Appendix A: OHSU Healthcare member Compliance Matrix

OHSU Healthcare identifies and regulates the compliance requirements for all OHSU Workforce Members who reside in the Healthcare mission or provide clinical support in the healthcare environment.

OHSU Member: applies to all employees (faculty, represented, unclassified administrative and other categories), registered and visiting students, volunteers, members of the OHSU Board and the Doernbecher Children’s Hospital Foundation Board of Directors, visiting healthcare practitioners, contracted nonpermanent individuals, vendors while doing business with OHSU, and others who work for or on behalf of OHSU, OHSU Foundation and Doernbecher Children’s Hospital Foundation.

Definitions:

As defined in OHSU Visiting Scientists and Other Affiliates Policy: [http://www.ohsu.edu/xd/about/services/integrity/policies/upload/OHSU_Visiting_Scientists_Other-Affiliates5.pdf](http://www.ohsu.edu/xd/about/services/integrity/policies/upload/OHSU_Visiting_Scientists_Other-Affiliates5.pdf)

| 1. Unescorted visitor (any one criteria is sufficient to define Unescorted Visitor) | a. Doing work for OHSU (compensated or volunteer and other than as defined in Escorted Visitor) 
| b. Accessing protected health information (PHI - not incidentally or accidentally) 
| c. Accessing confidential/proprietary information 
| d. Receipt of an OHSU ID badge 
| e. Here daily for greater than 30 days 
| f. Presence in/access to high-risk/security areas/information 
| g. Access to the OHSU computer network 
| h. Any performance of human subjects research activities 
| i. Any performance of animal subjects research activities 
| j. Any direct intervention with or treatment of patients [Privileges are required for any direct intervention with or treatment of patients,] 
| k. Additional characteristics, as determined by the Director of Public Safety, the 
| l. Director of Human Resources, and/or the Information Security Officer |
| 2. Escorted visitor | a. None of the Unescorted Visitor characteristics are present or specific pre-approval of a waiver by the Director of Public Safety 
| b. Activities limited to observation (this could include observation of patient/human subject interactions) 
| c. Media presence for University News and Publications-approved purpose 
| d. Vendors who do not meet any Unescorted Access characteristics. (Note: those who are here for brief delivery, service, maintenance, or similar routine functions are addressed under the Casual Visitor category) 
| e. Coming to OHSU to provide a lecture or series of lectures for a class and not accessing patient/subject or other confidential information 
| f. Interactions with patients or subjects that are incidental, casual, or social in nature 
| g. Presence only in low risk areas that do not contain confidential information 
| h. Here for a special event such as “Bring Your Child to Work Day” or a similar event and will not be engaged in any activities characteristic of an Unescorted Visitor |
| 3. Casual visitor | a. Patient 
| b. Approved visitors to patients or other providing assistance to a patient 
| c. Job applicant/interviewee 
| d. School applicant/interviewee 
| e. Delivery people (mail, materials, patients, etc.) 
| f. Sales representatives who are here for brief visits (see also, Health Care System Admin Manual, Adm. 01.12: [http://ozone.ohsu.edu/HealthSystems/Adm01PtCare/Adm01-12.html](http://ozone.ohsu.edu/HealthSystems/Adm01PtCare/Adm01-12.html)) 
| g. Attendees at OHSU sponsored/sanctioned events open to the public or specific groups (public lectures, meetings, seminars, events, etc.) 
| h. Social visits to OHSU employees/students that are limited and appropriate to the area being visited (Note: Only persons with Unescorted Access may invite guests) |

Definitions for Workforce Members:

| 4. OHSU Employee (working in the Healthcare Environment) | a. An individual who receives payment from OHSU via the OHSU Payroll process for work performed 
| b. Employees may have direct patient contact as defined by their job and/or position 
| c. By definition they are unescorted |
| 5. Observer | a. An individual who is actively involved in a professional health care track. This includes a high school student interested in pursuing a career in healthcare, pre-med student, job shadows and foreign medical professionals. |

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b. By definition an Observer must not provide patient care.
  c. Considered an escorted visitor who will be at OHSU for duration of less than two (2) weeks.

