

HIPAA training course is due within 5 days of the course being assigned or the certificate expiration date. OSHA training courses are due within 30 days of the course being assigned or the certificate expiration date.

#### Frequently Asked Questions:

1. How do I log into Onpoint?  
You can sign in using your HSC User Name and Network Password.
2. Where do I find my annual training courses?  
Assigned training will be visible on the Home page, within OnPoint, under the My Learning Assignment section.
3. The course I need to take is not listed under My Learning Section. What should I do?  
You can use the **search** feature in the upper right corner of the OnPoint Home screen. Type in a portion of the course name for which you are searching. For example: "fire" for the Sooner Fire Safety course. Once the course is found, click the title link. Click Register.

Click Start to take your course. Screenshot or save your certificate of completion to upload into Complio.

You cannot take a course until it is within 30 days of the certificate expiration date. If your certificate expires on December 1st, OnPoint will not allow you to begin the course until November 1st.

4. I uploaded a screenshot of my Training Transcript. Complio denied it; why?  
The certificate of completion must be uploaded into each training course. If the certificate is not uploaded, the requirement will automatically be denied.
5. How do I find my certificate of completion?
  - Sign-in to OnPoint
  - On the right side of the **home** page, under **quick links**, click the link titled: **training transcript**.
  - On the **training transcript** page, under **activities**, locate the course name for the certificate you need for Complio.
  - Click the blue icon to the **left** of the course title.
  - Screenshot, print, or export to PDF the certificate to upload into the correct Complio requirement.
  - Upload **one** certificate per Complio requirement.

## HIPAA Privacy and Security Training

All workforce members are required to complete the HIPAA Privacy and Security training annually. It is each individual's responsibility to stay current on the required training. Annual trainings can be accessed via the OU Enterprise Learning Management System known as OnPoint (<https://onpoint.ouhsc.edu/>). OnPoint will send email notifications to all workforce members up to 30 days before the expiration of the previous year's certificate. It is the responsibility of each workforce member to complete training promptly.

(Workforce Members include employees, students, trainees, volunteers, temporary employees and/or affiliates). OUHSC's policy and procedures may be different from other employers and Workforce Members must comply with OUHSC's rules and regulations. Workforce Members are bound by OUHSC's policy even if they have not read it. Civil and criminal penalties will still apply.

#### Frequently Asked Questions:

1. When is my HIPAA training due?  
You must complete HIPAA training within 5 days of receiving access to OnPoint. You will receive emails from HIPAA advising you that you are due. HIPAA training can be found here: <https://onpoint.ou.edu/>

## Hazardous Communication/General Safety Training

In order to comply with federal, and state regulations, the College of Dentistry has made a commitment to provide information about safe work procedures and chemical hazards, as well as other potential hazards, to its workforce members. This commitment will be met by instituting a documented policy of employee training that fully explains job hazards and safe work procedures prior to job assignment. To ensure that safe work procedures are followed, COD Director of Compliance or the OUHSC Environmental Health and Safety Office will conduct unannounced laboratory and/or clinic inspections. Training guidelines are as follows:

1. Every employee at the College of Dentistry is required to complete annual health and safety online training available at <https://onpoint.ou.edu/> (<https://onpoint.ou.edu/Account/LogOn/?ReturnUrl=%2f>)

2. Every student receives hazard training throughout his/her tenure as a student.
3. A copy of the OUHSC Environmental Health and Safety policies and lab manual is available online at EHSO Manual 2022-2023 - Hazardous Waste (ouhsc.edu) (<https://labman.ouhsc.edu/hbSections.aspx?ID=610>)

### Hazardous Communication Program Documents

Safety Data Sheets (SDS) can readily be obtained online 24 hours a day from any computer at the following web site:

Safety Data Sheets (ouhsc.edu) (<https://dentistry.ouhsc.edu/Material-Safety-Data-Sheets/>)

Hard copies of SDS sheets are maintained in the Shipping and Receiving office at the College of Dentistry, however it is recommended using the Internet, as the information is more easily accessible.

