



Origination 5/25/2021

Last 7/5/2023

Approved

Effective 7/5/2023

Last Revised 7/5/2023

Next Review 7/4/2024

Owner Jennifer Lee:  
Director

Area Corporate -  
Medical  
Education

Applicability Gundersen

References Policy

## Job Shadow, GL-9932

### References

Health Insurance Portability and Accountability Act (HIPAA) of 1996

### Applicable To

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

### Purpose Statement

It is the policy of Gundersen, while protecting patient privacy and ensuring patient safety, 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. Shadowing opportunities are provided in the context of fulfilling our other clinical, educational, 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, 16 and older, who wishes to job shadow an employee or medical/associate staff member of Gundersen at a Gundersen or Affiliate site must request permission in advance. Individuals will be required to complete a Job Shadow Request Application, Job Shadow Health Screening Form, sign a Job Shadow Agreement Form, and Confidentiality Statement, to be considered to complete a job shadow experience. Each Department of Gundersen or Affiliate should establish their own internal guidelines, in addition to this policy, regarding how such requests should be handled.

# Definitions

**Department** - a clinical or non-clinical department within Gundersen or Affiliate where shadower will observe an employee or medical/associate staff member work. the healthcare facility or practice plan that occupies the Department will be responsible for the administration of the job shadowing experience in accordance with this policy.

**Individually Identifiable Health Information** - information that is a subset of protected health information, including demographic information collected from an individual, and:

- Is created or received by a health care provider, health plan, employer, or health care clearinghouse; and
- 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
  - that identifies the individual; or
  - with respect to which there is a reasonable basis to believe the information can be used to identify the individual.

**Shadower** - an individual who accompanies someone in their daily activities at work to gain experience or insight into a job. To participate, an individual must: Complete the forms required by this policy; been approved by a Department; and been assigned to a preceptor/mentor to an employee or medical/associate staff of Gundersen or Affiliate during the shadowers' identified experience.

**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.

**Preceptor/Mentor** - an individual who is employed by Gundersen or an Affiliate with the Department participating in the job shadowing experience and is responsible for determining when access to confidential information is appropriate. The Preceptor/Mentor cannot be a family member, shadower's spouse, domestic partner, sibling, parent(s), or children.

## Implementation

### Request for Shadowing

1. The intended shadower should provide a minimum of, thirty (30) days advance notice of their intent to shadow by completing, and submitting all of the appropriate Job Shadow paperwork. The purpose for this requirement is to allow Gundersen or Affiliate job shadow personnel to make the appropriate arrangements involving scheduling, confidentiality statements/packets, and/or notification to Department(s) involved.
2. Each Department must make an independent decision as to whether the arrangements proposed are appropriate. Gundersen or Affiliate does not have the authority to approve the release of PHI from non-Gundersen sites but may facilitate these discussions. The Department 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 shadower and the patients/clients in the Department.

## Confidentiality Statement

The Shadower will review the Confidentiality and Security of Information Policy as well as review, complete, and sign the Confidentiality Statement available online. Upon signing the Confidentiality Statement, the Shadower will email a copy to [GHSJobShadows@gundersenhealth.org](mailto:GHSJobShadows@gundersenhealth.org), 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 Medical Education or ICE House staff for future reference.

## Preparation for the Shadowing Experience

1. Prior to giving permission to participate as a shadow, the Department shall:
  - a. Agree upon the scope, date, time and duration of the experience;
  - b. Make appropriate risk assessments about potential dangers to the shadower and/or patients/clients that may exist in the Department and in the specific locations where the shadower 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 shadower will be issued an appropriate Gundersen badge by Gundersen job shadow personnel, which they will be expected to wear at all times and must be surrendered to Gundersen job shadow personnel upon completion of the Job Shadowing experience.
2. The Department shall retain the right to refuse permission to an shadower who has requested a job shadowing experience.

## Patient Authorization

1. The patient must be asked if they consent to having the shadower present during any exam. If verbal consent cannot be obtained prior to patient receiving treatment (i.e., emergency room, in an ambulance, etc.) shadowing may not occur.
2. Under no circumstances is the patient to be asked to give this consent in the presence of the shadower. If the patient does provide consent, the preceptor/mentor must document that the patient agreed to the shadower's presence during the exam. For example, the note could state *"The patient consented to having the shadower present during the exam."* The patient must be informed of their right to, at any time, change their mind and request that the shadower excuse themselves from the room.
3. Prior consent of the patient is not necessary, if the Shadower is a medical, PA, or APRN student or resident/fellow who is present during or participating in the treatment of the patient as part of their medical education training.

