



Policy: Access to Patient Care Facilities - Non-Employee Requirements

Effective: 11/08/22

Identifier: S-FW-EC-1157

Acute Care: ENC GR LJ MER Ambulatory SHAS

PURPOSE: To establish minimal access requirements for non-employee individuals conducting business in a Scripps facility. Facilities and/or departments may establish additional requirements as appropriate.

I. DEFINITIONS

- A. **Scripps Sponsor:** The individual Scripps Manager or above, responsible for establishing contractual arrangement/agreement or individual agreement with the non-employee or their representing agency and coordinating or documenting the nonemployee access requirements.

Medical Staff member serves as sponsor on behalf of visiting physician/s or individual (non-medical staff members and/or individuals sponsored by a medical staff member).

- B. **Patient Care Area:** Include, but are not limited to, inpatient care units, outpatient clinics, treatment areas, surgical suites, cardiac catheterization laboratories, special procedure areas, waiting rooms, hallways, or other areas where a caregiver interacts with a patient or family member.

II. POLICY

- A. For this policy, non-employees include, but are not limited to, students, physicians, personnel contracted to provide care, service, construction or goods delivery, volunteers, vendors, visiting medical professionals, and individual observation experience. Non-employees have been categorized considering primary role, work location in proximity to patients and staff.
- B. Scripps leadership is accountable for the presence and control of non-employee individuals conducting business or providing service in Scripps facilities. Minimum access requirements per general category of personnel likely to be present in a Scripps facility are established in **Attachment: Access Requirements for Non-Employees to Scripps Facilities**. Educational Affiliations, Student Placement and Observation Experience, S-FW-HR-0104 establishes additional requirements for individuals seeking student/observation experience.
- C. Accountability for establishment and approval of the requirements is designated as follows:
1. Background Screening; S-FW-HR-0225 (Scripps policy)
 2. Health Screening (As established and approved by System wide Infectious Disease Council)
 3. Contractual/Agreement validations (As required by Supply Chain Management, and Legal Department)
 4. Safety (Established by Environmental Health & Safety Committee)
 5. Badge Identification System; S-FW-EC-2003 (Scripps policy)
 6. Confidentiality of Information; S-FW-IM-0201 (Scripps policy, established by Patient Rights, Compliance and Privacy Officer)
- D. Non-employee personnel must fall under the accountability of a Scripps Manager or above. The Scripps sponsor of a non-employee is responsible for establishing

procedures that implement and validate the requirements established in **Non-Employee Access Requirements Reference Grid; SW-EC-1157**.

- E. Physicians wishing to establish a clinical observation experience for a visiting physician or individual must go through the Medical Staff Office. Utilize the **Access Requirements Reference Grid SW-EC-1157**.
- F. Emergent access by a non-employee may be authorized by the sponsoring Scripps Manager based on evaluation of circumstances of need, task at hand and length of presence in the facility. Efforts should be made to achieve and document requirements as soon as reasonably possible.
- G. Scripps leadership retains upon review of a relationship and purpose of an individual's presence, the discretion to modify requirements or request production of documentation of requirements from a non-employee or their associated agency/company at any time. Managers must inform non-employees or their contracting party of their obligation to produce, upon request from Scripps, within twenty-four hours documentation of requirements.
- H. Requirements may change based on regulatory agency mandates (e.g., California Department of Public Health) and/or public health orders (e.g., California OSHA Emergency Temporary Standards).

III. PERSONNEL

Scripps Personnel and Physicians

IV. ATTACHMENT

Non-Employee Access Requirements Reference Grid

V. RELATED PRACTICE DOCUMENTS

- A. Background Screening; [S-FW-HR-0225](#)
- B. Badge, Identification System; [S-FW-EC-2003](#)
- C. Confidentiality of Information; [S-FW-IM-0201](#)
- D. Educational Affiliations, Student Placement and Observation Experience; [S-FW-HR-0104](#)
- E. Verification of Eligibility to Participate in Federally Funded Healthcare Programs; [S-FW-HR-0918](#)
- F. Licensure/Certification Verification; [S-FW-HR-0900](#)
- G. Vendors, Pharmaceutical Service Representatives, Relations; [S-FW-EC-1156](#)
- H. Workplace Violence Prevention Plan; [S-FW-EC-1002](#)

VI. SUPERSEDED

Access to Patient Care Facilities, Non-Employee Requirements for; S-FW-EC-1157, 10/19