Workforce members are to look at labels for warnings such as flammable and toxic. The label contains information on proper PPE to be worn during handling as well as proper procedures for spill clean-up and emergency measures.

### Hazardous Material Labeling

If a substance is transferred from the original manufacturer's container and placed in a secondary container, the container must be labeled with contents and hazard warnings. Small quantities transferred to secondary container and not labeled must be used immediately.

### Tuberculosis Awareness

The Tuberculosis Awareness course will introduce you to the signs and symptoms of tuberculosis, as well as provide information about the OUHSC/OU-TULSA Tuberculosis Infection Control Policy and the Tuberculosis Skin Test Program.

Workforce members will also learn the proper procedures for identifying and interacting with patients with possible tuberculosis, and how to use appropriate respiratory protection.

Upon completion of the course, you should be able to:

- Recognize the signs and symptoms of active tuberculosis (TB)
- Know what to do if a patient is suspected to have active TB
- Understand that a positive skin test does not necessarily mean a person is infectious
- Understand that respirators (not surgical masks) should be worn by workforce members under certain conditions
- Understand that participation in the OUHSC/OU-Tulsa PPD skin testing program is required for workforce members who have the potential for occupational exposure to TB

The Tuberculosis Awareness course is located at <https://onpoint.ou.edu/> and is due annually.

### Tuberculosis Exposure Control Plan

It is the intention of the OUHSC to adhere to current guidelines established by the CDC for preventing the transmission of tuberculosis (TB) in health-care facilities. This will be accomplished through the OUHSC Tuberculosis Infection Control Program, which shall incorporate the fundamental elements identified in the CDC guidelines, and which shall be in compliance with local, state, and federal law. Adherence to the procedures outlined in this infection control program should greatly reduce the risk to persons in these settings. The College of Dentistry complies with the OUHSC Infections Disease Policy and Program

found at HSC/OU-Tulsa Infectious Disease Policy (ouhsc.edu) (<https://compliance.ouhsc.edu/Portals/1061a/Assets/EHSO/Policies%20and%20Programs/HSC.OU-Tulsa%20Infectious%20Disease%20Policy-%202020.pdf?ver=2020-11-09-130904-490>)

### Identification of Patients Who May Have Active TB

Patients with a medical history or symptoms suggestive of active TB should be referred promptly to the local city or County Health Department for medical evaluation of possible infectiousness. Such patients should not remain in the dental care facility any longer than required to arrange a referral. While in the dental care facility, they should wear surgical masks and should be instructed to cover their mouths and noses when coughing or sneezing.

Patients suspected or confirmed to have active TB should be considered infective and will not be treated at the College of Dentistry until cleared by physician as no longer contagious. Elective dental treatment should be deferred until a physician confirms that the patient does not have infectious TB.

Patients with a persistent cough should be asked the following questions prior to seating in the clinic area:

1. Have you had a cough for more than three weeks?
2. Do you currently have a cough of any duration, plus one of these symptoms: cough up blood, weight loss, night sweats or fever?

If the patient responds "yes" to any of the above questions the following must occur:

1. Give patient a surgical mask and ask them to keep it on.
2. Refer them promptly to the local city or County Health Department for medical evaluation.
3. Reschedule the patient for a time when they are not infectious or medically cleared of active TB.

### Bloodborne Pathogens

Universal/Standard Precautions - The College of Dentistry follows the Centers for Disease Control and Prevention (CDC), Organization for Safety and Asepsis Procedures (OSAP), OSHA, and the University of Oklahoma Health Sciences Center (OUHSC) Infectious Disease Policy (HSC/OU-Tulsa Infectious Disease Policy (ouhsc.edu) (<https://compliance.ouhsc.edu/Portals/1061a/Assets/EHSO/Policies%20and%20Programs/HSC.OU-Tulsa%20Infectious%20Disease%20Policy-%202020.pdf?ver=2020-11-09-130904-490>)) recommendations and guidelines for infection control to ensure patient and workforce member safety.