6. Vendor / Consultant / Contractors
   a. An individual who is coming to OHSU:
      i. On a sales call—either as an approved or non-approved vendor
      ii. A consultant providing professional services to OHSU.
   b. Considered casual visitors if they come to OHSU on a sporadic or irregular basis; contractors on longer assignments without supervision are considered unescorted visitors

7. Student / Trainee / Intern (non-OHSU) including Licensed Community Nurses
   a. An individual not in an OHSU school or program who is coming to OHSU as a student or trainee (someone working at another organization) to receive clinical training from OHSU personnel in specific skills or specialties
   b. Considered unescorted if they will be at OHSU for greater than two (2) weeks — i.e. internship program
   c. May have direct patient contact

8. OHSU Students
   a. An individual in an OHSU school or program receiving clinical training in the Healthcare mission
   b. Does not include House Officers, Fellows or Post Docs as they are considered OHSU employees
   c. Considered unescorted

9. Volunteer
   a. An individual who is providing services without pay.
   b. In some roles there will be similarity to the corresponding Healthcare job.
   c. Considered unescorted
   d. Length of service is minimum of 6 months

10. Contract Labor (includes temporary labor through an agency)
    a. An individual who is working in an OHSU specific position, but is not considered an OHSU employee as they are paid through the contracting agency
    b. Considered unescorted with a length of stay dependent upon the assignment being filled

11. Non Employee LIP Privileged at OHSU
    a. A non-employee who is privileged at OHSU
    b. Must hold an appointment in a department with an OHSU School
    c. Considered an unescorted visitor

12. Non Employee Clinical Support Personnel
    a. A non-OHSU person who will complete the functions of an employee under the supervision of a non-employee privileged person
    b. Considered an escorted visitor with a length of stay dependent on the service being provided
    c. This would include professionals who are receiving training for continuing education credit through an OHSU privileged person
    d. As a matter of practice, privileged personnel who are non-employees shall utilize OHSU employee personnel whenever possible. If uniquely qualified individuals are needed and there is no OHSU employee who meets the qualifications, then a non-OHSU employee may be used provided they have completed the corresponding compliance requirements as defined in the table below.

Requirements:

- All Workforce Members are required to respect OHSU and patient property.
- The manager, department administrator, director or hospital administrator of the hosting department must approve the Workforce Member’s presence.
- The hosting department must be aware of the areas of OHSU being accessed and agree that this access meets the requirements outlined in the escorted definition above, if applicable.
- Other requirements for Workforce Members are role-specific and described in the table below.