Document Chronology		
ORIGINAL: 04/11	REVISED: 09/17, 10/19, 10/22	REVIEWED: 09/14
DEVELOPMENT SUMMARY		
<p>05/23 Attachment Updated: Health Screening requirements pg2 – <i>approved 05/24/23 by Ghazala Sharieff, MD</i></p> <ul style="list-style-type: none"> Written attestation of immunity for Tdap (Tetanus/Diphtheria/Pertussis) vaccination is acceptable for Physician observers (Personnel Category 3) Added requirement for <i>TB Risk Assessment Questionnaire</i> to align with current process for initial TB screening. <p>10/22 Revised: no change in practice, statement added to address that requirement may change based on regulatory agency mandates (e.g., California Department of Public Health) and/or public health orders (e.g., California OSHA Emergency Temporary Standards).</p>		
Development Workgroup		
Function	Member Name	Title/Discipline
Workgroup Leader/Owner	Steve Peterson	Sr. Director, Facilities/Support Services
Physician Champion	Craig Uejo, MD	CVP, Chief Quality Officer
Compliance Representative	Taunya Juliano	Corporate Compliance & Privacy Officer
Centralized Credentialing Services	Mari Hasegawa	Manager, Centralized Credentialing Services
Supply Chain Representative	Cecile Hozouri	AVP, Supply Chain Services
Human Resources Representative	Robert Wozniak	AVP, Human Resources
Infection Prevention Representative	Lisa Kilgore	Director, Epidemiology, Quality
Security Representative	Anthony Roman	Director, Support Operations
CFLI Representative	Tammy Nguyen	Professional Development Specialist
Legal Representative	Margaret Mangin	Corporate Counsel
ENDORSEMENTS and APPROVALS		
Function	Chair Name/Title/Position	Dates
Executive Sponsor	Tina Picket, AVP, Facilities & Support Operations	10/18/22
Infectious Disease Council	Gonzalo Ballon-Landa, MD	09/12/22
Environmental Health and Safety Committee	Steve Peterson, Sr. Dir., Facilities/Support Operations	09/12/22
Acute Care Operations and Clinical Excellence	Ghazala Q. Sharieff, MD., MBA., Corp. SVP., Hospital Operations and CMO	10/18/22
Executive Cabinet	Chris Van Gorder, President & CEO	10/25/22

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Personnel Category	Non-Employee Personnel Description	Responsible Scripps Sponsor
1	Public, patient visitor, visitor to hospital/clinic administration	All Staff
2	Individuals Conducting Business, <u>not accompanied by a Scripps sponsor</u>, or <u>visiting patient at their request</u>. (Consultants, direct patient service vendors who are personnel from other facilities visiting patient to coordinate or provide support to care, examples, forensic officers, Home Health, or Hospice representatives)	All Staff
3	Individuals present for educational / observation experience (students). Complete category 3 below as appropriate and additionally, specific student /observation requirements established in Scripps Policy <i>Educational Affiliations, Student Placement and Observation Experience S-FW-HR-0104</i> Individual/s who are sponsored by a Scripps physician ; their presence is to observe for clinical experience.	Reference Scripps policy: <i>Educational Affiliations, Student Placement and Observation Experience S-FW-HR-0104</i>
4	Physicians & Allied Health Practitioners members of the facility medical staff.	Centralized Credentialing and Medical Staff Administration
5	Volunteers	Manager Volunteer Services
6	Patient Care Personnel (dialysis, registry, travelers)	HR Centralized Staffing
7	Personnel providing delivery/pick up, department visits , no direct patient proximity or contact, <u>brief</u> presence in nursing stations, pharmacy, clinics, OR/SPD i.e., Equip. service technician, rental equips. Delivery, nursing station delivery	
8	Vendors, Service/Agency Representatives i.e., reps in OR, infant photographers, equipment repair personnel required to be in a patient occupied room. <u>Prolonged</u> physical presence to a patient or providing technical verbal assistance to a provider during the course of a health care procedure or treatment.) Note: Pharmaceutical Service Representatives are obligated with additional requirements per Scripps Policy <i>Vendors, Pharmaceutical Representatives, Relations S-FW-EC-1156</i>	Scripps Sponsor (Manager & above), e.g., Supply Chain Mgmt., Biomed, Facilities Managers
9	Contractors Interior: Contractor, Construction/Engineering/Information Services Support Activities <u>inside</u> the facility, whose work is mostly in public or staff corridors. No direct patient contact but may be prolonged presence in the facility in direct contact with patient care staff. (i.e., work time spent mostly outside of containment or cube)	
10	Contractors Exterior or Behind Containment: Work is outside of the facility (i.e., grounds work, chiller repair) or behind containments and <u>occasionally</u> requires work in public or staff corridors. Access to and from the work area through common corridors and use of facilities in the building is acceptable.	