1. Standard/Universal precautions for infection control will be utilized for all patient care.
2. Annual training for Bloodborne Pathogens is located at <https://onpoint.ou.edu/>

### Bloodborne Pathogen Post-Exposure Protocol Post Exposure Evaluation

If an employee or student sustains an exposure incident (such as a stick with a contaminated needle/scalpel/dental wire or a splash of potentially infectious material in the eye, mouth, mucous membrane, or non-intact skin), the exposed person should immediately:

1. Clean wound with soap and water; flush mucous membranes with water or normal saline solution.
2. Notify his/her supervisor or supervising faculty.

3. Contact Director of Compliance (DOC) at 405-271-3083.
4. Notify source patient, if known.
5. Proceed for treatment as soon as possible, preferably within 1-2 hours of exposure following CDC guidelines.
6. Document exposure on the required forms.

The COD Office of Compliance will provide additional instructions on how to proceed with testing and medical care. After hours, proceed to nearest hospital emergency room.

Tests performed on source patient are:

1. 30-40 minute rapid HIV
2. HBV and HCV

Results of the source individual's testing shall be made available to the exposed workforce member; he/she shall be informed of applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual.

### Post Exposure Follow-Up

Following an exposure incident, a confidential examination and follow-up shall be made available to the workforce member to address such infectious diseases as HBV, HCV and HIV. This shall include confidential post-exposure prophylaxis and counseling in accordance with current CDC protocol.

Documentation will be made of incident, route of exposure, circumstances of incident, and prevention of further exposures (Safer Needle Devices Questionnaire).

### Bloodborne Pathogen Exposure Control Plan

Eliminate or minimize workforce members' (faculty, residents, staff and students) occupational exposure to blood or other potentially infectious materials (OPIMs).

### OSHA Needle Safety Requirements

In an effort to ensure that workforce member's concerns regarding needle sticks and other sharp injuries are addressed; the EHSO asks that they complete a Safer Needle Device Questionnaire on an annual basis.

### Safer Needle Device Questionnaire

In an effort to ensure that your concerns regarding needlesticks and other sharps injuries are addressed, we ask that you complete this questionnaire and return it to your clinic manager by \_\_\_\_\_ (date).

Clinic Manager:

Address:

Are there any tasks you perform using a needle or other sharp for which you feel there is an elevated risk of injury?

Yes

No

1. If you answered yes to question 1, please describe the task(s):
2. If you answered yes to question 1, do you believe a safer needle device or other device would reduce the risk of injury?

Yes, I would like to try (indicate as much information as you know about the make, model, manufacturer, vendor, catalog number, etc.):

Yes, I would like someone to suggest a device.

No, I don't think a device will help, but I do think a change in work practices could help as follows:

You may submit this form anonymously, but if you do, we will not be able to contact you for input. If you would like us to contact you to help select a safer needle device or implement your ideas about how to reduce the risk of injury, please complete the following information:

Name:

Clinic:

Phone Number:

### Sooner Fire Safety

The University of Oklahoma Health Sciences Center (OUHSC) Office of the Fire Marshal operates under the Office of Construction Oversight and Fire Protection is to protect lives and property from fire, explosions, and related hazards by providing a safe work environment through plan review and enforcement of fire codes and public education. The department also provides technical assistance to responding local fire departments.

We believe prevention is the most effective means of fire protection. Through enforcement of national and state fire codes and education of OUHSC employees we can deliver vital fire prevention services and information creating safe work environments and reducing the impact of fire.

The OUHSC Fire Marshal website is located at <https://firemarshalsoffice.ouhsc.edu/>.

Annual training is located at <https://onpoint.ou.edu>.

### Title IX: Sexual Assault Prevention

The University is committed to creating and maintaining a community where all persons who participate in University programs and activities can work and learn together in an atmosphere free from all forms of harassment, exploitation, or intimidation.

