

Geisinger

OBSERVERSHIP/INTERNSHIP/EXTERNSHIP POLICY

PURPOSE

Learners may request time to observe our medical or related business and financial activities. This policy defines a procedure to assure the Learner understands and commits to maintaining confidentiality for all information to which they may have exposure including protected health information (PHI). This policy also ensures the correct procedure is in place to protect the health and well-being of our employees and the patients they serve.

PERSONS AFFECTED

All Employees
All Regions

POLICY

GHS may participate in or conduct training programs in which students, trainees, or practitioners in areas of health care learn under supervision to practice or improve their skills as health care providers or train non-health care professionals or for purposes of accreditation, certification, licensing, or credentialing activities.

Management must approve all Learners and assure confidentiality standards are followed. (See Standards).

These opportunities are limited and are extended to the community on a goodwill basis and in compliance with applicable law, rule and regulation. The arrangements for Learners must be conducted directly with the requested department. The assigned department proctor reserves the right to accept or reject candidates and is responsible for judging the appropriateness of candidates with regards to the scope and breadth of educational experience. The assigned proctor will also be required to review with the student GHS standards on confidentiality and patient rights.

Observers/Interns/Externs of clinical activities may watch and listen but may not provide patient care.

Observers/Interns/Externs in non-clinical departments may perform business activities under the direction of employees.

All Learners (except where an Affiliation Agreement exists with an educational institution to provide the learning experience) will be required to sign an Observational Experience Agreement prior to participating in the experience. If the Learner is less than 18 years of age, a parent or legal guardian will be required to sign the agreement along with the Learner.

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If a long-term relationship is sought with an educational institution for extended or re-occurring activities, an affiliation agreement must be executed through Academic Affairs

For practicums or co-op arrangements handled through specific affiliation agreements, individual patient consents and Observational Agreements are not needed.

Students, trainees, or practitioners who are not in a training program to practice or improve skills as health care providers or in a professional training program may not have access/exposure to PHI unless individual patients' authorizations are obtained. Management and the departmental proctors are responsible for compliance.

DEFINITIONS

Learner: Students, trainees, or practitioners in areas of health care learning under supervision to practice or improve their skills as health care providers, or non-health care professionals in training. Prospective employees and vendors are generally not Learners.

GHS: Refers to the system of health care comprised of the separate legal corporate parent, Geisinger Health System Foundation, and all of its separate legal corporate entities.

Practicum: A for-credit class taken by undergraduates where students receive the benefits gained through an internship experience with the combination of agreed upon meetings with a faculty member. In a practicum, students meet with faculty as a group, as opposed to an internship where a student can meet with a faculty member on an individual basis.

Co-op: Co-operative education is a process of education that formally integrates academic study with work experience. The standard co-op program consists of periods of academic study combined with periods of work experience in appropriate fields of business, industry, government, social services and the professions. Co-operative Education programs have the following requirements:

- Students are engaged in work rather than mere observation;
- Students are paid for work performed;
- The appropriate co-op program monitors students' progress on the job;
- Students produce a work term report or project based on their learning objectives and work experience; and
- Students performance on the job is supervised and evaluated by the employer.

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STANDARDS

The department where the internship is approved must keep the observational agreements for six (6) years. The department is responsible for all record keeping and obtaining the appropriate authorization forms from the privacy office.

Prospective employees may have access to the departments where they would work as part of the recruitment process and do not need formal agreements or patient authorization.

The HIPAA on-line training for Learners must be part of the orientation process. This training is done through goals.

Learners who are paid by GHS are considered employees and must complete the training appropriate for their duties as employees.

Others who do not meet the definition of Learner (eg. Elementary, Middle, High School Students, Vendors) may not have access to PHI unless individual patient authorizations are obtained.

Learners over the age of 18 are required to have a criminal background check. Learners must also obtain the Child Abuse Clearance and the Fingerprint - based Federal Criminal History Record as defined in HR Policy 04.196 Background Checking Policy. Learners must also have drug screenings and health screenings prior to their start date.

OBSERVERSHIP MATRIX

Group	Affiliation Agreement	HIPAA Training	Patient Authorization	Observational Agreement	Criminal Background Check	Childline Clearance	Act 73 Fingerprinting	Drug Screen/Health Screen
Learner as part of health care provider training or professional training program with a signed contract with Geisinger (ex. Medical Students, Nurse practicums, Co-op, etc.)	Yes	Yes	No	No	Yes	Yes	Yes	Yes

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Learner as part of health care professional training program with Geisinger for both educational credit and noncredit programs:								
<ul style="list-style-type: none"> less than 5 days (escorted by an employee at all times) 	No	Yes	Yes	Yes	No	Waiver if Escorted	Waiver if Escorted	Yes
<ul style="list-style-type: none"> 5 or more day 	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Others who do not meet the definition of learner and are short-term observers - less than 5 days (High Sch., Middle Sch., Elementary students, Vendors):								
<ul style="list-style-type: none"> No access to PHI and patients 	No	No	No	Yes	No	No	No	No
<ul style="list-style-type: none"> Access to PHI and patients (escorted) 	No	Yes	Yes	Yes	No	Waiver if Escorted	Waiver if Escorted	No

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by an employee at all times)								
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Throughout this policy the term "Geisinger" shall refer to the entire Health Care System comprised of Geisinger Health ("GH") as parent and all subsidiary corporate entities comprising the Health Care System.