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Owner: Skye Reynolds: ES&D Director

Policy Area: Employee Support &

Development

Reference Tags:

# **Observation Experience Policy, HR-5761-DC**

# **Policy Statements:**

- 1. Within the constraints of available resources and in compliance with regulations, standards, and policy, DCMC shall provide individuals at its discretion an opportunity to learn about various health careers through an Observation Experience.
- 2. All Observation Experiences shall be "hands-off," observation-based only; with no physical patient contact or participation in direct patient care.
- 3. Observers include the following:
  - A. Students in grades 9 12 and over 13 years of age.
  - B. Post High School professional students
  - C. Physicians, nurses of other health care professional not employed on or staff at DCMC.
  - D. Applicants for employment.
- 4. Observers exclude the following:
  - A. Members of the DCMC Medical Staff.
  - B. Individuals on a pre-arranged tour of any of the DCMC facilities.
  - C. Fellows or students who have been placed at DCMC as part of affiliation and program agreements established with their respective colleges or universities.

**NOTE:** for information on student placements, contact Employee Support & Development.

- 5. Guidelines for Length of Observation:
  - A. For students grade 9 12 and over 13 years of age, the guidelines for length of observation is less than or equal to one work day.
  - B. For post-high school professional students and other health care professionals not on staff or employed at DCMC, the guideline for length of observation ranges from a few hours on a predetermined day to as much as 40 hours over 6 months.
  - C. These are guidelines and may be extended if requested by the Sponsor, with approval from the Chief Medical Officer or Chief Culture Officer.
  - D. The overall length of the observer's observation request for the Surgical Department

#### must be:

- a. Limited to one work day.
- b. Scheduled Monday through Friday.
- Set up during designated observation dates as noted on the Observation
   Agreement Form. Any additional days/hours require approval from the Director of
   Surgical Services.
- 6. Observers are required to:
  - A. Have a site sponsor;
  - B. Complete and submit all required documents prior to beginning the observation;
  - C. Be accompanied by their Sponsor or sponsor's designee at all times;
  - D. Obtain and wear an identification badge at all times during the observation.
  - E. Dress Professionally: close toed shoes, no jeans.
- 7. Observers may not:
  - A. Conduct a physical exam or touch the patient in any manner
  - B. Take a patient history
  - C. Handle patient equipment
  - Make recommendations regarding specific patients, provide consultation or make decisions about patient care;
  - E. Document in the Medical Record
  - F. Take photos or videos
- 8. All Observers shall maintain the confidentiality of Organizational business and patient Protected Health Information ("PHI") during and following their Observation Experience. Failure to maintain patient confidentiality could result in termination of participation in the Observation Experience, criminal penalties, including fines and imprisonment, as well as privacy lawsuits.
- 9. Observers shall be limited in their access to patients and patient PHI (in either paper or electronic format).
- 10. At all times, the Observer must be under the direct supervision of a DCMC employee.
  - A. Employees who supervise Observers must ensure the protection of patient's PHI and privacy.
  - B. Patients must be notified of an Observer viewing their care.
  - C. Observers are not allowed to read medical records.
  - D. Patients will always be offered the opportunity to deny an Observer's presence or access during actual observations.
  - E. Verbal authorization by the patient to allow or deny participation in the encounter by an Observer shall be documented in the patient's health record.

#### **Procedures:**

- All individuals requesting Observation Experiences should be directed to DCMC Education Department/Student Coordinator a minimum of 3 weeks before the requested observational experience.
- 2. The DCMC Student Coordinator will review the documents to determine if the Observer meets the eligibility requirements.
- 3. If an individual meets the eligibility requirements, the Student Coordinator will ensure the completion of required paperwork, health screenings, and orientation prior to scheduling any Observation Experience.
- 4. The Student Coordinator will work with appropriate DCMC departments to schedule and coordinate the Observation Experience.
- 5. In the event an Observation Experience is requested as part of the recruitment process, ES&D will ensure the necessary paperwork and orientation is completed as listed in requirements for Observation 8 hours less prior to the participation in an Observation Experience.
- 6. Observation Experience will be coordinated once all required documents are received and confirmed to be completed by the Education Coordinator.
- 7. The individual seeking the observational experience will receive confirmation from the Student Coordinator.

#### Related Policies/Position Statements /Other Documents:

- PV-2: Student Access to Patient PHI and Organizational Information
- HR 5701: Harassment Free Workplace Policy
- HR 5702: Confidentiality of Business Information Policy
- HR 5703: Confidentiality of Patient Protected Health Information Policy
- HR 5716: Personal Appearance policy
- HR 5725: Drug and Alcohol Free Policy

#### **Definitions:**

**Observation Experience**: A learning opportunity in the health care field for an eligible individual through a hands-off, observation experience limited to 8 hours or greater than 8 hours.

**Observer**: A participant in an observation experience that is "hands-off" and observation based only.

#### **Protected Health Information (PHI):**

Individually identifiable health information that is created by or received by the Organizations, including demographic information that identifies an individual, or provides a reasonable basis to believe the information can be used to identify an individual, and relates to:

- Past, present or future physical or mental health or condition of an individual.
- The provision of health care to an individual.
- The past, present, or future payment for the provision of health care to an individual.

#### Values:

This Policy has been reviewed for support of the DCMC Values.

# **Key Words:**

Observer, Observation

# **Applicable Standards:**

• Joint Commission Standard IM.02.01.01 – Protect Privacy of Health Information

## **Applicable Federal/State Regulations:**

• 45 CFR § 164.501 (HIPAA)

#### For More Information Contact:

**Employee Support & Development** 

### **Responsible Senior Leader:**

Chief Culture Officer

# **Approved By:**

Senior Leader Team: 9/2016; 2/2018; 5/2019; 9/22/2020;

#### Notice:

This information is an accurate state of published Door County Medical Center Policy as of the time of publication. Door County Medical Center adopts the Policy and recommends that the user always check for the latest version in PolicyStat, before any subsequent use.

### **Attachments**

Observation Experience Orientation Handbook.docx

Observation Experience Agreement Form.docx

Observation Experience Authorization Form

**Observation Experience Host Observation Orientation** 

# **Approval Signatures**

| Approver                                 | Date      |
|--|-----------|
| Susan Meintzer: Administrative Assistant | 9/22/2020 |
| Kelli Bowling: Chief Culture Officer     | 9/8/2020  |