The University condemns discrimination based on sex, sexual harassment, sexual assault, and sexual misconduct. Any such activity committed by a member of the University community may subject the individual to University sanctions as well as civil and criminal penalties.

Additional Sexual Misconduct resources can be found at <https://students.ouhsc.edu/Current-Students/Student-Wellbeing/Sexual-Misconduct> (<https://students.ouhsc.edu/Current-Students/Student-Wellbeing/Sexual-Misconduct/>).

Annual training is due by October 15th of each year. If you fail to complete this training by the deadline, a hold will be placed against future enrollment and that hold will remain until the training is completed. The hold will automatically be removed the day after you complete the required training.

The training is located at: <https://onpoint.ou.edu>

### Frequently Asked Questions:

1. Do I need to upload my certificate of completion into Complio?  
No. HSC sends COD Compliance a list of all students who have **not** completed the SAP training. Your name will remain on the list as a non-compliant student until you finish the course. Non-compliance



with the Title IX: SAP course will impact your ability to enroll for the Spring semester.

## Additional Requirements

### Basic Life Support (BLS/CPR Requirements)

All workforce members with direct provision of patient care are required to have successfully completed the Health Care Provider Level of Basic Life Support (BLS) course. The College requires that retraining is certified every two years, consistent with protocol from the American Heart Association (AHA). Online CPR training is accepted only if there is a practical component to the certification.

1. All students are required to obtain and maintain CPR certification throughout their dental and dental hygiene education. The University of Oklahoma College of Dentistry's Health and Safety Committee recommends either the American Heart Association or American Red Cross Basic Life Support (health care provider level) CPR course that includes adult, child, and automatic external defibrillator (AED) training. Online CPR courses do not meet the criteria for this requirement; the course must have a practical application component.
2. All entering dental and dental hygiene students must upload a signed copy of their CPR card into their profile in the Complio® system no later than the first day of the fall semester. It is the student's responsibility to keep track of the expiration date and renew the certification before expiration. Current students who allow their certification to expire will be removed from all clinics until certification is renewed and a current card has been uploaded to their profile in the Complio® system. The College of Dentistry's Office of Compliance oversees the student training and compliance.
3. All faculty and staff in charge of the provision of patient care are required to maintain a current Health Care Provider Level Basic Life Support certification. All employee records of training are maintained electronically.
4. Current AHA policy will not allow BLS certification to any person who is unable to physically perform the procedures in BLS and they are issued a Heart Saver Card only. Faculty that fall in this category are not allowed to supervise any clinical operations unless other faculty with full certification is present.

**Note:** Students will not be able to attend class or clinic as long as their CPR has expired.

### Frequently Asked Questions:

1. Can I use my Heartsaver card for First Aid and CPR instead of taking a BLS class?  
No. This course is not for healthcare professionals but geared toward fitness trainers, babysitters, construction workers, or other safety professionals. You must be certified in a **BLS class for Healthcare Professionals**. Military CPR that meets the BLS standard is acceptable.
2. Can I use my Military CPR card?  
Military CPR that meets the BLS standard is acceptable.

### Policy Acknowledgement Statement

After reviewing the OUHSC Student Handbook, OUCOD Student Handbook, and Clinical Operations Manual, each student must electronically sign and date the Policy Acknowledgment located within Complio.

### Frequently Asked Questions:

1. Where is the COD Student Handbook and Clinic Operations Manual located?  
The COD Student Handbook and Clinic Operations Manual are located on the College of Dentistry (<https://dentistry.ouhsc.edu/Login/?returnurl=%2fIntranet>) website. You must use your Username and Password to gain access. On the left side of the screen, click the **students** link and then click the Student Handbook and Clinic Manuals link.
2. Where is the OUHSC Student Handbook located?  
You can find the OUHSC Student Handbook here: <https://studenthandbook.ouhsc.edu/>

### Technology Consent and Release Agreement

Students must electronically sign and submit the Technology Consent and Release Agreement form located within Complio. The student is giving permission to the COD to use their voice, image, likeness, works, etc., for educational purposes. Students may also opt out of the Technology Consent and Release Agreement at any time.