<table>
<thead>
<tr>
<th>Definitions and Additional Requirements by Role:</th>
<th>OHSU Healthcare Employee</th>
<th>Observer</th>
<th>Vendor / Consultant / Contractor</th>
<th>Student / Trainee / Intern (non-OHSU) including Licensed Community Nurses</th>
<th>OHSU Students</th>
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<tbody>
<tr>
<td><strong>Age Restrictions</strong></td>
<td>• Must be 16 years of age to be an employee at OHSU</td>
<td>• No admittance under the age of 16[?].</td>
<td>• If under the age of 18 parental consent required (see below).</td>
<td>• Not applicable</td>
<td>• Not applicable</td>
<td>• Must be 14 years of age and in high school</td>
<td>• Not applicable</td>
<td>• Not applicable</td>
<td>• Not applicable</td>
</tr>
<tr>
<td><strong>Infection Control</strong></td>
<td>• Follow all OHSU policy and department procedures (when applicable) related to Infection Control.</td>
<td>• Clean hands appropriately upon entering and leaving a patient care unit and after coughing or sneezing.</td>
<td>• Follow isolation signs that may be posted on room doors.</td>
<td>• Follow the Ill Provider Policy (i.e. not come to work when ill): <a href="http://ozone.ohsu.edu/healthsystem/policy/display.cfm?id=682">http://ozone.ohsu.edu/healthsystem/policy/display.cfm?id=682</a></td>
<td>• Follow all department procedures related to Infection Control.</td>
<td>• Follow all OHSU policy and department procedures (when applicable) related to Infection Control.</td>
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</tr>
<tr>
<td><strong>Background Check (BC)</strong></td>
<td>• Yes – through TCAP</td>
<td>• Not required</td>
<td>• Not required for casual visitors Required for unescorted visitors through Public Safety via hosting department <a href="http://ozone.ohsu.edu/hr/docs/background_disclosure.pdf">http://ozone.ohsu.edu/hr/docs/background_disclosure.pdf</a></td>
<td>• Required for unescorted student/trainee and is completed through TCAP via hosting department</td>
<td>• Required; Completed through Public Safety</td>
<td>• Required; Completed through TCAP for Healthcare Volunteers</td>
<td>• Required; refer to contract to determine if the BC is completed through the vendor; if not, completed through TCAP via hosting department</td>
<td>• Required; completed through Public Safety via hosting department</td>
<td>• Required; completed through Public Safety via hosting department</td>
</tr>
<tr>
<td><strong>Drug Test (DT)</strong></td>
<td>• Defined at the job and/or position</td>
<td>• Not required</td>
<td>• Required if the individual will have direct patient contact Refer to contract</td>
<td>• Required if the student will have direct patient contact Refer to contract</td>
<td>• Required for those students who will complete a clinical practicum as part of their education</td>
<td>• Required for those volunteers who will have direct patient contact Completed</td>
<td>• Required; refer to contract to determine if the DT is completed through the</td>
<td>• Not required</td>
<td>• Required Hosting department should follow the same drug testing</td>
</tr>
</tbody>
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<tr>
<td>OIG/GSA – Excluded / Debarred</td>
<td>• Required</td>
<td>• Not required</td>
<td>• Required</td>
<td>• Not required</td>
<td>• Not required</td>
<td>• Not required</td>
<td>• Required</td>
<td>• Required</td>
<td>• Required</td>
</tr>
<tr>
<td>Licenses and Certifications</td>
<td>• Defined at the job/position</td>
<td>• Requires primary source verification</td>
<td>• Not required</td>
<td>• Licensed to do business in Oregon</td>
<td>• As required by the specific assignment or job – primary source verification done by vendor or employer</td>
<td>• Not applicable, unless educational program requires license(s) / certification(s)</td>
<td>• Not applicable, unless educational program requires license(s) / certification(s)</td>
<td>• Not applicable</td>
<td>• Required as part of the privileging process</td>
</tr>
<tr>
<td>Resuscitation Certifications (ex: BLS, ACLS, PALS)</td>
<td>• Defined at the job/position</td>
<td>• Verified by department</td>
<td>• Not required</td>
<td>• For contractors as required by the specific assignment or job</td>
<td>• For vendor /</td>
<td>• Not required unless educational program requires this</td>
<td>• Not required unless educational program requires this</td>
<td>• Not required</td>
<td>• Required based on the job/position they are filling</td>
</tr>
</tbody>
</table>

