
Subject	Job Shadowing
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Section	Medical Education
Subsection	General
Category	Corporate
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References

Health Insurance Portability and Accountability Act (HIPAA) of 1996

Applicable To

All Gundersen employees, medical and associate staff, participating schools, faculty/instructors and students/participants.

Detail

It is the policy of Gundersen to allow participants who are interested in pursuing careers in healthcare the opportunity to shadow employees and/or medical and associate staff members of Gundersen. These shadowing opportunities are provided in the context of fulfilling our other clinical, education, and research obligations. Due to issues of liability, confidentiality, compliance, service quality and patient safety, all Gundersen employees, medical and associate staff, participating schools, faculty/instructors and students/participants will be required to follow the guidelines of this policy.

An individual who wishes to job shadow an employee or medical/associate staff member of Gundersen at a Gundersen site must request permission in advance. Upon being granted permission, such individual will be required to complete a Job Shadow Request form, Job Shadow Health Screening form and sign a Job Shadow Agreement form and Confidentiality Statement. Each Department of Gundersen should establish their own internal guidelines, in addition to this policy, regarding how such requests should be handled.

Definition(s):

1. **Department** - a clinical or non-clinical department within Gundersen.
2. **Individually Identifiable Health Information** – information that is a subset of protected health information, including demographic information collected from an individual, and:
 - a. Is created or received by a health care provider, health plan, employer, or health care clearinghouse; and
 - b. Relates to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; and
 - i. that identifies the individual; or
 - ii. with respect to which there is a reasonable basis to believe the information can be used to identify the individual.

3. **Observer** - an individual who:
 - a. has completed the forms required by this policy;
 - b. has been approved by a Department; and
 - c. has been assigned to a Supervisor and/or mentor within a Department to job shadow an employee or medical staff of Gundersen.

“It is highly recommended that Observers be at least the age of 18 and a high school graduate prior to their job shadowing experience. Individuals under the age of 18 years old interested in a job shadowing experience shall participate in an GHS approved healthcare education program for observations or tours of Gundersen facilities where access to Protected Health Information (PHI) is kept to a minimum unless prior patient authorization has been obtained. The process for becoming an approved healthcare education program will be facilitated by contacting the Integrated Center for Education. ”

4. **Protected Health Information (PHI)** – all individually identifiable health information transmitted or maintained by a covered entity, regardless of form – i.e. paper, electronic or verbal.
5. **Site** - the location where the Observer will watch the employee or medical staff member at work. The healthcare facility or practice plan that occupies the Site will be responsible for the administration of the job shadowing experience in accordance with this policy. For purposes of this policy, the term site may include but not be limited to the Department, practices, clinics or hospitals affiliated with Gundersen.
6. **Supervisor/Mentor** - an individual who is employed by or affiliated with Gundersen, is affiliated with the Gundersen Department participating in the job shadowing experience and is responsible for determining when access to confidential information is appropriate.

Implementation

Request for Shadowing

1. The intended Observer should provide 10 days advance notice of their intent to shadow by completing a Job Shadow Request form. The purpose for this requirement is to allow the Sites to make the appropriate arrangements involving scheduling, confidentiality statements/packets, notification to Sites involved, etc.
2. Each Site must make an independent decision as to whether the arrangements proposed by the Department are appropriate. Gundersen does not have the authority to approve the release of PHI from non-Gundersen sites, but may facilitate these discussions. The Site may grant permission upon any specified terms and conditions it considers reasonable in order to:
 - a. Protect the privacy of its patients/clients and their health information; and
 - b. Ensure the safety of the Observer and the patients/clients at the Site.

Confidentiality Statement

Human Resources will send to the Observer the Confidentiality Policy and Confidentiality Statement. The Observer shall review the Confidentiality Policy and return the signed Confidentiality Statement to the

Human Resource Service Center prior to the scheduled date of the shadowing experience. This statement must be on file the day the shadowing is to take place and be kept on file by the Department for future reference.