### Laptop Encryption Attestation

OU policy requires that all laptops used for University business – which includes checking OU email – must be encrypted, regardless of who owns the laptop or what operating system is installed. Health Sciences program students must encrypt their laptop computers and maintain the encryption status while enrolled as Health Sciences students. **Students must enable encryption on their laptop and upload documentation by Tuesday, January 16, 2024.** Failure to comply with this policy will delay a student's participation in academic and clinical training. Click this link to begin the process: <https://www.ou.edu/ouit/studentencryption> (<https://www.ou.edu/ouit/studentencryption/>)

### Frequently Asked Questions:

1. How do I show compliance?  
When you complete the steps in the link above, you will receive a confirmation email from the OU Information Technology (IT) Service Desk showing a status of "Resolved." Starting today, Friday, October 20, 2023, HSC students may begin uploading a PDF version of their encryption confirmation email to Complio in the new Device Encryption category. Any Health Sciences program student who has not uploaded the required documentation by Tuesday, January 16, 2024, will be deemed non-compliant in the Complio system and their participation in academic and clinical training will be delayed. To access Complio, please visit here (<https://students.ouhsc.edu/Current-Students/Student-Wellbeing/Health-Clinic/Complio/>).
2. What is device encryption and what does it do?  
Device encryption is a technology that protects the contents of your laptop from unauthorized access by converting the contents into unreadable code. Encryption provides a stronger level of protection than other security features, such as user logins and passwords. Device encryption encrypts the entire drive and therefore users do not need to encrypt individual folders or files.
3. Why is device encryption important?  
The main value of device encryption is in protecting data if the device is lost or stolen. Laptops are portable and thus more likely to be lost or stolen. A simple login does not protect the data, but device encryption does.
4. Is device encryption common practice?  
Encryption is a basic requirement for Health Insurance Portability and Accountability Act (HIPAA) compliance and is commonly required for handling other forms of sensitive information. It is expected practice in the health care industry. As a healthcare professional, you

will be required to take similar steps to protect patients and other sensitive information.

5. Must I encrypt my personal laptop?

Yes. All faculty, staff, and students at OU must encrypt any laptop computer that is used as part of University business. For students, University business includes tasks such as academic assignments, research, and even checking OU email. All students enrolled in Health Sciences programs must encrypt their laptops.

6. How long does it take to encrypt my hard drive?

It takes about 20 minutes to enable the encryption software on a laptop and then up to several hours to complete the encryption. During the encryption process, you can use your computer normally. The encryption process should not disrupt your work, but keep your laptop plugged in and avoid shutting it down or restarting it.

7. How do I start the process?

Your laptop has a native (built-in) encryption program. You will enable that encryption and then download the program that will confirm your encryption has been completed and remains on your device. Visit <https://www.ou.edu/ouit/studentencryption> (<https://www.ou.edu/ouit/studentencryption/>).

8. What type of encryption software does OU use?

OU uses Microsoft's BitLocker Drive Encryption for devices running Windows 10/11 Education or Pro or above and Apple's FileVault for devices running Macintosh OS X. Both encryption solutions are native to the respective operating system and offer significant improvement in system performance. Mobile devices, such as tablets and smartphones, are also encrypted using native device encryption.

9. Need help?

If you need further assistance, call IT Service Desk at (405) 325-HELP (4357) or visit [itsupport.ou.edu](http://itsupport.ou.edu) (<http://itsupport.ou.edu/>).

## Criminal Background Checks

A national criminal background check ("CBC") is required of each conditionally accepted applicant prior to full admission and at least annually thereafter for every continuing student. Conditionally accepted applicants who have an adverse finding on a CBC report may be denied full admission/matriculation, and current students may be disciplined in accordance with established University policy.

First year students will complete their initial CBC through Certiphi when completing their applications for acceptance. Returning students will complete their annual CBC through Complio beginning their second year. The Director of Compliance will notify students when to initiate the CBC process and of the deadline. CBC must be initiated by the student before the deadline or the student will be held from class or clinic. Students should allow at least 3 business days for the results to be reported.