*Note: The table above outlines the definitions and additional requirements by role, including details for OHSU Healthcare Employee, Observer, Vendor / Consultant / Contractor, Student / Trainee / Intern (non-OHSU) including Licensed Community Nurses, OHSU Students, Healthcare Volunteer, Contract Labor (includes temporary labor through an agency), Non Employee LIP Privileged at OHSU, and Non Employee Clinical Support Personnel. Each role has specific requirements, and the table indicates whether a requirement is defined at the job/position, required, not required, or requires primary source verification.*
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<td></td>
</tr>
<tr>
<td>Training / Orientation / Competencies</td>
</tr>
<tr>
<td>Credentialing</td>
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<tr>
<td>Contract Requirements</td>
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<tr>
<td>Level of Supervision</td>
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<td>Employee</td>
<td>on the requirements of the program / department; otherwise escorted at all times by an OHSU employee</td>
<td>program / department</td>
<td>does not include House Officers, Fellows, or Post Doctoral status as they are considered employees</td>
<td>responsible for supervision in addition to the volunteer coordinator or supervisor</td>
<td>supervisor</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Required</td>
<td>Not required for the casual visitor</td>
<td>Required for an unescorted visitor</td>
<td>Not required for a casual visitor</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Covered under OHSU existing lines of coverage</td>
<td>Insurance requirements as identified in the contract</td>
<td>Insurance requirements as identified in the contract (if one exists with home institution)</td>
<td>Professional Liability coverage</td>
<td>Workers' Compensation coverage in some cases if contract not in place (contact Risk Management for further information)</td>
<td>Covered under OHSU existing lines of coverage</td>
<td>Must be registered with Volunteer Services in order to have Workers' Compensation coverage</td>
<td>Insurance requirements as identified in the contract</td>
<td>Professional Liability coverage</td>
<td>Workers' Compensation coverage</td>
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<td>Covered under OHSU existing lines of coverage</td>
<td>Must request Off Campus Authorization (OCA) from Risk Management if training/working at another institution or non-OHSU location</td>
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<td>Workers' Compensation coverage</td>
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</tr>
<tr>
<td>Documentation Requirements for Workforce Members (including: storage, access and retention)</td>
<td>As defined by the Employee Personnel File Policy and Procedure (insert link)</td>
<td>Not Required</td>
<td>Not Required</td>
<td>Not applicable</td>
<td>Not applicable</td>
<td>Not applicable</td>
<td>Not applicable</td>
<td>Not applicable</td>
<td>Not applicable</td>
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<tr>
<td>As defined by the Employee Personnel File Policy and Procedure (insert link)</td>
<td>Follow the Employee Personnel File Policy and Procedure</td>
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<td>Follow the Volunteer Services File Policy</td>
<td>Follow the Employee Personnel File Policy and Procedure</td>
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<tr>
<td>Human Resources Requirements</td>
<td>All employees must in the HR Oracle database</td>
<td>Follow guidelines in OHSU Visiting Scientists and Other</td>
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<tr>
<td>• Entered via an HR New Hire Action (completed through HR Express)</td>
<td></td>
<td>Affiliates Policy (under Related Policies)</td>
<td>Other Affiliates Policy (under Related Policies)</td>
<td>Other Affiliates Policy (under Related Policies)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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Notes:

1. **Computer Access:**
   Refer to the Information Technology Group's User Account Website for information on access availability requirements.

2. **Compliance:**
   Privacy: A Priority at OHSU – Guidelines for Visitors. To request Privacy Cards for distribution in your area, please send a request to oips@ohsu.edu. The subject line should read “Privacy Card Request”. Please be sure to specify the number required, the correct mail code and a contact name.

3. **Parking:**
   Anyone parking at OHSU shall adhere to OHSU policies related to parking. The hosting department may purchase a parking pass for their observer. An observer is not permitted to park in patient or employee areas. For additional options on transportation to OHSU and for maps of the OHSU campus see our travel directions web page.

Related Policies:

1. This policy is linked to the OHSU Visiting Scientists and Other Affiliates Policy: [http://www.ohsu.edu/xd/about/services/integrity/policies/upload/OHSU_Visiting_Scientists_Other-Affiliates5.pdf](http://www.ohsu.edu/xd/about/services/integrity/policies/upload/OHSU_Visiting_Scientists_Other-Affiliates5.pdf)
2. Licensure, Certification and Registration Requirements of OHSU Healthcare Workforce Members: [http://ozone.ohsu.edu/healthsystem/nursing/policy/display.cfm?id=912](http://ozone.ohsu.edu/healthsystem/nursing/policy/display.cfm?id=912)

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**Exhibit A**

OIG (Office of the Inspector General) / GSA (General Services Administration) Verification

To complete the OIG/GSA verification:

1. **OIG:**
   a. Go to: [http://exclusions.oig.hhs.gov/search.aspx](http://exclusions.oig.hhs.gov/search.aspx)
   b. Enter the workforce member’s information: Last Name, First Name
   c. You will get a confirmation indicating whether or not results were found
   d. If no results were found then the workforce member has passed the verification
   e. If results were found then the workforce member has failed the verification and is not able to be a member of the OHSU workforce

2. **GSA – Excluded Parties List System:**

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doips@ohsu.edu
b. Enter the workforce member's information: Last Name, First Name Middle Name or Middle Initial and their SSN or TIN

c. You will get a confirmation indicating whether or not results were found

d. If no results were found then the workforce member has passed the verification

e. If results were found then the workforce member has failed the verification and is not able to be a member of the OHSU workforce