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Non-Employee Requirements	Category of Personnel									
	1	2	3	4	5	6	7	8	9	10
Background Screening Requirements Ref. <i>Background Screening S-FW-HR-0225</i> <i>* required only if under an affiliation with a college or university.</i>										
1. Background Screen: <ul style="list-style-type: none"> ▪ Social Security Number Validation ▪ Residence Trace County ▪ Criminal Background Activity 	NA	NA	YES*	YES	NA	YES	NA	YES	NA	NA
2. DHHS-OIG Exclusion List (Refer to Scripps Policy <i>Verification of Eligibility to Participate in Federally Funded Healthcare Programs; S-FW-HR-0918</i>)	NA	NA	YES*	YES	NA	YES	NA	YES	NA	NA
3. Substance (Drug) test	NA	NA	YES*	NA	NA	YES	NA	YES	NA	NA
4. California Department of Justice Internet Website for Registered Sex Offenders (Refer to Scripps Policy <i>Licensure/Certification Verification; S-FW-HR-0900</i>)	NA	NA	YES*	YES	YES	YES	NA	YES	NA	NA
5. Verification of education/certification	NA	NA	Yes, as applicable*	YES	NA	YES	NA	YES	NA	NA
6. Primary Source Verification of Licensure (Refer to Scripps Policy <i>Licensure/Certification Verification; S-FW-HR-0900</i>)	NA	NA	Yes, as applicable*	YES	NA	NA	NA	NA	NA	NA
7. Credentialing	NA	NA	Yes, as applicable*	YES	NA	NA	NA	NA	NA	NA
Health Screening										
1. Awareness not to enter facility w ILS (posters)	YES	YES	YES	YES	YES	YES	YES	YES	YES	Yes
2. Measles, Mumps and Rubella (MMR), Acceptable proof of immunity: <ul style="list-style-type: none"> ◆ 2 rubeola, 2 mumps, and 1 rubella vaccination records after the age of 1 or ◆ Serologic (titer) proof of immunity Note: <i>Physician observers - written attestation of immunity</i>	NA	NA	YES	YES	YES	YES	NA	YES	YES	NA
3. Varicella, acceptable proof of immunity: <ul style="list-style-type: none"> ◆ 2 Varicella vaccinations records after the age of 1 or ◆ Serologic (titer) proof of immunity Note: <i>Physician observers - written attestation of immunity</i>	NA	NA	YES	YES	YES	YES	NA	YES	YES	NA
4. Seasonal influenza vaccination/declination (same standard as for employee)	NA	NA	YES	YES	YES	YES	NA	YES	YES	NA
5. COVID vaccination/declination per government recommendations (same standard as for employee)	NA	NA	YES	YES	YES	YES	NA	YES	YES	NA
6. Tdap (Tetanus/Diphtheria/Pertussis) vaccination Note: <i>Physician observers - written attestation of immunity</i>	NA	NA	YES	YES	YES	YES	NA	YES	YES	NA
7. TB screening: <ul style="list-style-type: none"> ◆ <i>INITIAL: Completed TB Risk Assessment Questionnaire and Negative TB Test within the last 12 months or, if tested positive, evidence of additional screening or negative chest X-ray.</i> ◆ <i>ANNUAL: TB Risk Assessment</i> 	NA	NA	YES	YES	YES	YES	NA	YES	YES	NA
8. Hepatitis B immunization (must be offered by employer)	NA	NA	Yes, as applicable	YES	YES	YES	NA	YES	NA	NA
9. Specific IC training per category/area (health stream)	NA	NA	Yes, as applicable	YES	YES	YES	NA	YES	YES	NA

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	1	2	3	4	5	6	7	8	9	10
Contractual Validations										
1. Contract/MOU/Affiliation Agreement	NA	NA	Yes, as applicable	NA	NA	YES	NA	YES	YES	YES
2. Competency/ Credential Validation	NA	NA	NA	YES	NA	YES	NA	YES	NA	NA
3. Job Description, Scripps or other (if not contained in Contract/MOU)	NA	NA	NA	YES	YES	YES	NA	NA	NA	NA
Safety (System wide Safety Committee)										
1. Orientation Safety Basic (Fire exits, extinguishers, pull alarms and codes.)	NA	NA	YES	YES	YES	YES	NA	YES	YES	YES
2. Department Specific Orientation, e.g., Dust Buster	NA	NA	Yes, as applicable	YES	YES	YES	NA	YES	YES	Yes, as applicable
3. Workplace Violence Prevention Training	NA	NA	YES	YES	YES	YES	Yes, as applicable	YES	YES	NA
Identification Requirements ref. Badge Identification System S-FW-EC-2003										
1. Daily badge issue	NA	Yes	Yes (if < 15 days)	NA	NA	Yes (if < 15 days)	NA	YES	Yes (may be issued daily by site supervisor)	Yes
2. Scripps picture badge	NA	NA	Yes (if > 15 days)	green YES	orange YES	Yes (if > 15 days)	NA	NA	NA	NA
3. Company/agency picture badge with professional credential	NA	NA	YES	NA	NA	YES	NA	NA	NA	NA
4. Company/Agency identification (shirt or badge)	NA	Yes	NA	NA	NA	NA	YES	YES	YES	NA
Confidentiality (Privacy Officer/Patient Rights) refer to Confidentiality of Information S-FW-IM-0201										
1. The appropriate Confidentiality and Non-Disclosure Agreement based on role (e.g., Authorized Affiliate or Research NDA)	NA	NA	YES	YES	YES	YES	NA	YES	NA	NA
2. Patient is informed of the purpose of the presence and agrees to presence	NA	NA	YES	YES	YES	NA	NA	YES	Yes, as applicable	NA
3. Patient signed consent for presence of individual	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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Description: To establish minimal access
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