### Frequently Asked Questions:

1. Where do I go to complete a background check?

You will purchase the background check option through Complio. Be sure that all of your information is accurate by listing all of the names you have used in the past plus any additional addresses where you may have lived. The cost is \$56.70.

## Drug Screening

Drug Screening is required for OUHSC students/accepted applicants admitted to designated degree programs that include or may include a clinical component at a health care facility that uses drug screening as a condition of its affiliation with the University.

As applicable, students/accepted applicants who do not pass the drug screening may be unable to complete degree requirements or may be denied admission to or suspended or dismissed from the degree program.

Drug screenings are required annually. The Director of Compliance will notify students when to initiate the Drug Screening process and of the deadline. The Drug Screening must be initiated by the student before the deadline or the student will be held from class or clinic. Students should allow at least 3 business days for the results to be reported. See the Drug Screening Policy ([https://studenthandbook.ouhsc.edu/filemanagerUploads/Student\\_Handbook/Drug\\_Screening\\_Policy/Drug%20Screening%20Policy.pdf](https://studenthandbook.ouhsc.edu/filemanagerUploads/Student_Handbook/Drug_Screening_Policy/Drug%20Screening%20Policy.pdf)) for details.

### Frequently Asked Questions:

1. Where do I go to initiate a drug screening?

You will purchase the drug screening option through Complio. Be sure to follow the directions in the email for the drug screening process. The cost is \$34.00.

2. I have a medical marijuana card, where do I send it?

After completing your required drug screening, if you test positive for Cannabinoids, you will be contacted by the Medical Review Officer from Complio or the Director of Compliance. They will only attempt to contact you three times. Be sure to answer this call or return any calls as soon as possible. You will supply the Director of Compliance with a copy of your marijuana card by emailing it to [Kim-Graziano@ouhsc.edu](mailto:Kim-Graziano@ouhsc.edu).

3. I am currently out of the state of Oklahoma, can I take my drug test in another state?

Yes, you will utilize the map within Complio to find alternate locations in different cities or states. Testing is available all over the US but you will need to locate one that is contracted with Complio or the COD will **not** receive your results.

4. I received my drug test results back and they state "Negative – Dilute". What should I do now?

You will need to retest. Follow the same instructions as before; be sure to not drink too much water or other liquid before testing. To avoid dilute samples, please limit your fluid intake to 24 ounces 2 hours preceding the collection. The cost of the drug screening and any retakes is \$34.00 each time.

## Medical Marijuana Policy

Medical marijuana is legal in the State of Oklahoma, but current and prospective dental students should be aware of the following issues that may arise during their academic career in the College of Dentistry. Absent specific requirements from affiliated partners, students who test positive for a marijuana derivative (THC) and have a license for medical marijuana will be regarded in the same way as students with prescriptions for drugs screened by drug test panels. Our current vendor will submit tests positive for THC to their Medical Review Officer (MRO) for review. The MRO will contact the student and they will have to provide proof of a current medical marijuana license card to the MRO for verification. The drug screening will still report positive but will indicate a medical marijuana card has been presented. It is at the discretion of the Director of Compliance and/or The Dean of Student Affairs to request a copy of the medical marijuana license card.

The College of Dentistry will work with our affiliated partners to identify whether the rotation sites will accept a positive drug test if the student has a license for medical marijuana. A positive result may prohibit a student with a medical marijuana license from attending a rotation if that rotation site does not accept the medical marijuana license as an

exception to its drug policy. This could result in the student's inability to complete experiential requirements and delay or prevent a student from graduating.

The University of Oklahoma receives federal funds and is legally bound to comply with the Federal Drug Free Schools and Communities Act. As required by the Act, please be aware that students are not permitted to use (smoke or consume), possess, distribute, or cultivate marijuana for any reason on campus even if they have a medical marijuana license.