Preparation for the Shadowing Experience

1. Prior to giving permission to an Observer to participate, the Department and/or Site shall:
 - a. Agree upon the scope, date, time and duration of the experience;
 - b. Make appropriate risk assessments about potential dangers to the Observer or patients/clients that may exist at the Site and in the specific locations where the Observer will be present, such as exposure to infections, injury or trauma;
 - c. Ensure that all potential risks are eliminated or minimized;
 - d. Prior to any type of hospital/clinical experience, the students/observers will be issued an appropriate Gundersen name badge by the Human Resource Service Center, which they will be expected to wear at all times and which must be surrendered to the Human Resource Service Center upon completion of the Job Shadowing experience.
2. The Site shall retain the right to refuse permission to an Observer who has requested a job shadowing experience at the Site.

Patient Authorization

1. If possible, patients shall be told at the time they check-in that job shadowing is taking place that day.
2. The patient must be asked if they consent to having the Observer present during any exam.
3. Under no circumstances is the patient to be asked to give this consent in the presence of the Observer. If the patient does provide consent, it is highly recommended that the consent be in writing by allowing them to sign a form acknowledging such. If verbal consent is obtained, the Supervisor and/or mentor or individual must document that the patient agreed to the Observer's presence during the exam. For example, the note could state "*The patient consented to having the Observer present during the exam.*" The patient must be informed of their right to, at any time, change their mind and request that the Observer excuse themselves from the room.
4. In situations where the patient may be unable to provide consent before receiving treatment, shadowing may not occur (i.e. in the emergency room, in an ambulance, etc.)
5. Prior consent of the patient is not necessary if the Observer is a medical student or resident who is present during or participating in the treatment of the patient as part of his/her medical education.

Observer's Responsibilities

1. The Observer must have read and signed the Job Shadow Agreement.
2. The Observer must have read and signed the Gundersen Confidentiality Statement.

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3. Use and disclosure of PHI is the responsibility of the employee or medical/associate staff member being job shadowed.
 4. Use and disclosure must be in accordance with government and accreditation regulations and the policies of Gundersen, the Department/Practice Plan and the Site of the shadowing experience.
 5. The Observer is not permitted to discuss confidential patient information with anyone other than the person(s) they are job shadowing or his/her designee. The Observer is not permitted to use or disclose PHI.
 6. The Observer must complete the Job Shadow Health Screening form in time for review and approval before the first day of observation.

Supervisor's/Mentor's Responsibilities

1. The employee or medical/associate staff member arranging the job shadowing experience shall agree to:
 - a. Remind the Observer of the obligation under the Gundersen Confidentiality Statement;
 - b. Minimize the amount of PHI provided to the Observer or that the Observer is exposed to.
2. A short orientation session is recommended prior to the shadowing experience to go over the schedule of the day, expectations, and to allow the Observer to ask any questions regarding his/her responsibilities to maintain confidentiality of any PHI he/she may encounter. The Confidentiality Statement may be signed by the staff providing the session. A copy shall be retained as designated at the Site.
3. No employee or medical/associate staff member may sponsor an Observer unless the employee or medical/associate staff member has completed HIPAA training and their Department/Division has HIPAA policies in place. Prior to commencing with the shadowing, the Observer shall be asked if they have any questions regarding the Confidentiality Agreement they have signed.
4. Each Supervisor and/or mentor will be personally responsible for their Observer during the time the Observer is on Site. The Supervisor and/or mentor shall sign a form acknowledging such responsibility. An alternate person to supervise the Observer if the Supervisor and/or mentor is called away shall be declared in advance.

General Safeguards

1. During the shadowing process, the Observer may not partake in any direct clinical action.
2. The Observer may not perform any task that would normally be performed by a healthcare worker.

3. Observer will be prohibited from observing in the following areas: operating room, mental health, sexual assault, communicable diseases and areas of non-clinical and clinical where children under the age of 18 are seen (unless parent permission obtained).
4. Observer must wear appropriate clothing as defined by the Site for the Job Shadowing experience.
5. At no time shall the Observer represent himself or herself as a member of the health care workforce at that Site.
6. The Observer is required to wear a name tag/badge at all times indicating that he/she is an Observer.
7. The Observer may only be involved in the observation of patients of the Supervisor and/or mentor. If the Observer is to shadow a Supervisor and/or mentor within a hospital setting or shared clinical space where other health care providers who are not part of the same Department are also seeing patients, it is the responsibility of the Supervisor and/or mentor to get prior authorization from those Sites. The Observer shall be limited to the physical offices of the Supervisor and/or mentor unless prior authorizations from the Sites have been obtained.
8. Under no condition is the Observer to be provided with copies of any materials containing PHI. The minimum necessary rule applies.