# Responsibilities

## Shadower's Responsibilities

1. The shadower must:
  1. Have read the Job Shadow Policy and Job Shadow Agreement as well as signed the Job Shadow Agreement.
  2. Have read the Confidentiality and Security of Information Policy, the Confidentiality Statement, as well as signed the Confidentiality Statement.
  3. Have completed the Job Shadow Health Screening form prior to thirty (30) days of the requested experience.
2. Use and disclosure of any care, treatment, or PHI must be in accordance with government and accreditation regulations and the policies of Gundersen, the Department/Practice Plan.
3. The shadower is Not:
  1. Permitted to discuss confidential patient information with anyone other than the person(s) they are job shadowing or their designee. The shadower is not permitted to use or disclose PHI.
  2. Allowed to use any of the equipment while completing observation hours, unless specifically directed by the supervising health care professional. This includes treatment tables.
  3. To use cell phones, cameras, or other recording devices of any kind in all areas of Gundersen or Affiliate where patient care is provided.
  4. Able to provide or engage in patient care. This includes pushing a patient in a wheelchair, etc.
4. Shadowers are to present in a neat and professional appearance at all times, and be within Gundersen Dress Code Policy, as their appearance reflects directly upon Gundersen.

## Preceptor's/Mentor's Responsibilities

1. The employee or medical/associate staff member arranging the job shadowing experience shall agree to:
  - a. Remind the shadower of the obligation under the Gundersen Confidentiality Statement;
  - b. Minimize the amount of PHI provided to the shadower or that the shadower 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 shadower to ask any questions regarding their responsibilities to maintain confidentiality of any PHI they may encounter.
3. No employee or medical/associate staff member may sponsor an shadower 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 shadower shall be asked if they have any questions regarding the Confidentiality Agreement they have signed.

4. Each preceptor/mentor will be personally responsible for their shadower during the time the shadower is in the Department. An alternate person to supervise the shadower if the preceptor/mentor is called away shall be declared in advance.

## General Safeguards

1. During the shadowing experience, the shadower may not partake in any patient care.
2. The shadower may not perform any task that would normally be performed by a healthcare worker.
3. Shadower's will be prohibited from shadowing in the areas determined by the Department or job shadower personnel.
4. Shadower's must, at a minimum, wear appropriate clothing as defined by the GHS Dress Code Policy.
5. At no time shall the shadower represent themselves as a member of the health care workforce in the Department.
6. The shadower is required to wear a badge at all times indicating that they are a shadower.
7. The shadower may only be involved in the observation of patients of the preceptor/mentor. If the shadower is to shadow a preceptor/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 preceptor/mentor to get prior authorization from those Departments. The shadower shall be limited to the physical offices of the preceptor/mentor unless prior authorizations from the Department have been obtained.
8. Under no condition is the shadower to be provided with any paper or electronic files/materials containing PHI. The minimum necessary rule applies.
9. The Job Shadow Program allows a Shadower to shadow in a department for a total of up to 8 hours. Individuals needing shadowing hours for a class or application to a program can shadow in a unit or department for a total up to 60 hours. This will be determined by the department, if they can accommodate.
  1. Current Gundersen employees are encouraged to reach out to the Career Development Center to discuss future goal paths. Career Development Center will reach out on a Shadowers behalf to request any Job Shadow experience.
10. If the shadower is a minor, the shadower needs to provide a parent/guardian signature of approval to [GHSjobShadows@gundersenhealth.org](mailto:GHSjobShadows@gundersenhealth.org) prior to participating.

## Approval Signatures

Step Description

Approver

Date

MD	Stephen Shapiro: MD	7/5/2023
MD	Benjamin Jarman: MD	7/5/2023
Director	Jennifer Lee: Director	5/26/2023
Policy Review Committee	Caitlyn Russell: HR Program Consultant	5/26/2023
	Jennifer Lee: Director	5/25/2023

COPY